



REGULATION AND COMPLIANCE DIVISION

Level 7, 11 Waymouth Street,
Adelaide SA 5000

GPO Box 618
Adelaide SA 5001

Tel 08 8463 3000
ABN 83 768 683 934
www.energymining.sa.gov.au

24th July 2026

Ms Brigitte Williams

By email: development@urps.com.au

Request for Information

Applicant: Australian Naval Infrastructure and ElectraNet

Application ID: 26016431

Consent: Planning and Land Division Consent

Proposed Development: Alterations and extension to the Pelican Point Substation; construction of a new substation east of Lefevre Substation; relocation and undergrounding of 275kV electricity transmission lines; and tree damaging activity

Subject Land:

762 -776 MERSEY RD N OSBORNE SA 5017

Title and Parcel

Title Ref: CT 6231/3 **Plan Parcel:** D121984 AL506 **Additional Location Information:** Council:
City Of Port Adelaide Enfield

778 MERSEY RD N OSBORNE SA 5017

Title and Parcel

Title Ref: CR 6011/467 **Plan Parcel:** D76309 AL22 **Additional Location Information:** Council:
City Of Port Adelaide Enfield

LOT 3003 MERSEY RD N OSBORNE SA 5017

Title and Parcel

Title Ref: CT 6316/815 **Plan Parcel:** D136949 AL3003 **Additional Location Information:**
Council: City Of Port Adelaide Enfield

LOT 28 PELICAN POINT RD OUTER HARBOR SA 5018**Title and Parcel**

Title Ref: CT 6322/501 **Plan Parcel:** D52266 AL28 **Additional Location Information:** Council: City Of Port Adelaide Enfield

LOT 28 PELICAN POINT RD OUTER HARBOR SA 5018**Title and Parcel**

Title Ref: CT 6322/502 **Plan Parcel:** D52266 AL29 **Additional Location Information:** Council: City Of Port Adelaide Enfield

Dear Brigette,

This development was referred to the Department for Energy and Mining (DEM) in accordance with section 122 of the *Planning Development and Infrastructure Act 2016* and Regulation 41 and Item 9B in the table in Clause 3 of Schedule 9 of the *Planning, Development and Infrastructure (General) Regulations 2017* as the subject land is within the Gas and Liquid Petroleum Pipelines Overlay (**Overlay**) in the Planning and Design Code (**Code**).

The proposed development is within the vicinity of the below pipelines, licensed under the Energy Resources Act 2000 (ER Act).

Pipeline License (PL)	The Licensee	The Pipeline
PL 1	Epic Energy	Moomba-Adelaide Pipeline
PL 13	South East Australia (SEA) Gas	Port Campbell-Adelaide Pipeline

The matters to which this referral relates are to provide expert assessment and direction to the relevant authority in relation to potential risks associated with the proposed development with respect to:

- potential safety issues relating to the proposed development; and/or
- the potential for the development to adversely impact upon the lawful continued operation of strategic infrastructure (gas pipelines).

In providing this response, DEM has had regard to the Desired Outcome in the Overlay (DO 1), being the management of risk to public safety, the environment and security of energy supply from the encroachment of development on strategic gas and liquid petroleum pipelines.

Regard has also been had to the ER Act, *Energy Resources Regulations 2013* (**ER Regulations**), and Australian Standard 2885: *Pipelines – Gas and Liquid Petroleum* (**AS 2885**), particularly as they relate to matters of safety (as referred to in DO 1) and the lawful continued operation of the Pipeline.

DEM requires further information to assess the development against:

- DO 1 of the Gas and Liquids Petroleum Pipelines Overlay: Management of the risk to public safety, the environmental and security of energy supply for the encroachment of development of strategic gas and liquid petroleum pipelines.

Further information is required to be able to fully assess the risks associated with this development, as it is anticipated that the proposed development will introduce new external interference threats to the pipelines which need to be controlled.

DEM request that the applicant provide a detailed description of the activities to be undertaken in relation to the proposed development that may impact on the pipelines, and demonstration of how any impact on the safe and lawful operation of the pipelines will be prevented. This information should include:

- Information to enable the identification of any new threats that the proposed development may pose to the pipeline infrastructure, such as:
 - o drawings or details of any service crossings of the pipelines
 - o drawings or details of other installations (above or below ground) within 6m of the pipelines
 - o drawings or details of modification road or stormwater drainage within 6m of the pipelines
 - o sizing and nature of earthmoving equipment to be used for the development (excavators, augers, drilling, vibration inducing equipment)
 - o installations such as high voltage power lines and equipment which may create induced currents and increase corrosion risk to the pipelines
- Details of any controls or considerations incorporated into the design to prevent or minimise impact to the safe and lawful operation of the pipelines.

The recommended way to fulfil the request above would be through engagement with the pipeline operators to undertake a Safety Management Study (SMS) (as per the requirements of AS2885.6:2018) specific to this development. This SMS would identify controls required to manage the change in risk of the pipeline operation arising from the proposed development. The controls identified may form the basis of DEM's conditions of approval for the development.

It is anticipated given the nature of the proposed development, that EPR (Earth Potential Rise), LFI (Low-Frequency Induction), and AC interference studies will be required – this requirement will be confirmed by the SMS.

This information must be provided within 60 business days of the date of this letter. If you require additional time to provide the information, please contact the Authority on the details below as soon as possible to allow for consideration of your request. Please note failure to provide the requested information may result in refusal of your application.

The Pipelines are licenced to Epic Energy and SEA Gas. Direct contact with the Licensees on this matter, to **organise the required Safety Management Study**, should be through:

- Epic Energy: Brian OCallaghan *via email at:* brian.ocallaghan@epic.com.au, Adrian.Tero@epic.com.au, sekti.nugroho@epic.com.au, ben.whelan@verbrec.com and land.management@epic.com.au
- SEA Gas: Anthony Cobiac *via email at:* anthony.cobiac@seagas.com.au and development.application@seagas.com.au

If you have any queries in relation to this matter, please contact Joe Ward on 0884 292 327 or via email at joseph.ward@sa.gov.au

Yours sincerely,



Michael Malavazos
Director Energy Regulation
Energy Resources Division
Department for Energy and Mining

Planning, Development and Infrastructure Act 2016 & Planning, Development and Infrastructure (General) Regulations 2017	Section 119(3) / Regulation 34
Due Date	24 October 2026



URPS

Adelaide
27 Halifax Street
Adelaide SA 5000
08 8333 7999

urps.com.au

ADL | MEL | PER | BNE

19 August 2026

Fiona Sellick
Senior Planner, Crown and Impact Assessment
Planning and Building Division
Department for Housing and Urban Development

fiona.selleck@sa.gov.au

Dear Fiona

Response to DEM Referral: ANI 275kv DA 26016431

Introduction

URPS continues to act on behalf of Australian Naval Infrastructure (ANI) and ElectraNet for DA 26016431 this DA involves:

Alterations and extension to the Pelican Point Substation; construction of a new substation east of Lefevre Substation; relocation and undergrounding of 275kV electricity transmission lines.

The development application has been referred to the Department of Energy and Mining (DEM) for comment as the as the subject land is within the Gas and Liquid Petroleum Pipelines Overlay in the Planning and Design Code.

This letter responds to the Request For Information (RFI) sought by DEM in connection with that referral.

Response to RFI

The proposed development includes the installation of new underground 275kV electricity transmission circuits, substation infrastructure and associated civil works. These works create a number of interface locations with existing and proposed SEA Gas and Epic Energy pipeline assets.

ElectraNet has been working collaboratively with ANI, SEA Gas and Epic Energy for approximately 12 months to coordinate utility relocations, identify interaction locations and develop integrated designs.

Regular design coordination meetings and utility interface workshops have been undertaken and continue throughout detailed design and planning.

The attached table in **Appendix A** provides a response to each item raised in the RFI.

This table outlines the significant background work undertaken with Epic Energy and Sea Gas for the relocation of existing utilities infrastructure. This is required to enable the construction of the NPSCY at Osborne.

Importantly, it confirms the projects commitment to continue discussions with Epic Energy and Sea Gas as the design develops.

ANI and ElectraNet acknowledge the need for a Safety Management Study (SMS) to be undertaken. We request that this study be imposed as a condition of approval. This allows the study to take place concurrent to the projects detail design.

Conclusion

The information provided addresses DEM's request and confirms active coordination with both pipeline operators.

ANI and ElectraNet will continue this coordination with SEA Gas and Epic Energy as the design progresses.

The SMS should be secured through a condition of approval. This approach aligns the study with the detailed design stage. Crossing details, construction methods and technical assessments will then be available. The SMS can therefore assess confirmed interfaces and identify appropriate controls before works commence.

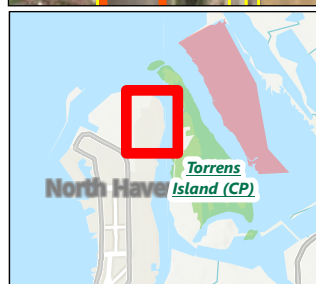
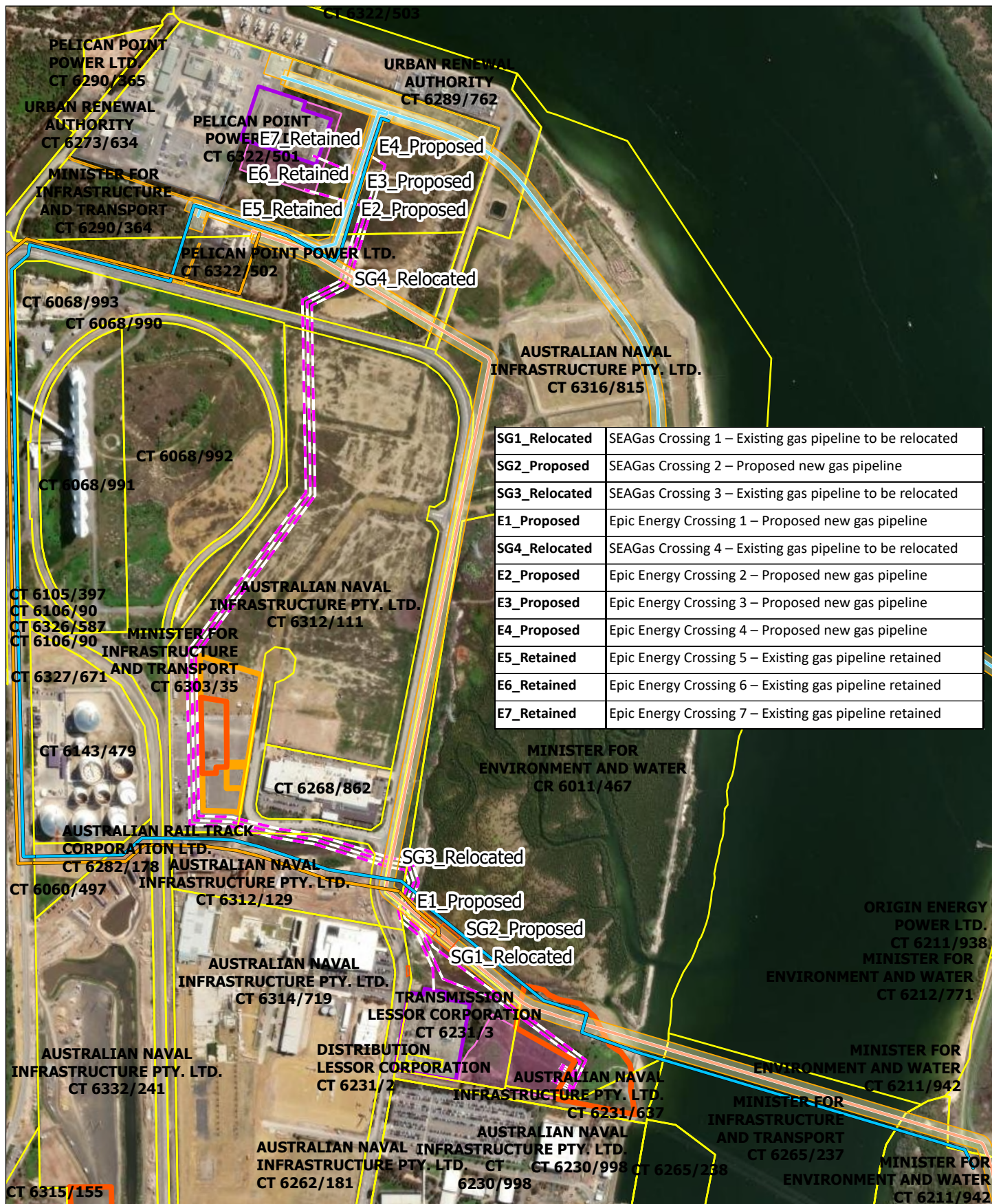
Please call me if you have any questions on 8333 7999.

Yours sincerely



Brigitte Williams
Senior Consultant

Map 1 - Overview



- 275kV UG Line
- Existing Gas Pipelines
- South East Australia Gas Pty Ltd
- Epic Energy SA Pty Ltd
- Proposed new gas pipeline
- South East Australia Gas Pty Ltd
- Epic Energy SA Pty Ltd
- Existing Gas Easement
- Cadastre
- Electranet Compound
- Other Compounds
- Substation Footprint
- ENET - Existing
- Planned
- SAPN

electranet

0 100 200 300 400

Metres

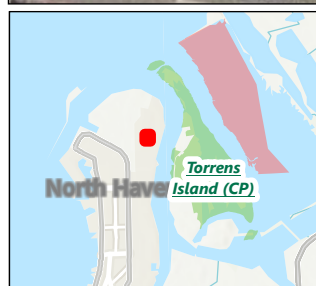
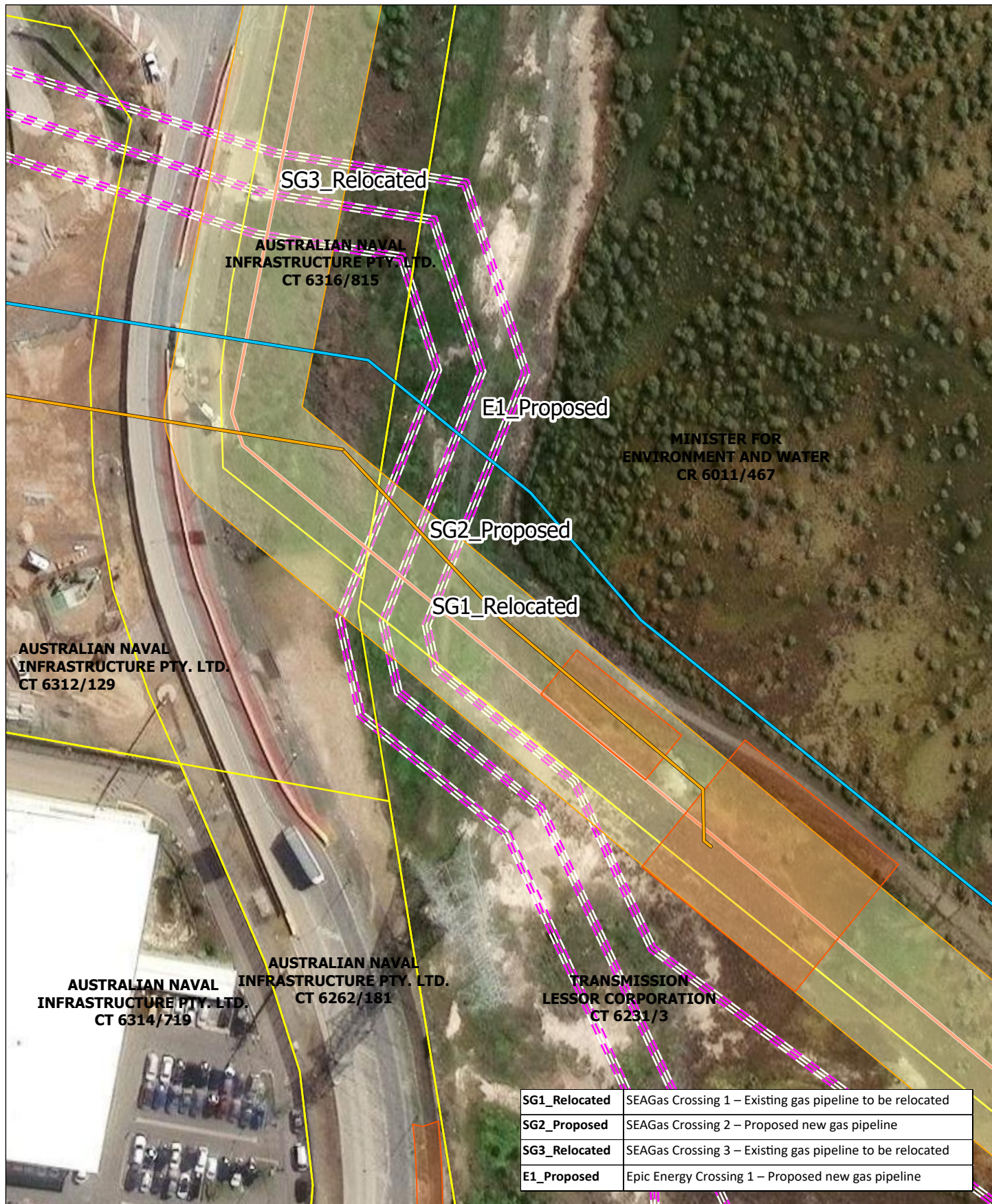
1:9,000 (A4) / GDA2020 MGA Zone 54

Security Classification: Commercial in Confidence
Distribution: Internal, ENGIE

The information on this drawing is subject to ElectraNet copyright and is not to be copied in whole or in part without the written approval of the asset owner. Information on this drawing is UNCONTROLLED, therefore accuracy can not be guaranteed and is to be used as a guide only.

Date: 14.08.2026

Area 1 Gas Pipeline Crossings (Mutton Cove)



- - - 275kV UG Line
- Existing Gas Pipelines
- South East Australia Gas Pty Ltd
- Proposed new gas pipeline
- South East Australia Gas Pty Ltd
- Epic Energy SA Pty Ltd
- SEAGas Facilities
- Existing Gas Easement
- Cadastre

electranet

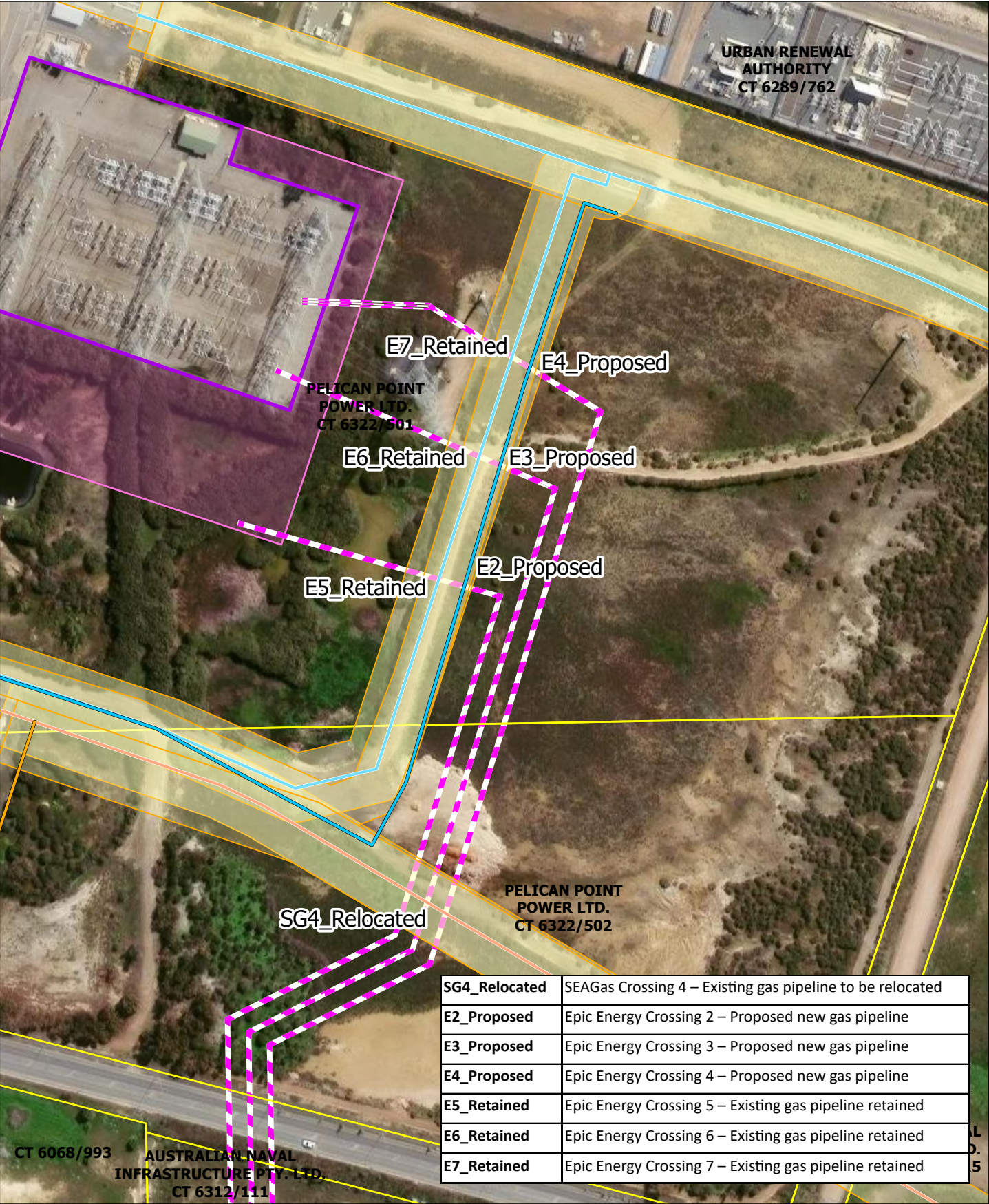
0 20 40
Metres
1:1,000 (A4) / GDA2020 MGA Zone 54

Security Classification: Commercial in Confidence
Distribution: Internal, ENGIE

The information on this drawing is subject to ElectraNet copyright and is not to be copied in whole or in part without the written approval of the asset owner. Information on this drawing is UNCONTROLLED, therefore accuracy can not be guaranteed and is to be used as a guide only.

Date: 14.08.2026

Area 3 Gas Pipeline Crossings (Pelican Point)



- 275kV UG Line
- Existing Gas Pipelines
- South East Australia Gas Pty Ltd Substation Footprint
- Epic Energy SA Pty Ltd
- Proposed new gas pipeline
- South East Australia Gas Pty Ltd
- Epic Energy SA Pty Ltd
- Existing Gas Easement
- Cadastre
- ENET - Existing
- Planned
- SAPN

electranet

0 25 50 75 Metres

1:2,000 (A4) / GDA2020 MGA Zone 54

Security Classification: Commercial in Confidence
Distribution: Internal, ENGIE

The information on this drawing is subject to ElectraNet copyright and is not to be copied in whole or in part without the written approval of the asset owner. Information on this drawing is UNCONTROLLED, therefore accuracy can not be guaranteed and is to be used as a guide only.

Date: 14.08.2026

Table Response to RFI comments

Request Detail	Response
A detailed description of the activities to be undertaken in relation to the proposed development that may impact on the pipelines, and demonstration of how any impact on the safe and lawful operation of the pipelines will be prevented.	The proposed development includes the installation of new underground 275kV electricity transmission circuits, substation infrastructure and associated civil works. These works create a number of interface locations with existing and proposed SEA Gas and Epic Energy pipeline assets. ElectraNet has been working collaboratively with ANI, SEA Gas and Epic Energy for approximately 12 months to coordinate utility relocations, identify interaction locations and develop integrated designs. Regular design coordination meetings and utility interface workshops have been undertaken and continue throughout detailed design and planning. Impacts to the safe and lawful operation of the pipelines will be managed through: • Ongoing design coordination with SEA Gas and Epic Energy. • Development of agreed crossing arrangements and service clearances. • Utility-specific crossing agreements and construction interface agreements. • Completion of crossing-specific risk assessments and studies as required by the pipeline operators. • Incorporation of agreed controls into final design and construction methodologies prior to works commencing.
Information to enable the identification of any new threats that the proposed	ElectraNet has prepared a series of gas pipeline interface plans identifying all locations where proposed underground electricity infrastructure interfaces with retained, relocated and proposed gas pipeline infrastructure.

Table Response to RFI comments

development may pose to the pipeline infrastructure.

- drawings or details of any service crossings of the pipelines
- drawings or details of other installations (above or below ground) within 6m of the pipelines
- drawings or details of modification road or stormwater drainage within 6m of the pipelines
- sizing and nature of earthmoving equipment to be used for the development (excavators, augers, drilling, vibration inducing equipment)
- installations such as high voltage power lines and equipment which may create induced currents and

These interaction locations are being referenced as:

- SG1_Relocated - UG cable crossing of an existing SEA Gas pipeline that will be relocated in the future
- SG2_Proposed - UG cable crossing of a new SEG Gas pipeline
- SG3_Relocated - UG cable crossing of an existing SEA Gas pipeline that will be relocated in the future
- E1_Proposed - UG cable crossing of a new Epic Energy Gas pipeline
- SG4_Relocated - UG cable crossing of an existing SEA Gas pipeline that will be relocated in the future
- E2_Proposed - UG cable crossing of a new Epic Energy Gas pipeline
- E3_Proposed - UG cable crossing of a new Epic Energy Gas pipeline
- E4_Proposed - UG cable crossing of a new Epic Energy Gas pipeline
- E5_Retained - UG cable crossing of an existing Epic Energy pipeline that is remaining in-situ
- E6_Retained - UG cable crossing of an existing Epic Energy pipeline that is remaining in-situ
- E7_Retained - UG cable crossing of an existing Epic Energy pipeline that is remaining in-situ

An overview interaction plan has been prepared and additional detailed crossing plans are being produced for each interaction area.

Table Response to RFI comments

increase corrosion risk to the pipelines

Detailed utility coordination is currently being undertaken between ElectraNet, SEA Gas and Epic Energy using federated design models. This process identifies all utility infrastructure interfaces and confirms clearances between services. Detailed design information for installations within proximity of gas pipeline infrastructure will be provided through the coordinated design package.

Road, drainage and access infrastructure at interface locations are being coordinated directly with the pipeline operators.

Specific examples include:

- Design and coordination of the access track to the SEA Gas Main Line Valve (MLV) station at Mutton Cove.
- Coordination of stormwater drainage and access track arrangements adjacent to pipeline infrastructure.
- Review and agreement of depth of cover requirements and drainage arrangements between utility owners.

Detailed plans will be provided as part of ongoing design development.

Construction methodology development is currently underway as part of detailed design. ElectraNet, Enerven, SEA Gas and Epic Energy are coordinating construction staging and interface requirements through regular utility coordination meetings.

Table Response to RFI comments

	Plant selection, excavation methods, drilling requirements, access arrangements and any vibration-inducing activities will be assessed through crossing-specific construction planning and associated risk assessments prior to commencement of works. The proposed development includes new underground 275kV electricity transmission circuits which will interface with existing and proposed gas pipeline infrastructure. ElectraNet acknowledges the potential for electromagnetic interaction and induced current effects. Assessment of potential impacts associated with Earth Potential Rise (EPR), Low Frequency Induction (LFI), AC interference and associated corrosion risks will be undertaken in consultation with SEA Gas and Epic Energy as required by the pipeline operators and informed by the Safety Management Study process.
Details of any controls or considerations incorporated into the design to prevent or minimise impact to the safe and lawful operation of the pipelines.	Controls currently incorporated into the project include: • Ongoing design coordination with SEA Gas and Epic Energy. • Development and maintenance of a coordinated federated utility model. • Agreement of crossing arrangements and minimum service clearances. • Coordination of relative levels between utilities. • Coordination of construction staging and access requirements. • Development of crossing-specific agreements between utility owners.

Table Response to RFI comments

	• Class A survey investigations at selected crossing locations to confirm design levels. • Ongoing engagement with landowners and infrastructure operators regarding specific crossing arrangements. Additional controls identified through detailed design, SMS processes and technical assessments will be incorporated into the final design and construction documentation.
The recommended way to fulfil the request above would be through engagement with the pipeline operators to undertake a Safety Management Study (SMS) (as per the requirements of AS2885.6:2018) specific to this development.	ElectraNet acknowledges DEM's recommendation that engagement with the pipeline operators be undertaken to complete a Safety Management Study (SMS) in accordance with AS2885.6:2018. ElectraNet is actively working with SEA Gas and Epic Energy on utility interface planning and anticipates that crossing-specific SMS activities will be undertaken in consultation with the relevant pipeline operators as designs progress and crossing agreements are finalised.
It is anticipated given the nature of the proposed development, that EPR (Earth Potential Rise), LFI (Low-Frequency Induction), and AC interference studies will be required – this requirement will be confirmed by the SMS.	ElectraNet acknowledges DEM's advice that Earth Potential Rise, Low Frequency Induction and Alternating Current interference studies may be required and that this requirement will be confirmed through the SMS process. These studies have not yet been completed; however, ElectraNet commits to undertaking any studies required by SEA Gas, Epic Energy and the outcomes of the SMS process prior to construction and energisation of the proposed infrastructure.

Table Response to RFI comments

We will assess, verify and appropriately manage alternating current (AC) interference, including Low Frequency Induction (LFI) and Earth Potential Rise (EPR), where the proposed works cross or run parallel to gas transmission or steel distribution mains. All assessments, design measures and works will comply with AS/NZS 4853:2012 – Electrical hazards on metallic pipelines, together with any additional requirements of the relevant gas infrastructure owner.

This information will be incorporated into the detailed design and risk management framework for the project.