

19 December 2008

Board of Inquiry
Proposed NPS for Renewable Electricity Generation
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To: The Chairperson

FURTHER SUBMISSION BY GENESIS POWER LIMITED ON THE PROPOSED NATIONAL POLICY STATEMENT FOR RENEWABLE ELECTRICITY GENERATION

Genesis Power Limited ("**Genesis Energy**") lodged a submission on the Proposed NPS for Renewable Electricity Generation.

Please find **attached** Genesis Energy's further submission to the Board of Inquiry on the Proposed NPS for Renewable Electricity Generation. The further submission is divided into the following three categories:

- A selection of submissions that Genesis Energy supports with corresponding reasons for the support.
- A selection of submissions that Genesis Energy opposes with corresponding reasons for the opposition.
- A selection of submissions that Genesis Energy conditionally opposes with corresponding reasons for the conditional opposition.

I note that the reasons for our further submission apply to any other original submission which raises similar points to those we have addressed.

Genesis Energy wishes to be heard in support of these submissions.

If others make a similar submission, then Genesis Energy will be prepared to consider presenting a joint case with them during the hearing.

Yours sincerely



Andrea Marshall
Manager – Corporate Social Responsibility & Environmental Strategy

'Original' Submitter	Original Submission No	Support / Oppose	The reasons for our support and / or opposition include:	We seek the following decision
New Zealand Wind Energy Association	52	Support	<ul style="list-style-type: none"> • Genesis Energy supports the submission to expand the benefits of renewable energy generation as listed in Policy 1. • A policy protecting new and existing generation from reverse sensitivity effects is appropriate. • Policies to protect existing renewable generation facilities are supported. • It is necessary to recognise that a diversity of generation, including thermal electricity generation plays a role in supporting renewable electricity generation and maintaining security of supply. • The policy on 'reversibility' is not appropriate. 	Accept submissions.
Unison Networks Limited	54			
Contact Energy Limited	64			
Mighty River Power	73			
Meridian Energy Limited	88			
Pioneer Generation Ltd	22			
King Country Energy Ltd	23			
Rangitata Diversion Race Limited				
TrustPower	94			
Fonterra	37	Oppose	<ul style="list-style-type: none"> • It is not necessary to re-assess the NPS against other sectors which seek prioritisation for water, such as agriculture. • It is not appropriate for the NPS to provide or acknowledge that municipal water supply may have priority over renewable electricity generation. • It is not appropriate for the NPS to specify the environmental matters that the benefits of renewable energy proposals are to be weighed against. • The NPS is necessary and will add value to the decision making process. • It is not appropriate for the NPS to address all Part 2 RMA matters. • The NPS does not elevate renewable electricity generation to a status that undermines the sustainable management purpose of the Act. 	Reject submissions
Hamilton City Council	61			
Franklin District Council	65			
Federated Farmers	89			
Horizons Regional Council	105			
Waimakariri District Council	12			
Taranaki Regional Council	15			
Fish and Game	112			
Auckland Regional Council	115			
Resource Management Law Association of New Zealand	56	Conditional opposition	<ul style="list-style-type: none"> • It is not appropriate for the NPS to attempt to provide guidance on how to balance the benefits of renewable energy generation with competing values. Such an approach is inherent in the RMA. This is also likely to undermine the development and purpose of the NPS. • To the extent that the NPS should provide any guidance on prioritising resource use, it should accord priority to electricity generation. 	Reject submissions
Environment Bay of Plenty	82			
Local Government New Zealand	109			