Attachment 9 to Memorandum #7: Statement of Rodger Griffiths

Date	21 January 2026
To	Jon Bright, Project Director – Waitaha Hydro Scheme Westpower Ltd
From	Rodger Griffiths
Project advice provided for	*Waitaha Hydro Scheme*
Document referred to	*Waitaha Hydro Scheme Substantive Application Appendix 3 Project Overview Report Part 1 and Part 2*
Signature	[redacted]

1. I have reviewed all comments submitted and addressed further matters that may assist the Panel in this response.

2. To provide further detail, context or clarity on my report Appendix 3: Project Overview Report Part 1,[1] this response addresses:

   (a) temporary construction effects - access;

   (b) operational effects:

      (i) headworks; and

      (ii) transmission line;

   (c) landowner comments;

   (d) New Zealand Conservation Authority comments;

   (e) continuing discussions about access; and

   (f) electricity resilience benefits and market updates.

Temporary construction effects - access

3. I acknowledge the Minister for the South Island and Hunting and Fishing's view, while recognising the significant regional benefits of the Scheme, that there may be some need to restrict access to areas traditionally used for hunting and fishing for

[1] Appendix 3 project overview report part1; and Appendix 3 project overview report part2: Part 2 includes attachments to Part 1.

construction and operation of the Scheme, and reasonable public access should be maintained.

4. That is also Westpower's position. Construction and the sequencing timetable is addressed in section 7 of my report. There is no intention to restrict access more than what is absolutely required to meet health and safety requirements (and no intention for the track being closed during the whole construction period). Any track closures will be of a short duration solely while necessary works are completed as addressed below.

5. Engagement with West Coast Fish and Game (**WC Fish and Game**) occurred in April 2025 (the emails are separately attached as **Appendix 1**) and in May we had discussions with NZ Game Animal Council. Our understanding of the position of the Game Animal Council is that they were not concerned with the impacts of the scheme *per se,* but were interested in opportunities to gain better access to the upper Waitaha Valley, which is currently restricted by third party property rights issues beyond Westpower's control.

6. WC Fish and Game confirmed that they:

   (a) had been aware of the project since the initial concession process;

   (b) considered there are only minor effects on the matters of interest to it; and

   (c) did not consider that, provided the scheme proceeds as currently proposed, they required further consultation.

7. The proposed resource consent conditions require a Health and Safety plan (Part D, Condition 60b)) to address all aspects of the Concession activity. The Construction Environmental Management Plan (Part B, Condition 17a)viii)) must address health and safety, including methods for providing for the health and safety of the general public, during construction and must include copies of other management plans applicable to project construction. Minimising adverse effects of helicopter users on recreational users of the Waitaha Valley and high ecological areas supporting wildlife, and health and safety, is also addressed in the Flight Management Plan (construction) (Part D, Condition 20) and in the Site Operations and Monitoring Plan (after construction) (Part B, Condition 23d)). Adequate flexibility is required to ensure the contractor can manage health and safety prudently and construct the Scheme.

8. Mitigations have already been considered and incorporated which reduce the impact on the environment and track closures such as providing the alternative track around the Power Station. Part D, Condition 60 has been amended to include that the project

website will include information about the construction programme and progress and the potential for track closures. There is also a DOC website relating to the Kiwi Flat Hut which could be linked to Westpower's updates in the "Know before you go" section.[2]

9. In terms of the construction sequences, the period where health and safety will most likely require the highest number of temporary and short-term track closures is during stages of the project including:

   (a) access road construction; and

   (b) rock blasting at the upper and lower tunnel portals.

10. Westpower will prioritise management options that avoid closure of the track ahead of options that require its closure as far as practicable and subject to operational, engineering and health and safety (the last as the fundamental priority). Apart from crossing the access road and construction works for Alpha Creek crossing, the track (following its planned realignment) does not traverse the construction area. However, the construction area will be visible where the swing bridge crosses well above the weir construction site at the upper end of Morgan Gorge.

11. The decision to close the track will be a last resort for genuine health and safety reasons. Westpower will:

   (a) commit to:

      (i) closures no longer than 2 hours in one day for blasting; and

      (ii) only occasional brief delays of up to 30 mins during road (or river training wall) construction if this work happens to be in close proximity to the track in order to arrange a safety escort;

   (b) where surrounding construction work is occurring, and the track remains open (i.e. the majority of the construction period), provide a reasonable method for recreationalists to request an escort safely guide them through any construction works (Part D, Condition 60).

[2] Kiwi Flat Hut: Waitaha River area, West Coast region.

Operational effects

Headworks

12. Mr Head in his peer review for the Department of Conservation (**DOC**), includes the picture of a 20-tonne digger for ongoing maintenance. A 20-tonne digger is preferred over a 12-tonne digger as its longer reach will enable it greater opportunity to sit out of the riverbed while undertaking the works.

13. Westpower will mitigate the visual effects of the digger by painting it a dark recessive colour, (e.g. karaka green or similar – this is addressed further by Mr Bentley) should that be preferable, noting its time in the river (some 5-15 times a year depending on the weather) will be for approximately 4 hours at a time. Otherwise it will be stored out of view and flooding risk at the apex of the access tunnel, which is at least 100 m inside the tunnel (Part D, Condition 43).

Transmission line

14. In my report, the Summary of Project Description at page 1 and 2, includes:

> *The operational footprint is less than 12 ha, which encompasses project areas between the Waitaha substation and the Headworks…*
>
> *From the farm boundary at Anderson Road there is approximately 12.6 km of existing transmission line which continues via the Waitaha Road to SH6, along SH6, and then follows Beach Road and Bold Head Road to the connection with Westpower network. It is noted that the line will be upgraded at the beginning of Waitaha Road, along SH6 and along Beach Road and Bold Head Road, and a new 66 kV line will be built along the Waitaha Road (except the beginning) all the way to the Power Station.*

15. The operational footprint of the new transmission line along Waitaha Road and to the existing network connection described in the Project Description is incorrect because it does not include the approximately 10.7 ha that should be attributed to the transmission line along Waitaha Road. Specifically, that area covers the distance between McLean farm and the slight bend in Waitaha Road near State Highway 6 (about 270 m from the beginning of Waitaha Road). This area is based upon a total line corridor width of 10 m, including an allowance for conductor swing due to wind, and was left out of the initial calculations. It was a permitted activity at the time the table was originally prepared.

16. This corridor will sit within and overlay the minimum 20 m width road reserve down Waitaha Road, aided by the relatively narrow seal widths included in the table below.

Any conductor swinging over the sealed carriageway will always remain well above the minimum regulatory limit of 6.5 m according to NZECP 34:2001 Table 4 and will not interfere with the normal use of the road.

17. Westpower is highly experienced in constructing new lines and its detailed design for transmission lines will comply with the following standards:

    (a) Electricity (Safety) Regulations 2010;

    (b) AS /NZS 7000:2016; and

    (c) NZECP 34:2001.

18. The Project Description also tabulates the operational footprint, and a replaced table is included as **Appendix 2** to this response (the relevant extract is below).

19. This updates two rows of the table at page 7 of the Project Description, as follows (an updated and tracked table included as **Appendix 2**).

	Construction (ha) *Approximate areas*	**Operation (ha)** *Approximate areas*
Road / Transmission Line Between farm boundary at Anderson Road and Waitaha Substation		
Waitaha Road from Anderson Road to SH6 – transmission line ~~and passing places*~~	11~~.1~~*	~~<0.1~~10.7
Waitaha Road from Anderson Road to SH6 – passing bays	<0.1	<0.1
Along SH6, Beach Road and Bold Head Road and to Waitaha substation – transmission line	2.3*	0
Road / Transmission Line Totals Rounded	**13.4**	~~<0.1~~10.8

Landowner comments

20. Westpower appreciate the support of [redacted], who have worked with Westpower over a long period. I also acknowledge the submissions of [redacted]

New Zealand Conservation Authority comments

21. I acknowledge the comments of the New Zealand Conservation Authority (**NZCA**). Westpower tried to contact the NZCA by email, text and phone at least six times between 1 August and October 2025 and received no response beyond an initial acknowledgement of the first email and text messages saying that the person was not available at that time.

Electrocution risk of falcons

22. DOC request deterrents for kārearea/falcons to address electrocution risk. There will be no electrical structures such as transformers on the poles of the 66 kV transmission line. In my 40 years with Westpower involved with the management of 2,244 circuit km of transmission line, I have no knowledge of a kārearea/falcon being found electrocuted or harmed from Westpower's network, although accept that this is possible with the relatively small clearances associated with 11 kV distribution networks and distribution substations of around 150 mm to earth.

23. I consider the clearances involved with the proposed 66 kV line (of the order of 900mm to earth and 3,000 mmm between phases), and the general pole configuration, along with the total lack of pole mounted equipment (apart from insulators) along the line route, to mean there will be no material electrocution hazard created for kārearea/falcon. This is supported in Appendix 21: Terrestrial Fauna Report.[3]

Continuing discussions about access

24. Access to the valley is not within Westpower's control as private property rights are impacted on both sides of the river at the top of the Waitaha Valley and these will need to be resolved separately to resolve public access issues. There are no planned closures affecting access into the Waitaha Valley above Macgregor Creek during operation.

25. Westpower appreciates Poutini Ngāi Tahu support for ongoing discussions outside of this process around improving access to the Waitaha Valley. Westpower support Poutini Ngāi Tahu having an ongoing interest in access and Westpower is willing to be involved in discussions about that with the Department of Conservation and private landowners outside of the processing of this Application for Fast-track approvals.

[3] Appendix-21-terrestrial-fauna-report.pdf, at para [5.2.4].

Regional electricity resilience

26. Mr Westergaard's description of the 23 October 2025 event illustrates the scheme's potential in both shorter and longer emergency outages. I have outlined further context for the Panel why Waitaha will create a unique opportunity to provide broader emergency resilience to the West Coast and Tasman.

Lifeline utility obligations

27. Under the Civil Defence Emergency Management Act 2002 (**CDEM Act**), Westpower is an electricity distributor and must follow its lifeline utility obligations (as is Amethyst Hydro Limited as an electricity generator).[4] This includes:

> **60 Duties of lifeline utilities**
>
> Every lifeline utility must—
>
> (a) ensure that it is able to function to the fullest possible extent, even though this may be at a reduced level, during and after an emergency;
>
> (b) make available to the Director in writing, on request, its plan for functioning during and after an emergency:
>
> (c) participate in the development of the national civil defence emergency management strategy and civil defence emergency management plans:
>
> (d) provide, free of charge, any technical advice to any Civil Defence Emergency Management Group or the Director that may be reasonably required by that Group or the Director.

28. Once Waitaha Hydro Limited is operational, it will also be a lifeline utility.

29. Westpower will consider how best to serve core welfare needs during prolonged outages.[5] It is feasible that Waitaha Hydro Station could, after severe weather events or an Alpine Fault rupture, enable a managed level of supply to the Tasman and West Coast regions during an emergency event.

30. This would require changes to future transmission and distribution network configurations and careful continuity planning. Key locations to serve would be lifeline utilities/critical facilities providing for core needs such as hospitals and other medical facilities, police and fire service stations, disaster relief coordination centres, emergency accommodation, mārae, and essential infrastructure such as water and wastewater treatment plants).

[4] CDEM Act, An entity that generates electricity for distribution through a network or distributes electricity through a network.
[5] With its lifeline utility hat on, and following its duties as a lifeline operator under s 60, of the CDEMA.

Overhead transmission lines

31. A key component of the Project is (as described in the Schedule 2, Fast-track Approvals Act 2024 listing): "a 66 kV transmission route, conveying power from the scheme to the distribution connection point on State Highway 6".[6]

32. Additional material was provided to the Panel on 10 December 2025 about the transmission line following the change of activity status in the Te Tai Poutini Plan – Decisions Version.[7]

33. I also acknowledge the comments of the Department of Conservation about "undergrounding transmission cables where practicable".[8] I assume DOC is referring to the more detailed request in its s 51 and s 53 comments about undergrounding cables by the Power Station and along the access road.[9]

34. Overhead lines provide the only practical engineering solution in this location. For the entire transmission line associated with the Project, overhead lines will provide greater electricity resilience benefits in this area because, where an outage is caused by a network fault, the issue can be promptly visually identified and responded to.

35. This has benefits around fault lines because a major seismic event may compromise an underground transmission network and this can occur anywhere along its length. Once the fault is found on an underground cable, using special cable fault diagnosis equipment, associated repair times are significantly longer than those required for overhead lines, potentially requiring specialist offshore cable jointing resources and humidity controlled environmental chambers because of the high voltages involved. This was certainly the experience gained from the 2011 Christchurch earthquake where Orion's 66 kV underground cable network was extensively damaged, ultimately taking years to fully repair or replace. On the other hand, the overhead transmission network was relatively unscathed and quickly brought back into service.

36. To ensure a quick resolution in an emergency event, be that severe weather (with washouts) or an earthquake, overhead lines allow quicker and more reliable identification of the fault and subsequent return to service. Resilience benefits are a key benefit of the project as discussed in Mr Westgaard's report,[10] and the Application,[11] and in many of the comments received by Ministers. The Application

[6] Described in detail at paragraph 3.3.9 of the Application:
[7] Westpower-Memorandum-5-responding-to-RFI-10-December-2025_Redacted.pdf and attachments.
[8] DOC s 53 comments, at paragraph 19(c).
[9] DOC s 53 comments, paragraph 27; and s 51 comments.
[10] Appendix-16-electricity-resilience-report.pdf.
[11] Waitaha-Hydro-project-substantive-application-documents.pdf

includes overhead transmission lines because they enable the Project to deliver greater electricity resilience benefits considering the Alpine fault in this area.[12]

37. In respect of the transmission line around the Power Station, in addition to electricity resilience benefits, Mr Bentley has addressed the effects of the transmission line in his report and updated information for the Panel.[13]

Regional Benefits

38. I acknowledge the comments from the Minister of Regional Development regarding the relative size of the proposed Waitaha scheme when compared with the likes of the Clyde Dam, but any renewable run-of-the-river local hydro schemes throughout New Zealand would fall into this same category based purely on relative total installed capacity.

39. At 23 MW, the size of the Waitaha Hydro project represents approximately 50% of the current total maximum demand on the Westpower network, and will also provide approximately 50% of the annual energy consumed on the West Coast, representing a major contributor to renewable energy production at a regional level. It will be the largest single generator of electricity on the West Coast.

40. By way of comparison, solar generation on the West Coast would have a capacity factor of around 25% at best compared to a range of 60% to 67% expected from the Waitaha Hydro project,[14] meaning that approximately 55 MW of solar generation would be required to produce the same amount of renewable energy over the same period. And, without battery storage solar generation is unable to provide any contribution toward electricity demands during winter morning and evening peaks when it is most needed, while the Waitaha River will always continue to flow. The Electricity Resilience Report includes the IRENA – Levelized Cost of Energy for Renewable Generation which gives an average capacity factor for hydro, onshore wind, offshore wind, solar and geothermal.[15]

41. Accordingly, while the size of the scheme may be considered modest in a national sense, it will have a significant impact on the resilience of supply and renewable energy

[12] DOC has raised that the historic concession application under the Conservation Act included that the transmission lines around the Power Station would be undergrounded. Westpower has amended the Project design and changed its approach to prioritise electricity resilience over the last 10 plus years.
[13] Appendix-27-landscape-report.pdf; Westpower-Memorandum-2-Attachment-2A.pdf; and Westpower Memorandum 5, Attachment 2 and 2A.
[14] Appendix-16-electricity-resilience-report.pdf. paragraphs 142 and 143; and fasttrack.govt.nz/__data/assets/pdf_file/0011/11063/Appendix-3-project-overview-report-part1.pdf , at 3.10.
[15] Appendix-16-electricity-resilience-report.pdf, from para 106.

production at a regional level and continue to offset material carbon emissions at a national level.

Electricity market updates of relevance

42. Mr Westergaard's report on Electricity Resilience Benefits was finalised in November 2024. To consider the benefits of the project, it may assist the Panel to keep in mind that since then:

    (a) There has been another extreme low inflow sequence impacting hydro storage in early 2025 and decreasing national security of supply, and this was the lowest storage sequence in history.

    (b) Nationally, investment in renewables and battery storage continues, but this does not impact:

        (i) the regional benefits of increased security of supply and reliability, as well as reduced higher spot electricity prices, that the Waitaha Hydro Scheme provides; and

        (ii) the national benefits of displacing thermal generation and reduced CO2 emissions, as addressed above.

43. Westpower appreciates the comments from various Ministers expressing support for the Project. In respect of the electricity market and regional resilience benefits, the comments of the Minister for Energy and Climate Change are well summarised. Hon. Simon Watts states that significant regional benefits of the Waitaha Hydro Scheme are the:

    (a) significant contribution 23 MW is expected to deliver to the West Coast, supplying approximately half of the West Coast's average annual electricity needs; and

    (b) that further renewable energy generation *of this scale* supports multiple outcomes including contributing to displacing thermal generation, increasing security of energy supply, and downward pressure on wholesale electricity prices supporting affordable energy for New Zealand firms and households.[16]

44. I agree with those comments.

Rodger Griffiths

[16] Hon. Simon Watts, Letter to Expert Panel, 19 December 2025, pg 1.

Appendix A: Correspondence with West Coast Fish and Game Council

Martin [redacted]

From: [redacted]ishandgame.org.nz>
Sent: Thursday, 24 April 2025 8:39 am
To: Martin Kennedy
Subject: RE: Consultation re Waitaha Project

Hi Martin

Yes, that is an accurate summary of your consultation regarding the Waitaha Hydro Electric Power Scheme. Best of luck with your proposal.

Ngā mihi

[redacted] Manager

West Coast Fish and Game Council
2 Bert Mercer Drive | Hokitika 7810
P +64 3 755 8546 | [redacted]
W www.fishandgame.org.nz

From: Martin Kennedy [redacted]
Sent: Tuesday, 15 April 2025 11:11 am
To: [redacted]fishandgame.org.nz>
Subject: Consultation re Waitaha Project

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi [redacted]

Thanks for the discussion last Tuesday, 8th April, regarding the project and its history to this point. As discussed as part of the Fast Track application process Westpower is consulting with a range of parties, including Fish & Game New Zealand. We appreciate your confirmation that the West Coast Fish and Game Council is the appropriate point of contact for consultation as the project is located within the area it administers.

From our discussion, as I understand it, WCF&G;

- are the appropriate entity to consult with,
- consider each project on its merits,
- have been aware of the project since the initial concession process,
- do not consider that, provided the scheme proceeds as currently proposed, there are any more than minor effects on the matters of interest to the Council,
- does not require further consultation in this regard.

Is that a reasonable summary of our discussion or are amendments/further comments required.

We want to ensure it is an accurate and fair representation of the outcome of the discussion as it will be included in the consultation section of the application if nothing further is required.

I am happy to discuss any issues with you if that will assist.

Thanks for your time and assistance in this regard.

Martin Kennedy
West Coast Planning Ltd
[redacted]
Greymouth 7805

Phone: [redacted]
Mobile [redacted]
Email: [redacted]

Appendix B: Updated transmission line operational footprint in Project Description table (pages 53 – 55 of the PDF report, see link: Appendix 3 project overview report part1)

	Construction (ha) *Approximate areas*	**Operation (ha)** *Approximate areas*
Headworks/Intake Area		
Weir	< 0.1	< 0.1
Intake Channel (including Sluice Channel)	0.2	0.2
Intake Structure and Intake Portal	< 0.1	< 0.1
Tunnel Portal, Intake Accessway and River Protection	< 0.1	< 0.1
Road to Construction Staging Area 1	< 0.1	0
Construction Staging Area 1	0.7	0
Test Drilling Site (x 4)	< 0.1	0
Intake Totals Rounded	**1.2**	**0.3**
Power Station Area		
Power Station, Control Room, Switchyard	< 0.1	< 0.1
Hard fill area between power station, access road and tunnel portal	0.3	0.3
Tailrace & tailbay	0.2	0.2
Retaining wall, river protection, access ramp	0.1	0.1
Slope protection works	< 0.1	< 0.1
Construction Staging Area 2 (including temporary staging road and riverside flood protection)	0.8	0
Test Drilling Site (x 3)	< 0.1	0
Power Station Totals Rounded	**1.6**	**0.7**
Road / Transmission Line between farm boundary at Macgregor Creek and the power station site		

	Construction (ha) *Approximate areas*	**Operation (ha)** *Approximate areas*
Transmission Line (where separate from the road)	0.6	0.6
Access Road (where separate from transmission line)	0.6	0.6
Access Road and Transmission Line (running in parallel)	3.2	2.7
Waterway Training and Flood Protection at Alpha Creek	0.2	0.1
Road / Transmission Line Totals Rounded	**4.6**	**4.0**
Farm		
Construction Staging Area 3 and Spoil Disposal Areas	20.3	0
Farm boundary at Macgregor Creek to farm boundary at Anderson Road – access road	2.15	2.15
Farm boundary at Macgregor Creek to farm boundary at Anderson Road – transmission line	2.15	2.15
Farm boundary at Macgregor Creek to farm boundary at Anderson Road – transmission line and access road adjacent	2.6	2.2
Gravel Screening area	0.8	
Farm Totals Rounded	**28**	**6.5**
Road / Transmission Line **Between farm boundary at Anderson Road and Waitaha Substation**		
Waitaha Road from Anderson Road to SH6 – transmission line ~~and passing places *~~	11~~.1~~*	~~<0.1~~10.7
Waitaha Road from Anderson Road to SH6 – passing bays	<0.1	<0.1
Along SH6, Beach Road and Bold Head Road and to Waitaha substation – transmission line~~*~~	2.3*	0
Road / Transmission Line Totals Rounded	**13.4**	**~~<0.1~~10.8**

** 11~~.1~~ ha and 2.3 ha accounts for the entire transmission corridor. During construction, actual disturbance will be limited to approximately 1-2 ha which is the area around the transmission poles.*