

Further submission in support of submissions on the proposed NPS for renewable electricity generation

To: The Chairperson
Board of Inquiry

Name of Person making further submission:

NZ Windfarms Ltd

Level 5, 315 Manchester Street, Christchurch.

Further Submission: This is a further submission in support of the following submissions on the proposed national policy statement for renewable electricity generation.

Support: The particular parts of these submissions that are supported are set out in the following table.

Parts of Submission Supported	Submitter and (Submission No)
Objective: Amend objective as submitted by Hawkes Bay Regional Council.	Hawkes Bay Regional Council (110)
Policy 1: Provide additional benefits.	WEL Networks Ltd (4) Rodney District Council (7) Pioneer Generation Ltd (22) Northpower Ltd (26) Genesis Energy (33) Wellington City Council (36) Windflow Technology Ltd (42) NZ Wind Energy Association (52) Unison Networks Ltd (54) Meridian Energy Ltd (88) Trustpower (94) Local Government NZ (109)
Policy 1 Guidance: Provide more guidance on balancing s 7(j) renewable energy benefits against other Part II matters and the provision of other guidance.	Kapiti Coast District Council (11) Kensington Swan (25) Genesis Energy (33) Wellington City Council (36) Waitakere City Council (69) Christchurch City Council (108) Local Government NZ (109) Transpower NZ Ltd (111)

<p>Policy 2: Clarity / guidance needed around Policy 2</p>	<p>Mainpower (19) Northpower Ltd (26) Waikato District Council (28)</p>
<p>Policy 3: Definition /guidance on <i>relative degree of reversibility</i>.</p>	<p>Kensington Swan (25) Waikato District Council (28) Wellington City Council (36) Unison Networks Ltd (54) Marlborough District Council (72) Whangarei District Council (99)</p>
<p>Policy 5 & Interpretation of small and community scale distributed renewable energy generation: Increase threshold to 10 megawatts</p>	<p>Mainpower (19) King Country Energy Ltd (23) RDR Management Ltd (35) Windflow Technology (42) NZ Wind Energy Association (52) Unison Networks Ltd (54) Trustpower (94)</p>
<p>Additional Policies or inclusion in appropriate policy area:</p> <p>Policy 6: To address reverse sensitivity issues in relation to existing and consented renewable electricity generation activities.</p> <p>Policy 7: To monitor NPS implementation and provide for review</p>	<p>Genesis Energy (33) Unison Networks Ltd (54) Contact Energy Ltd (64) Meridian Energy Ltd (88)</p> <p>IPENZ (92) Manukau City Council (97)</p>

Reasons for Support: The reasons for NZ Windfarms support and the parts we seek to be allowed are:

<p>Objective: Hawkes Bay Regional Council (110) Para 3.5.</p> <p>Reasons: The objective should be outcome-focused. The recommended wording, as submitted by HBRC, would provide more clarity.</p> <p>Part sought to be allowed: Re-order the wording of the objective to read, <i>"Promotion of development, upgrading, maintenance, and operation of new and existing renewable electricity generation activities as a matter of national significance so as to ensure that 90 per cent of New Zealand's electricity will be generated from renewable sources by 2025 (based on delivered electricity in an average hydrological year)."</i></p>
<p>Policy 1: Provide additional benefits in Policy 1 as submitted by a range of submitters listed in the above table.</p> <p>Reasons: While it is noted that Policy 1 qualifies the limited benefits provided by, <i>"These benefits may include, but are not limited to:"</i> the Environment Court, resource consent applications and NPS submitters (including local authorities) have identified a wider range of benefits associated with renewable energy projects. It would help guide consenting authorities if these benefits were provided as part of Policy 1 or be referenced to Policy 1.</p> <p>Part sought to be allowed: The benefits listed by the submitters listed in the foregoing table and as articulated by the Environment Court should be referenced to Policy 1 – examples of benefits are given in submissions, such as Genesis Energy (33) Appendix 1 A, Para 8(a) and (b), Wellington City Council (36) Para 4, NZ Wind Energy Association (52) Para 3.13.</p>
<p>Policy 1 Guidance: Provide more guidance on balancing s 7(j) renewable energy benefits against other matters.</p> <p>Reasons: It is clear from the submissions made by a number of local authorities that there is a need to for guidance and clarity on balancing s 7(j) renewable energy benefits against other Part II matters. Such guidance will promote consistent decision-making.</p> <p>Part sought to be allowed: As per submissions made on Policy 1 guidance – submitter as listed in the above table.</p>
<p>Policy 2: Clarity / Guidance needed around Policy 2.</p> <p>Reasons: While it is understood that under Policy 2 consent authorities must have particular regard to constraints associated with renewable energy activities the intent needs to be made clearer either by amending the present wording of Policy 2 or by providing guidance on how to assess these constraints.</p> <p>Part sought to be allowed: Amend the present wording as submitted by Mainpower (19) p.3 and/or provide guidance on how to assess the constraints set out under Policy 2 as submitted by Waikato District Council (28).</p>
<p>Policy 5 & Interpretation of small and community scale distributed renewable energy generation: Increase threshold to 10 megawatts.</p> <p>Reasons: The definition of small and community-scale distributed renewable electricity generation projects having an installed electricity generation capacity should be changed from less than four to ten</p>

megawatts to be consistent with related legislation, such as the Electricity Industry Reform Act

Part sought to be allowed:

As submitted by Trustpower (94) Para 2.6.2, change the definition of “small and community scale distributed electricity generation to read:

“Small and community-scale distributed renewable energy generation” means renewable electricity generation projects with an installed electricity generation capacity of ten megawatts or less.

Additional Policy 6. or inclusion in appropriate policy area:

To address reverse sensitivity issues in relation to existing and consented renewable electricity generation activities.

Reasons: The progression of the identification of future renewable electricity generation site through to consenting and then development may take several years and land use developments over this gestation period can compromise the ability of the consent holder to operate the scheme to its maximum ability or worst case impact on the consenting and development of the scheme.

Part sought to be allowed:

As submitted by Meridian Energy Ltd (88) Para 134 provide a new Policy that reads:

“In achieving the purpose of the Act, in the preparation of policy statements and plan and in considering whether or not to grant consent to applications, decision-makers must to the extent reasonably possible, ensure that the operation, maintenance, upgrading and development of renewable energy activities are not compromised by:

- i managing activities to avoid reverse sensitivity effects on renewable electricity generation activities.*
- ii identifying appropriate buffers within which it can be expected that activities that could compromise lawfully established renewable electricity generation activities will not generally be provided for.”*

Additional Policy 7. or inclusion in appropriate policy area:

To monitor NPS implementation and provide for review

Reasons:

A 10 year NPS review process together with a process to monitor implementation and effectiveness of the NPS to help ensure the future-proofing of the NPS and its consistent application.

Part sought to be allowed:

Amend as submitted by IPENZ (92)

Hearing: NZ Windfarms wish to be heard in support of our submission and if others make a similar submission we will consider presenting a joint case with them at the hearing.

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