

Appendix A

**Secretary's Environmental Assessment
Requirements cross-reference**

Table A.1 Secretary’s environmental assessment requirements cross-reference

Requirement	Item	Where addressed in EIS
General Requirements	The Environmental Impact Statement (EIS) for the project must comply with the requirements in Schedule 2 of the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation). In particular, the EIS must include:	A checklist is provided in Appendix B
	> a stand-alone executive summary;	Executive Summary
	> a summary of the background to the project, including alternatives that were considered to the project;	Chapter 2 (Strategic context and need) and Chapter 3 (Proposal design development)
	> a full description of the project, accompanied by suitable maps and plans, including the: <ul style="list-style-type: none"> - disturbance area; - physical layout of the project over time, including sections of key components; - key uses and activities to be carried out on site; - likely timing of the project including any stages, the key phases within each stage (site preparation, construction, commissioning, operation, decommissioning and rehabilitation) and the sequencing of these stages and phases; 	Chapter 5 (Proposal intrastate and operation) and Chapter 6 (Proposal construction)
	> the relevant strategic context for the project, having regard to: <ul style="list-style-type: none"> - State legislation, policies and guidelines including current initiatives to improve energy security and reliability in the National Electricity Market; - any other existing, approved or proposed projects that could result in cumulative impacts with the project; 	Chapter 2 (Strategic context and need) and Chapter 22 (Cumulative impacts)

Requirement	Item	Where addressed in EIS
	<ul style="list-style-type: none"> > the relevant statutory context for the project, including: <ul style="list-style-type: none"> - the assessment pathway for the project under the <i>Environmental Planning and Assessment Act 1979</i>; - the approvals required before the project may be carried out; - any relevant matters for consideration; 	Section 1.4 and Appendix C.
	<ul style="list-style-type: none"> > a description of the engagement that was carried out during the preparation of the EIS, the key issues raised during this engagement and the proposed engagement strategy for the project if it is approved; 	Chapter 7 (Stakeholder and community consultation)
	<ul style="list-style-type: none"> > an assessment of the likely economic, social and environmental impacts of the project having regard to the requirements in any relevant Government legislation, policies and guidelines (see below), including: <ul style="list-style-type: none"> - the state of the existing environment; - community views; - the measures that would be implemented to avoid or minimise impacts, including a consolidated summary of the proposed mitigation measures for the project; - the predicted impacts of the project, including any cumulative impacts; - actions proposed to deal with any uncertainties associated with the assessment 	Chapters 9 to 22
	<ul style="list-style-type: none"> > a detailed evaluation of the merits of the project as a whole 	Chapter 24 (Justification and conclusion)
	<p>In addition to the matters set out in Schedule 1 of the EP&A Regulation, the EIS must be accompanied by a signed report from a suitably qualified person that includes an accurate estimate of the capital investment value of the project (as defined in Clause 3 of the EP&A Regulation).</p>	Appendix E

Requirement	Item	Where addressed in EIS
Key issues		
Biodiversity	> an assessment of the biodiversity impacts of the project in accordance with the <i>NSW Biodiversity Conservation Act 2016</i> , the Biodiversity Assessment Method (BAM) and documented in a Biodiversity Development Assessment Report (BDAR).	Chapter 9 (Biodiversity) and Technical paper 1
	> the BDAR must document the application of the avoid, minimise and offset framework including assessing all direct, indirect and prescribed impacts in accordance with the BAM.	Chapter 9 (Biodiversity) and Technical paper 1
	> an assessment of the impacts of the project on aquatic ecology including impacts on key fish habitat and threatened species of fish	Chapter 9 (Biodiversity) and Technical paper 1
Heritage	> an assessment of the Aboriginal and historic heritage (cultural and archaeological) impacts of the project	Chapter 10 (Aboriginal heritage), Chapter 11 (Non-Aboriginal heritage) and Technical paper 2
	> adequate consultation with the local Aboriginal community and other relevant stakeholders, having regard to the Aboriginal Cultural Heritage Consultation Requirements for Proponents (OEH, 2010)	Chapter 10 (Aboriginal heritage) and Technical paper 2
Water quality	> an assessment of the impacts of the project on the quantity and quality of the region's surface water resources, including the Murray River, the Darling, Great Darling Anabranch and Lake Victoria, having regard to NSW Water Quality Objectives	Chapter 15 (Hydrology, flooding and water quality) and Technical paper 6
	> details of water requirements, supply arrangements and wastewater disposal arrangements for construction and operation;	Chapter 15 (Hydrology, flooding and water quality), Chapter 20 (Soils, contamination and groundwater), Technical paper 6 and Technical paper 13

Requirement	Item	Where addressed in EIS
	> an assessment of the impacts of the project on groundwater aquifers and groundwater dependent ecosystems having regard to the NSW Aquifer Interference Policy and relevant Water Sharing Plans	Chapter 20 (Soils, contamination and groundwater) and Technical paper 13
	> an assessment of the potential flooding impacts and risks of the project	Chapter 15 (Hydrology, flooding and water quality) and Technical paper 6
Land	> an assessment of impacts of the project on soils and land capability of the site and surrounds	Chapter 12 (Land use and property), Chapter 20 (Soils, contamination and groundwater) and Technical paper 3
	> an assessment of the risk of soil contamination and disturbance of land associated with naturally occurring asbestos in the vicinity of the site	Chapter 20 (Soils, contamination and groundwater) and Technical paper 12
	> assessment of impact of the project on any Crown lands and travelling stock reserves	Chapter 12 (Land use and property) and Technical paper 3
Transport	> an assessment of the transport impacts of the project on the capacity, condition, safety and efficiency of the local and State road network	Chapter 18 (Traffic and transport) and Technical paper 9
	> details of the ongoing maintenance works required to service assets, outlining the measures to maintain the road network	Chapter 18 (Traffic and transport) and Technical paper 9
Amenity	> an assessment of the likely visual impacts of the development on surrounding residences, scenic or significant vistas, night lighting, air traffic and road corridors in the public domain	Chapter 13 (Landscape character and visual amenity) and Technical paper 4
	> an assessment of the construction, operational and road noise and vibration impacts of the project	Chapter 17 (Noise and vibration) and Technical paper 8
Air	> an assessment of the air quality impacts of the project	Chapter 16 (Air quality) and Technical paper 7

Requirement	Item	Where addressed in EIS
Hazards	<ul style="list-style-type: none"> > an assessment of potential hazards and risks associated with electric and magnetic fields (EMF) having regard to the latest advice of the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) 	Chapter 19 (Hazards and risk) and Technical paper 11
	<ul style="list-style-type: none"> > an assessment of the risks to public safety, paying particular attention to bushfire risks, emergency egress and evacuation, and the handling and use of any dangerous goods 	Chapter 19 (Hazards and risk) and Technical paper 10
Waste	<ul style="list-style-type: none"> > identify, quantify and classify the likely waste streams to be generated during construction and operation, and describe the measures to be implemented to manage, reuse, recycle and safely dispose of this waste 	Chapter 21 (Waste management and resource use)
Social and Economic	<ul style="list-style-type: none"> > including an assessment of the social and economic impacts and benefits of the project (including the workers accommodation facility) for the region and the State as a whole, including consideration of any increase in demand for community infrastructure and services 	Chapter 14 (Social and economic) and Technical paper 5
Consultation	<ul style="list-style-type: none"> > during the preparation of the EIS, you should consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups, affected landowners, Native Title holders, exploration licence holders, quarry operators and mineral title holders. 	Chapter 7 (Stakeholder and community consultation) and Appendix D – Consultation outcomes report
	<ul style="list-style-type: none"> > if you do not lodge the EIS for the project within 2 years of the issue date of these requirements, you must seek revised requirements for the EIS for the project 	The requirements were issued on 30 July 2020. The 2 year period has not expired.

Appendix A of the Secretary’s environmental assessment requirements cross-reference

Guidelines for preparing assessment documentation relevant to the *Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)* for proposals being assessed under the *NSW Assessment Bilateral*.

Project EnergyConnect (NSW – Western Section) (EPBC 2020/8673)

Table A.2 details the response to requirements detailed in Appendix A of the SEARs, which commences from Paragraph 5 onwards. Paragraphs 1 to 4 outlines an introduction to the controlled action.

Table A.2 Appendix A of the Secretary’s environmental assessment requirements cross-reference

Requirement	Paragraph	Where addressed in EIS
Relevant regulations	5. The Environmental Impact Statement (EIS) must address all matters outlined in Schedule 4 of the <i>Environment Protection and Biodiversity Conservation Regulations 2000 (Cth)</i> and all matters outlined below in relation to the controlling provisions.	<p>The below provides a checklist against the matters outlined in Appendix A of the SEARs.</p> <p>Appendix A of the SEARs duplicates, in part, some provisions of Schedule 4 of the <i>Environment Protection and Biodiversity Conservation Regulations 2000 (Cth)</i> (the EPBC Regulations). This checklist identifies the provisions of that Regulation not covered by the matters specifically identified in Appendix A of the SEARs.</p>
Project description (Clause 1 and Clause 2 of Schedule 4 of the EPBC Regulations)	6. The title of the action, background to the action and current status <u>Additional provisions of Schedule 4 of the EPBC Regulations</u> <ul style="list-style-type: none"> > Clause 1, Schedule 4 of the EPBC Regulations also requires the following: > the full name and postal address of the designated proponent > a clear outline of the objective of the action > the consequences of not proceeding with the action. 	<p>The title of the action (being EnergyConnect (NSW – Western Section)) and details of the proponent are available in the Certification page of the EIS.</p> <p>This EIS seeks approval for the action.</p> <p>The objectives of the proposal are outlined in Section 1.2.2 of the EIS.</p> <p>The consequences of not proceeding with the proposal is outlined in Section 2.6 of the EIS.</p>
	7. the precise location and description of all works to be undertaken (including associated offsite works and infrastructure), structures to be built or elements of the action that may have impacts on MNES	<p>A description of the proposal is provided in Chapter 5 and Chapter 6 of the EIS. The assessment considers an indicative disturbance area as described in Chapter 8 of the EIS.</p> <p>Further description is provided in sections 1.6, 7, 9.9 and Appendix E of Technical paper 1.</p>

Requirement	Paragraph	Where addressed in EIS
	<p>8. how the action relates to any other actions that have been, or are being taken in the region affected by the action</p>	<p>The proposal is part of EnergyConnect, which would be constructed in progressive sections. A description of the South Australian Section, the Victorian Section and the NSW – Eastern Section is provided in Chapter 1 of the EIS. The South Australian Section (referral reference no 2019/6468) and the NSW – Eastern Section (referral reference no 2020/8766) were determined to be separate controlled actions.</p> <p>This action (being the proposal) is a standalone action which would have distinct potential impacts that would not change due to development of any subsequent sections of EnergyConnect. Further:</p> <ul style="list-style-type: none"> > EnergyConnect has been divided by its different jurisdictions, except in NSW. The proposal is able to operate independently of the NSW – Eastern Section, and subsequent sections of EnergyConnect would be geographically distinct to the proposal (the action) > the other components of EnergyConnect would be subject to separate assessments and approvals once the details of the other sections are more developed. Assessing both sections of EnergyConnect in NSW or any other sections as a combined project would not change the assessment on relevant Matters of National Environmental Significance (MNES) compared to assessing as separate projects. Relevant MNES for subsequent sections of EnergyConnect are expected to be different and not of a cumulative nature to the MNES relevant to the currently proposed action.

Requirement	Paragraph	Where addressed in EIS
	<p>9. How the works are to be undertaken and design parameters for those aspects of the structures or elements of the action that may have relevant impacts on MNES</p>	<p>A description of the proposal is provided in Chapter 5 and Chapter 6 of the EIS. The assessment considers an indicative disturbance area as described in Chapter 8 of the EIS.</p> <p>Further description is provided in Sections 1.6, 7, 9.9 and Appendix E of Technical paper 1.</p>
<p>Impacts <i>(Clause 3 of Schedule 4 of the EPBC Regulations)</i></p>	<p>10. The EIS must include an assessment of the relevant impacts of the action on the matters protected by the controlling provisions, including:</p> <ul style="list-style-type: none"> > a description and detailed assessment of the nature and extent of the likely direct, indirect and consequential impacts, including short term and long term relevant impacts > a statement whether any relevant impacts are likely to be unknown, unpredictable or irreversible > analysis of the significance of the relevant impacts > any technical data and other information used or needed to make a detailed assessment of the relevant impacts. <p>For this requirement, Appendix A defines relevant impacts as those impacts likely to significantly impact on any matter protected under the EPBC Act.</p>	<p>The BDAR concludes that based on full and comprehensive seasonal targeted survey data, that no MNES are likely to be significantly impacted, so this factor does not strictly apply.</p> <p>However, for consideration, further description is provided in Sections 1.6, 7, 9, 10 and Appendix E of Technical paper 1 in relation to these factors.</p>

Requirement	Paragraph	Where addressed in EIS
<p>Avoidance, mitigation and offsetting</p> <p><i>(Clause 4 of Schedule 4 of the EPBC Regulations)</i></p>	<p>11. For <u>each</u> of the relevant matters protected that are likely to be significantly impacted by the action, the EIS must provide information on proposed avoidance and mitigation measures to manage the relevant impacts of the action including:</p> <ul style="list-style-type: none"> – a description, and an assessment of the expected or predicted effectiveness of the mitigation measures – any statutory policy basis for the mitigation measures – the cost of the mitigation measures – an outline of an environmental management plan that sets out the framework for continuing management, mitigation and monitoring programs for the relevant impacts of the action, including any provisions for independent environmental auditing – the name of the agency responsible for endorsing or approving each mitigation measure or monitoring program. 	<p>The BDAR concludes that based on full and comprehensive seasonal targeted survey data, that no MNES are likely to be significantly impacted, so this factor does not strictly apply.</p> <p>Avoidance measures are discussed in Section 8 of Technical paper 1.</p> <p>Also for consideration, further relevant description is provided in Sections 1.6, 7, 9, 10 and Appendix E of Technical paper 1 in relation to these factors.</p> <p>A consolidated list of mitigation measures is provided in Section 23.1 of the EIS. Section 11 of Technical paper 1 summarises the mitigation measures specific to the biodiversity assessment</p>
	<p><u>Additional provisions of Schedule 4 of the EPBC Regulations</u></p> <p>Clause 4, Schedule 4 of the EPBC Regulations also requires the following:</p> <ul style="list-style-type: none"> > a consolidated list of mitigation measures proposed to be undertaken to prevent, minimise or compensate for the relevant impacts of the action, including mitigation measures proposed to be taken by State governments, local governments or the proponent 	

Requirement	Paragraph	Where addressed in EIS
	<p>12. Where a significant residual adverse impact to a relevant protected matter is considered likely, the EIS must provide information on the proposed offset strategy, including discussion of the conservation benefit associated with the proposed offset strategy</p>	<p>Technical paper 1 (the BDAR) concludes that based on full and comprehensive seasonal targeted survey data, that no MNES are likely to be significantly impacted, so this factor does not strictly apply.</p> <p>Nevertheless, all impacts of the project will be offset via the application of the Biodiversity Assessment Method (BAM) for the recorded MNES. The BAM is the approved method required to be implemented under the bilateral process.</p>
	<p>13. for each of the relevant matters likely to be impacted by the action the EIS must provide reference to, and consideration of, relevant Commonwealth guidelines and policy statements including any:</p> <ul style="list-style-type: none"> – conservation advice or recovery plan for the species or community – relevant threat abatement plan for the species or community – wildlife conservation plan for the species – any strategic assessment 	<p>Refer to Section 9.9 and Appendix E of Technical paper 1.</p>
	<p>14. In addition to the general requirements described above, specific information is required with respect to each of the determined controlling provisions. These requirements are outlined in paragraphs 15-17.</p>	<p>Refer to responses to requirements 15-17 below.</p>
Biodiversity	<p>15. The EIS must identify each EPBC Act listed threatened species and community and migratory species likely to be impacted by the action. For any species and communities that are likely to be impacted, the proponent must provide a description of the nature, quantum and consequences of the impacts. For species and communities potentially located in the project area or in the vicinity that are not likely to be impacted, provide evidence why they are not likely to be impacted</p>	<p>Refer to Sections 1.6, 7, 9, 10 and Appendix E of Technical paper 1 in relation to these factors.</p>

Requirement	Paragraph	Where addressed in EIS
	<p>16. For <u>each</u> of the EPBC Act listed threatened species and communities and migratory species likely to be impacted by the action the EIS must provide a separate:</p> <ul style="list-style-type: none"> – description of the habitat (including identification and mapping of suitable breeding habitat, suitable foraging habitat, important populations and habitat critical for survival), with consideration of, and reference to, any relevant Commonwealth guidelines and policy statements including listing advice, conservation advice and recovery plan – details of the scope, timing and methodology for studies or surveys used and how they are consistent with (or justification for divergence from) published Australian Government guidelines and policy statements – description of the relevant impacts of the action having regard to the full national extent of the species or community's range – description of the specific proposed avoidance and mitigation measures to deal with relevant impacts of the action – identification of significant residual adverse impacts likely to occur after the proposed activities to avoid and mitigate all impacts are taken into account – a description of any offsets proposed to address residual adverse significant impacts and how these offsets will be established – details of how the current published NSW Biodiversity Assessment Method (BAM) has been applied in accordance with the objects of the EPBC Act to offset significant residual adverse impacts 	<p>These factors have specifically been considered in Appendix E of Technical paper 1.</p>

Requirement	Paragraph	Where addressed in EIS
	<ul style="list-style-type: none"> - details of the offset package to compensate for significant residual impacts including details of the credit profiles required to offset the action in accordance with the BAM and/or mapping and descriptions of the extent and condition of the relevant habitat and/or threatened communities occurring on proposed offset sites 	
	<p>17. Any significant residual impacts not addressed by the BAM may need to be addressed in accordance with the EPBC Act 1999 Environmental Offset Policy. http://www.environment.gov.au/epbc/publications/epbc-act-environmental-offsets-policy.</p>	<p>Technical paper 1 (the BDAR) concludes that based on full and comprehensive seasonal targeted survey data, that no MNES are likely to be significantly impacted, so this factor does not strictly apply.</p> <p>Nevertheless, all impacts of the project will be offset via the application of the Biodiversity Assessment Method (BAM) for the recorded MNES. The BAM is the approved method required to be implemented under the bilateral process.</p> <p>Any biodiversity offsets will be provided in accordance with the EPBC Act 1999 Environmental Offset Policy.</p>

Requirement	Paragraph	Where addressed in EIS
Other approvals and conditions	<p>18. Information in relation to any other approvals or conditions required must include the information prescribed in Schedule 4 Clause 5 (a) (b) (c) and (d) of the EPBC Regulations 2000.</p> <p><u>Provisions of Schedule 4 of the EPBC Regulations</u></p> <p>Clause 5, Schedule 4 of the EPBC Regulations requires the following:</p> <ul style="list-style-type: none"> > details of any local or State government planning scheme, or plan or policy under any local or State government planning system that deals with the proposed action, including: <ul style="list-style-type: none"> – what environmental assessment of the proposed action has been, or is being, carried out under the scheme, plan or policy – how the scheme provides for the prevention, minimisation and management of any relevant impacts <p><i>(clause 5.01a)</i></p>	<p>This EIS presents the environmental impact assessment to support the application for the proposal under Division 5.2, Part 5 of the EP&A Act. The status of the NSW planning approval process is summarised in Section 1.4 of the EIS. A determination from the NSW Minister for Planning and Public Spaces will be required in addition to an approval under the EPBC Act.</p> <p>Other approvals, licences or permits required under NSW legislation is summarised in Appendix C of this EIS.</p> <p>Other than the EIS, no other environmental assessment has been, or is being carried out for the project for the purpose of any local or state plan or policy.</p>
	<ul style="list-style-type: none"> > a description of any approval that has been obtained from a State, Territory or Commonwealth agency or authority (other than an approval under the Act), including any conditions that apply to the action <i>(clause 5.01b)</i> > a statement identifying any additional approval that is required <i>(clause 5.01c)</i> > a description of the monitoring, enforcement and review procedures that apply, or are proposed to apply, to the action <i>(clause 5.01d).</i> 	<p>A brief description of monitoring, enforcement and review processes is provided in Section 23.1 of the EIS. Environmental management system (EMS) of the construction contractor and TransGrid are accredited under ISO 14001:2015. The procedures during construction would be further detailed in the Construction Environmental Management Plan. Operational management of the proposal would be under TransGrid's Environmental Management System, and associated procedures.</p>

Requirement	Paragraph	Where addressed in EIS
Environmental record of person proposing to take the action	<p>19. Information in relation to the environmental record of a person proposing to take the action must include details as prescribed in Schedule 4 Clause 6 of the EPBC Regulations 2000.</p> <p><u>Provisions of Schedule 4 of the EPBC Regulations</u></p> <p>Clause 6, Schedule 4 of the EPBC Regulations requires the following:</p> <ul style="list-style-type: none"> > Details of any proceedings under a Commonwealth, State or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against: <ul style="list-style-type: none"> – the person proposing to take the action; and – for an action for which a person has applied for a permit, the person making the application <p><i>(clause 6.01a)</i></p> > If the person proposing to take the action is a corporation—details of the corporation’s environmental policy and planning framework. <p><i>(clause 6.01b)</i></p> 	Refer to the detail provided below this table.
Information sources	For information given in an EIS, the EIS must state the source of the information, how recent the information is, how the reliability of the information was tested; and what uncertainties (if any) are in the information.	<p>Technical paper 1 was prepared by suitably qualified and accredited ecologists based on comprehensive seasonal targeted field surveys and reviews of relevant publicly available desktop sources. As such, the level of reliability is high. Internal reviews by expert ecologists were undertaken to ensure the reliability of the information and no uncertainties exist.</p> <p>A table presenting the information sources and the associated required details is presented in Technical paper 1 (References section).</p>

Environmental record of person proposing to take the action

TransGrid has a consistent record of proactively seeking environmental approvals where required and ensuring that any commitments or conditions placed on activities as a result of these approval processes are adhered to.

In 2001, TransGrid was subject to proceedings under State Environmental laws for clearing vegetation in the vicinity of transmission lines. TransGrid subsequently invested \$5 million toward site rehabilitation. Since the 2001 incident, TransGrid has not been subject to any proceedings under a Commonwealth, State or Territory law for the protection of the environment or the conservation and sustainable use of natural resources.

TransGrid is committed to conducting its activities and services in a manner that minimises pollution and complies with relevant environmental legislation, industry standards and codes of practice. TransGrid implores all employees and contractors to stop and consider the potential impact to the environment from their activities.

TransGrid aim to enhance their systems and processes in a manner that promotes continuous improvement in environmental management and which will lead to the achievement of industry best practice.

In meeting these commitments, TransGrid:

- > maintains an Environmental Management System (EMS) that provides the framework for setting and reviewing our environmental objectives and targets, including the implementation, monitoring and review of these objectives and targets, as well as facilitating continuous improvement in environmental performance
- > continues to develop systems that recognise sensitive environmental and cultural sites on or near our infrastructure, and provides processes to manage and our activities with the aim of preventing environment harm or adversely impacting the environment
- > integrates environmental management considerations into the planning, design, siting, construction, maintenance, operation, decommissioning and disposal of all TransGrid assets
- > provides environmental training, assessment and authorisation under our Environmental Management System to employees and contractors to enable them to perform their duties in an environmentally sensitive manner
- > engages with the community, customers, employees, government and other stakeholders regarding potential environmental or cultural impacts associated with our plans and activities
- > pursues opportunities to maximise resource efficiencies and reduce the generation of waste through avoidance, reduction, reuse and recycling programs
- > identifies, sets and monitors realistic environmental measures and communicates them to all employees and stakeholders.

The proposal (the action) would be undertaken in accordance with TransGrid's environmental policy and planning framework TransGrid Environment Policy is available on their web site, and the construction contractor's EMS. Both EMS' are accredited under ISO 14001:2015.

TransGrid's Environmental Policy commits to protecting and enhancing the natural environmental and social values in all TransGrid's activities. TransGrid's planning framework allows for early identification of environment and social values and methods for avoiding, minimising and mitigating impacts caused as a result of their developments via preliminary detailed screening and risk assessments within the development envelope and finally subsequent footprint selection.

TransGrid's EMS is independently certified and covers all of their processes and activities that have the potential to impact on the environment. The EMS enables compliance with TransGrid's environment and heritage compliance obligations, providing the framework for driving environmental requirements throughout leadership, planning, support, operation, performance evaluation and continuous improvement actions. The proposed action, therefore, will be undertaken, monitored and measured in accordance with the TransGrid's EMS.