

Options Evaluation Report (OER)

Transmission Line Asbestos Paint

OER- 000000001164 revision 2.0

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Project category: Prescribed - Network-Other

Approvals

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Change history

Revision	Date	Amendment
00	26 October 2021	Initial Review
01	13 October 2022	Updated evaluation of options based on AER comments
02	31 October 2022	Revision number updating

Executive summary

Several Transgrid transmission line structures have coatings containing asbestos. Transgrid has a duty of care to inspect, register, monitor and control asbestos in the workplace under Work Health and Safety rules. This extends to transmission line assets in Transgrid's electricity network.

Transgrid has commissioned GHD Pty Ltd (GHD) to assess paint coatings on transmission tower legs suspected of containing asbestos per Transgrid's Asbestos Management Plan. An inspection of structures has been undertaken to determine the paint condition across all towers, ranging from good to poor condition.

The third stage of the asbestos remediation program conducted in 2019 involved testing the remaining transmission line structures in the network which have not yet been tested. Those structures suspected of containing asbestos paint based on past inspections and other anecdotal evidence would be prioritised for identification and corrective works. The current stage of testing is being finalised with findings recorded in Transgrid's Asbestos Register.

Transgrid's Asbestos Register classifies the safety risk from asbestos affected structures into the categories of High, Medium, Low and Negligible as per the advice provided by GHD in Table 1. This is understood to be in line with the asbestos health and safety legislative requirements, as set out by Safe Work NSW.

Table 1 Priority Matrix

Risk Rating	Risk Category	Remediation Priority
0-250	Low	Maintain in good condition or greater than 5 years. This reflects the potential exposure to workers from maintenance activities which is considered prudent.
250-375	Medium	3-5 years
375-500	High	1-3 years
500-600	Very High	As soon as reasonably practicable (Less than 1 year)

Transgrid previously identified, recorded and removed asbestos in affected structures classified as very high risk and high risk over the 2019-2023 period. This Need addresses the remaining asbestos affected structures classified as medium risk and low risk. Structures classified with a risk rating of zero are excluded from this program as asbestos paint has not been detected on these towers.

Transgrid has multiple regulatory safety obligations that relate to the management of asbestos containing material. This Need will permanently eliminate the safety risk from managing and controlling asbestos that Transgrid's workforce and general public is exposed to for the remaining life of the transmission line structure.

The main driver for the need to remediate these issues is to manage network safety risk levels to 'As Low As Reasonably Practicable' under Transgrid's regulatory obligations and business risk appetite. Under the Electricity Supply (Safety and Network Management) Regulation 2014 Section 5, 'A network operator must take all reasonable steps to ensure the design, construction, commissioning, operation and

decommissioning of its network (or any part of its network) are safe'. It follows that there is a compliance need for this project.

The assessment of the options considered to address the need/opportunity appears in Table 2

Table 2 Evaluated options

Option	Description	Direct capital cost (\$m)	Network and corporate overheads (\$m)	Total capital cost ¹ (\$m)	Weighted NPV (PV, \$m)	Rank
Option A	In the 2024-2028 regulatory period, remediate all asbestos affected structures which fall under the medium risk category, and structures that fall on the border of medium risk and low risk prioritisation category. Inspect all remaining structures identified as low risk. In the 2029-2033 regulatory period remediate the remaining structures prioritised as low risk.	29.03	3.7	32.73	120.97	2
Option B	Remediate all asbestos affected structures under medium risk and low risk prioritisation categories in 2024-2028.	29.88	3.69	33.57	128.46	1

Option B is the preferred option because it is technically and commercially feasible with the highest positive Net Present Value (NPV). Option B also meets the ALARP requirement. Option B is further supported by Section 6.2.1 Consideration of SFAIRP and ALARP Principles of Industry Practice application note Asset Replacement Planning, which states “if it is not grossly disproportionately uneconomic to do so, then the source of the risk should be eliminated”.

Option B will ensure:

- Worker safety risk and subsequently public safety risk is managed to ALARP as required to satisfy work health and safety, and network safety regulatory obligations; and
- The safety of Transgrid’s workforce is protected.

It is recommended that Option B be scoped in detail and progressed from DG1² to DG2.

¹ Total capital cost is the sum of the direct capital cost and network and corporate overheads. Total capital cost is used in this OER for all analysis.

² DG stands for decision gate and refers to internal Transgrid processes.

1. Need/opportunity

Several Transgrid transmission line structures have coatings containing asbestos with inspections identifying a varied paint condition across all towers, ranging from good to poor condition.

Transgrid has duty of care to inspect, register, monitor and control asbestos in the workplace in line with work health and safety regulations, a variety of network codes and industry standards. This responsibility extends to the transmission line assets which operate as a part of Transgrid's electricity network. It follows that there is a compliance need for this project.

Transgrid has commissioned GHD Pty Ltd (GHD) to undertake an assessment of paint coatings on transmission tower legs suspected of containing asbestos per the Transgrid's Asbestos Management Plan.

Testing has been undertaken on paint samples on a number of suspected transmission lines in three stages:

- Stage 1: Conducted early to mid-2016, testing covered Lines 8, 11, 16, 23, 27, 28 and 959/92Z, and sections of Lines 76/77 and 39.
- Stage 2: Conducted in late 2016 to mid-2017, testing primarily covered sample towers on the large majority of lines constructed prior to 1980, based on historical and anecdotal evidence of the asbestos paint use.
- Stage 3: Conducted in 2019 to mid 2020, testing covers the remaining transmission line towers on the network that have not been tested, with those suspected of containing asbestos paint based on inspection information and other anecdotal evidence prioritised. This stage of testing is being finalised.

Paint samples were taken at ground level below the climbing deterrent installation and were limited to assessing paint coatings of the tower legs. The samples were tested for asbestos where a proportion of the paint samples analysed were subsequently found to contain asbestos.

All required information dictated in Transgrid's Asbestos Management Plan is recorded in Transgrid's Asbestos Register. GHD has developed a remediation priority matrix and calculated the risk score for each affected structure. The score is a weighted sum of risk ratings given to material risk based on the condition of the paint and area covered, and the location and accessibility of the relevant structures. The remediation priority matrix is shown in Table 3 below.

Table 3 Remediation Priority Matrix

Risk Rating	Risk Category	Remediation Priority
0-250	Low	Maintain in good condition or greater than 5 years. This reflects the potential exposure to workers from maintenance activities which is considered prudent.
250-375	Medium	3-5 years
375-500	High	1-3 years
500-600	Very High	As soon as reasonably practicable (Less than 1 year)

Transgrid identified, removed and recorded the asbestos affected structures classified as very high risk and high risk in the 2019-2023 period. This need addresses the remaining asbestos affected structures classified as medium and low.

Taking GHD’s advice into consideration, the asbestos subject matter expert, Transgrid proposes to undertake the following to address and manage the asbestos paint issue:

- The very high and high risk category towers are to have the asbestos containing paint removed such that the condition of the asbestos containing material is improved within one to three years of being identified.
- The medium risk towers are to have the asbestos containing paint removed such that the condition of the asbestos containing material is improved within three to five years of being identified, or have their accessibility reduced. Transgrid does not typically consider access reduction a feasible option, as this would prevent routine maintenance activities and other maintenance activities on the structure and easement. The expected required by dates of these structures range from 2023 to 2025.
- The low risk towers are to have the asbestos containing paint removed such that the condition of the asbestos containing material is improved within five years of being identified or reassessed for condition with an associated review of its risk rating and risk category. Structures with a risk score of 250 are identified as low, when they are on the border of the two risk categories – Medium and Low. Consequently, structures with risk score of 250 will be prioritised first in the low category. The expected remediation dates for these structures are from 2025 onwards. This category does not include structures that have a risk rating of 0 as these structures do not contain asbestos paint.

The accessibility criteria used to derive the scores only considers public access. It does not consider operational needs for tower maintenance activities. Hence, it is proposed for the low risk towers to be removed to eliminate the risk to worker safety and public.

- No further action is required on negligible risk towers as there is no asbestos paint identified.

The prioritisation matrix outlined above is understood to satisfy current asbestos health and safety legislative requirements as set out by Safe Work NSW.

Transgrid has multiple regulatory safety obligations that relate to the management of asbestos containing material. Primarily, Transgrid has the “primary duty of care” and “must eliminate risks arising from managing and controlling asbestos, or if that is not reasonably practicable, minimise the risks so far as is reasonably practicable”. This need will permanently eliminate the safety risk from managing and controlling asbestos that Transgrid’s workforce is exposed to for the remaining life of the transmission line structure.

A list of all regulatory safety obligations is stated in Table 4.

Table 4 List of regulatory safety obligations

Identified need	Common sources of identified needs
Regulatory compliance	<p>Network safety – Obligation for network operators to ensure safety of Transgrid workforce under:</p> <ul style="list-style-type: none"> • NSW Work Health Safety and Regulations 2017 • Safe Work Australia Code of Practice How to Manage and Control Asbestos in the Workplace 2020 • Electricity Supply (Safety and Network Management) Regulation 2014 (NSW)

Identified need	Common sources of identified needs
	<ul style="list-style-type: none"> Utilities (Technical Regulation) (Electricity Transmission Supply Code) Approval 2016 (No 1) (ACT) Australian Standard AS5577-2013: Electricity Network Safety Management Systems <p>NSW Work Health Safety and Regulations 2017 35 Managing risks to health and safety A duty holder, in managing risks to health and safety, must— (a) eliminate risks to health and safety so far as is reasonably practicable, and (b) if it is not reasonably practicable to eliminate risks to health and safety— minimise those risks so far as is reasonably practicable.</p> <p>Safe Work Australia Code of Practice How to Manage and Control Asbestos in the Workplace 2020 Section 1.2: Who has health and safety duties in relation to managing and controlling asbestos or ACM? A PCBU must eliminate risks arising from managing and controlling asbestos, or if that is not reasonably practicable, minimise the risks so far as is reasonably practicable.</p> <p>Electricity Supply (Safety and Network Management) Regulation 2014 (NSW) Section 5: 'A network operator must take all reasonable steps to ensure that the design, construction, commissioning, operation and decommissioning of its network (or any part of its network) is safe.</p> <p>Utilities (Technical Regulation) (Electricity Transmission Supply Code) Approval 2016 (No 1) (ACT)</p> <ul style="list-style-type: none"> 2.2 (3): Ensure the safe management of the electricity transmission network to avoid injury to any person or damage to property and the environment. <p>Australian Standard AS5577-2013: Electricity Network Safety Management Systems 1.2 (e) Hazards associated with the design, construction, commissioning, operation, maintenance and decommissioning of electrical networks are identified, recorded, assessed and managed by eliminating safety risks so far as is reasonably practicable, and if it is not reasonably practicable to do so, by reducing those risks to as low as reasonably practicable.</p>

2. Related needs/opportunities

The relevant needs that contain structures that overlap with the scope of this need is provided in Table 5.

Table 5 Overlap with existing needs

Related Needs	Transmission Line	Overlap - Medium Structures	Overlap - Medium Legs	Overlap - Low Structures	Overlap - Low Legs
1600	11	5	12	12	16
1272	13	5	11	0	0
1353	16	17	40	26	42

Related Needs	Transmission Line	Overlap - Medium Structures	Overlap - Medium Legs	Overlap - Low Structures	Overlap - Low Legs
2525	26/29	1	1	1	3
TOTAL		28	64	39	61

3. Options

3.1. Base case

The base case is to ‘do nothing’, that is not to remove asbestos on the affected structures. The base case risk cost is \$4.65 million. The probability of failure is determined as the probability that an asbestos paint material is dislodged or become air-borne once disturbed. The probability of failure for structure legs or structure classified as medium is 0.4, and 0.2 for those classified as low.

The base case is not acceptable in managing the worker safety risk to as low as reasonably practicable when an option is available to reduce/remove the risk. Transgrid has a “very low” tolerance for safety risks. That is, Transgrid’s management is expected to establish the appropriate controls and take actions to reduce the likelihood of a negative outcome as much as reasonably practicable.

3.2. Options evaluated

Option A — Remediate all asbestos affected structures which fall under the medium risk prioritisation category in 2024-2028, and structures that fall on the border of medium and low risk prioritisation categories. Inspect all remaining structures identified as low risk. In 2029-2033, remediate the remaining structures prioritised as low risk. [[NOSA N1164](#), [OFS 1164A](#)]

The scope of this option is:

1. Removal of contaminated legs on all medium risk structures in 2024-2028 regulatory period (1072 structures).
2. Removal of contaminated legs on structures on the borderline of medium risk and low risk categories in 2024-2028 regulatory period (43 structures).
3. Inspection on contaminated legs on remaining low risk structures in 2024-2028 regulatory period (489 structures).
4. Removal of contaminated legs on remaining low risk structures in 2029-2032 regulatory period (489 structures).

Total capital cost is \$32.73 million ± 25% (\$2021-22). Table 6 illustrates the timing and costs of delivering Option A.

Table 6 Option A – Timing and Costs (\$m)

2024-2028 Regulatory Period	2029-2033 Regulatory Period	Total
22.23	10.50	32.73

Option B — Remediate all asbestos affected structures in medium risk and low risk prioritisation categories in 2024-2028. [[NOSA N1164](#), [OFS 1164B](#)]

The scope of this option is:

1. Removal of contaminated legs on all medium risk structures in 2024-2028 regulatory period (1072 structures).
2. Removal of contaminated legs on all low risk structures in 2024-2028 regulatory period (532 structures).

Transgrid has a duty of care to inspect, register, monitor and control asbestos on transmission line assets in Transgrid’s electricity network under Work Health and Safety Act. This Need will permanently eliminate the safety risk from managing and controlling asbestos that Transgrid’s workforce and the public are exposed to for the remaining life of the transmission line structures. This is aligned with Section 6.2.1 Consideration of SFAIRP and ALARP Principles of [Industry Practice application note Asset Replacement Planning](#), which states “if it is not grossly disproportionately uneconomic to do so, then the source of the risk should be eliminated”.

Option B addresses “relevant matters”³ in Section 18 of the Work Health and Safety Act, specifically to these factors:

- The degree of harm that might result from the hazard or the risk.
- The availability and suitability of ways to eliminate or minimise the risk.

Consequently, elimination of asbestos on medium and low risk structure is desirable given public accessibility and the potential exposure to workers.

Option B will remediate all asbestos affected structures in medium risk and low risk prioritisation categories in 2024-2028 Regulatory Period.

Total capital cost is \$33.57 million ± 25% (\$2021-22).

3.3. Options considered and not progressed

An alternate option is to restrict access to general public by installing a fence round the towers instead of removing the paint. This option is not feasible as this doesn’t eliminate the risk to Transgrid staff, and creates additional safety risk to members of the public. As a result, there are no other technically feasible options considered.

4. Evaluation

4.1. Commercial evaluation methodology

The economic assessment undertaken for this project includes three scenarios that reflect:

³ “Relevant matters” is explained in Section 2.2 What each of the ‘relevant matters’ in Section 18 mean of [How To Determine What Is Reasonably Practicable to Meet A Health And Safety Duty](#).

- A central set of assumptions based on current information that is most likely to eventuate (central scenario);
- A set of assumptions that give rise to a lower bound for net benefits (lower bound scenario); and
- A set of assumptions that give rise to an upper bound on benefits (higher bound scenario).

Assumptions for each scenario are set out in the table below.

Table 7 Scenario Parameters

Parameter	Central scenario	Lower bound scenario	Higher bound scenario
Discount rate	5.5%	7.5%	2.3%
Capital cost	100%	125%	75%
Risk costs	100%	75%	125%
Scenario weighting	50%	25%	25%

Parameters used in this commercial evaluation:

Table 8 Key Parameters

Parameter	Parameter Description	Value used for this evaluation
Discount year	Year that dollar values are discounted to	2021/22
Base year	The year that dollar value outputs are expressed in real terms	2021/22 dollars
Period of analysis	Number of years included in economic analysis with remaining capital value included as terminal value at the end of the analysis period.	8 years ⁴
ALARP disproportionality	Multiplier of the environmental and safety related risk cost included in NPV analysis to demonstrate implementation of obligation to reduce to ALARP.	Refer to section 4.3 for details.

The capex figures in this OER do not include any real cost escalation.

4.2. Commercial evaluation results

The commercial evaluation of the technically feasible options is set out in Table 107. Details appear in Table 9.

Table 9 - Commercial evaluation (PV, \$ million)

Option	Capital Cost PV	Central scenario NPV	Lower bound scenario NPV	Higher bound scenario NPV	Weighted NPV	Ranking
Option A	25.77	109.85	56.39	202.35	119.61 ⁵	2
Option B	27.09	118.10	60.83	216.82	128.46 ⁵	1

⁴ 8 years is taken as the average of manufacturer minimum (5 years) and maximum (10 years) years of warranty for paint on structures.

⁵ Figures may not add due to rounding.

4.3. ALARP evaluation

Transgrid manages and mitigates bushfire and safety risks to ensure they are below risk tolerance levels or ‘As Low As Reasonably Practicable’ (‘ALARP’), per the regulatory obligations and Transgrid’s business risk appetite. Under the Electricity Supply (Safety and Network Management) Regulation 2014 Section 5 ‘A network operator must take all reasonable steps to ensure the design, construction, commissioning, operation and decommissioning of its network (or any part of its network) are safe.’ Transgrid maintains an Electricity Network Safety Management System (ENSMS) to meet this obligation.⁶

In its Network Risk Assessment Methodology, under the ALARP test with the application of a gross disproportionate factor⁷, the weighted benefits are expected to exceed the cost. Transgrid’s analysis concludes that the costs are less than the weighted benefits from mitigating bushfire and safety risks. The proposed investment will enable Transgrid to continue managing and operating this part of the network to a safety and risk mitigation level of ALARP.

Evaluation of the above options has been completed in accordance with As Low As Reasonably Practicable (ALARP) obligations. The Network Safety Risk Reduction is calculated as 1 x Bushfire Risk Reduction + 6 x Safety Risk Reduction + 0.1 x Reliability Risk Reduction.

Results of the ALARP evaluation are set out in Table 10.

Table 10 - Reasonably practicable test (\$ million)

Option	Network Safety Risk Reduction	Annualised Capex	Reasonably Practicable? ⁸
A	21.5	5.17	Yes
B	21.5	5.30	Yes

The result of the ALARP evaluation is that both Options A and B satisfies ALARP.

4.4. Preferred option

The preferred option is Option B, as it has the highest weighted NPV result of all the technically and commercially feasible options considered as part of this need. Additionally, Option B meets the ALARP threshold.

Capital and Operating Expenditure

The required capital expenditure is \$33.57 million (\$2021-22).

Regulatory Investment Test

The program and estimate allow for the appropriate regulatory approvals as required.

⁶ Transgrid’s ENSMS follows the International Organization for Standardization’s ISO31007 risk management framework which requires following hierarchy of hazard mitigation approach

⁷ In accordance with the framework for applying the ALARP principle, a disproportionality factor of 6 has been applied to risk cost figures. The values of the disproportionality factors were determined through a review of practises and legal interpretations across multiple industries, with particular reference to the works of the UK Health and Safety Executive. The methodology used to determine the disproportionality factors in this document is in line with the principles and examples presented in the AER Replacement Planning Guidelines and is consistent with Transgrid’s Revised Revenue Proposal 2023/24- 2027/28.

⁸ Reasonably practicable is defined as whether the annualised CAPEX is less than the Network Safety Risk Reduction.

5. Optimal Timing

As per the remediation priority matrix, the required by date to address the medium and low priority asbestos ranges from 2023 to 2025. This project is expected to be completed in the 2024-2028 regulatory period.

6. Recommendation

Transgrid has a duty of care to inspect, register, monitor and control asbestos on transmission line assets in Transgrid's electricity network under Work Health and Safety rules. This Need will permanently eliminate the safety risk from managing and controlling asbestos that Transgrid's workforce and the public are exposed to for the remaining life of the transmission line structures. This is aligned with Section 6.2.1 Consideration of SFAIRP and ALARP Principles of [Industry Practice application note Asset Replacement Planning](#), which states "if it is not grossly disproportionately uneconomic to do so, then the source of the risk should be eliminated".

Option B addresses "relevant matters"⁹ in Section 18 of the Work Health and Safety Act, specifically to these factors:

- The degree of harm that might result from the hazard or the risk.
- The availability and suitability of ways to eliminate or minimise the risk.
- Consequently, elimination of asbestos on medium and low risk structure is desirable given public accessibility and the potential exposure to workers.

Option B - Remediate all asbestos affected structures in medium risk and low risk prioritisation categories in 2023-2028 Regulatory Period, is selected as the following are satisfied:

- highest weighted NPV result of all the technically and commercially feasible options considered as part of this need
- Worker safety and public safety risk is managed to ALARP as required to satisfy work health safety and network safety regulatory obligations.
- Demonstrates due diligence and duty of care in ensuring the safety of Transgrid's workforce is protected.

It is recommended that Option B be scoped in detail, so that it can progress from DG1 to DG2. The total project cost is \$33.57 million (\$2021-22), including \$100,000 to progress the project from DG1 to DG2.

⁹ "Relevant matters" is explained in Section 2.2 What each of the 'relevant matters' in Section 18 mean of [How To Determine What Is Reasonably Practicable to Meet A Health And Safety Duty](#).

Appendix A Option Summary A

Project Description		Transmission Line Asbestos Paint	
Option Description		Option A - Remediate all asbestos affected structures which fall under the Medium prioritisation category, and structures that fall on the border of Medium and Low prioritisation category. Inspect all remaining structures identified as Low.	
Project Summary			
Option Rank	2	Investment Assessment Period	8
Asset Life	8	NPV Year	2022
Economic Evaluation			
NPV @ Central Benefit Scenario (PV, \$m)	109.85	Annualised CAPEX (\$m)	5.17
NPV @ Lower Bound Scenario (PV, \$m)	56.39	Network Safety Risk Reduction (\$m)	21.5
NPV @ Higher Bound Scenario (PV, \$m)	202.35	ALARP	No
NPV Weighted (PV, \$m)	119.61	Optimal Timing	2024
Cost			
Direct Capex (\$m)	29.03	Network and Corporate Overheads (\$m)	3.7
Total Capex (\$m)	32.73	Cost Capex (PV,\$m)	25.77
Terminal Value (\$m)	0.00	Terminal Value (PV,\$m)	0.00
Risk (central scenario)	Pre	Post	Benefit
Reliability (PV,\$m)	0.00	0.00	0.00
Financial (PV,\$m)	8.88	4.08	4.80
Operational/Compliance (PV,\$m)	0.00	0.00	0.00
Safety (PV,\$m)	242.07	111.25	130.82
Environmental (PV,\$m)	0.00	0.00	0.00
Reputational (\$m)	0.00	0.00	0.00
Total Risk Benefit (PV,\$m)	250.95	115.33	135.62
OPEX Benefit (PV,\$m)			0.00
Other benefit (PV,\$m)			0.00
Total Benefit (PV,\$m)			135.62

Appendix B Option Summary B

Project Description		Transmission Line Asbestos Paint	
Option Description		Option B - Remediate all asbestos affected structures which fall under the Medium and Low prioritisation category.	
Project Summary			
Option Rank	1	Investment Assessment Period	8
Asset Life	8	NPV Year	2022
Economic Evaluation			
NPV @ Central Benefit Scenario (PV, \$m)	118.10	Annualised CAPEX (\$m)	5.30
NPV @ Lower Bound Scenario (PV, \$m)	60.83	Network Safety Risk Reduction (\$m)	21.5
NPV @ Higher Bound Scenario (PV, \$m)	216.82	ALARP	Yes
NPV Weighted (PV, \$m)	128.46	Optimal Timing	2025
Cost			
Direct Capex (\$m)	29.88	Network and Corporate Overheads (\$m)	3.69
Total Capex (\$m)	33.57	Cost Capex (PV,\$m)	27.09
Terminal Value (\$m)	0.00	Terminal Value (PV,\$m)	0.00
Risk (central scenario)	Pre	Post	Benefit
Reliability (PV,\$m)	0.00	0.00	0.00
Financial (PV,\$m)	8.88	3.74	5.14
Operational/Compliance (PV,\$m)	0.00	0.00	0.00
Safety (PV,\$m)	242.07	102.02	140.05
Environmental (PV,\$m)	0.00	0.00	0.00
Reputational (\$m)	0.00	0.00	0.00
Total Risk Benefit (PV,\$m)	250.95	105.76	145.19
OPEX Benefit (PV,\$m)			0.00
Other benefit (PV,\$m)			0.00
Total Benefit (PV,\$m)			145.19

Appendix C Lines in Scope

Line	Medium	Low	Grand Total
1	5		5
2	63		63
3	21		21
4	1		1
5	4		4
6	8	2	10
8	15	21	36
9	18	2	20
10	6		6
11	2		2
12		1	1
13	3		3
14	13	1	14
16	5	15	20
17	4		4
18	1		1
20	2		2
21	3		3
22	5		5
24	10		10
25	2		2
26	2		2
27	9	17	26
28	13	10	23
29	1		1
30	7	12	19
32	1		1
34	4		4
37	10	2	12
38	2		2
39	10	1	11
51	22		22
60	1		1
61	2		2

Line	Medium	Low	Grand Total
62	144	83	227
63	26		26
64		1	1
66	5		5
70	2	1	3
71	2	1	3
72	76	103	179
76	7		7
77	3		3
78	4		4
79	14		14
81	5	11	16
82	11		11
83	2		2
84	1		1
87	55	39	94
88	49	6	55
89	73	75	148
92		1	1
93	5		5
94		1	1
959	27	2	29
995	1		1
999	6		6
0X1	5		5
10/16	1		1
12/76	32		32
13/14		7	7
13/78	29		29
1C/1F	2	12	14
2/9	1		1
25/26	14	1	15
25/92	17	16	33
25/93	3		3
250/27	5	2	7
26/29	2		2

Line	Medium	Low	Grand Total
26/92	1	1	2
31/32	4	1	5
33/34	1	1	2
3J	3		3
3W	2	1	3
70/71	12	2	14
72/949	22	10	32
76/77	50	32	82
76/78	34		34
82/95	1	1	2
85/8E	1		1
86/968	4	7	11
90/92	1	7	8
92/93	7	14	21
94/96	11	8	19
96/9W	1		1
97K/97L	2		2
99W	2		2
99X	3		3
M11	5		5
U1		1	1
X5/1	1		1
Grand Total	1072	532	1604