

**Further submission in support of, or in opposition to,  
submission on the publicly notified proposed national policy  
statement for renewable electricity generation**

**To** the Chairperson  
Board of Inquiry

Name of person making further submission:

*[full name and address]*

Alan Jenkins  
Electricity Networks Association  
154 Featherston St  
WELLINGTON 6011

This is a further submission in support of, or in opposition to, a submission on the proposed national policy statement for renewable electricity generation (the proposal).

I support the submission of:

*[name and address of original submitter and submission number of original submission]*

WEL Networks Ltd (Hamilton, No.4);  
MainPower Ltd (Rangiora, No. 19);  
Northpower Ltd (Whangarei, No. 26);  
Unison Networks Ltd (Hastings, No. 54);  
Eastland Networks Ltd (Gisborne, no. 74);  
Vector Ltd (Auckland, No. 75);  
Counties Power Ltd (Pukekohe, no. 78);  
Powerco Ltd (New Plymouth, No. 100).

The particular parts of the submissions I support are:

The support given by these electricity distributors to the recognition of the national benefits of renewable generation activities.

The reasons for my support are:

*[give reasons]*

Our Association represents all large electricity distributors, and there is widespread interest among our members in renewable generation ventures. The proposed NPS in general would assist them in promoting such ventures.

I seek that the submission be allowed, subject to the following changes to the 'Interpretation' section following Policy 5:

[give precise details]

- *We recommend that the definition of “small and community-scale distributed renewable electricity generation” should be larger than 4 MW. We note that several submitters (e.g. Unison and Windflow Technologies have suggested 10 MW, which would be consistent with the definition provided in the Electricity industry reform Act 1998). We also recommend that the NPS provide for the scale limitation to be able to be increased for projects at the Minister’s discretion. We point out that total generation capacity in New Zealand is approaching 9,000 MW, meaning that a project of even 100 MW (about 1% of total capacity) would be a very small increment to the total. The rapid changes facing the energy sector, including the very likely emergence of considerable rises in local electricity loads caused by electric vehicles, mean that communities will need cost-effective options for supplying electricity that do not necessitate unreasonable environmental compromises. Restricting the capacity of small-scale projects to no greater than 4MW could mean that less efficient options are adopted, that there is a wasteful bias towards proliferation when some centralisation would be more efficient, and so forth.*
- *We further recommend that the definition of “small and community-scale distributed renewable electricity generation” should not exclude “offshore wind, tidal and wave generation”. There does not appear to be any reasonable justification for ruling such options out of the definition.*
- *The definition of National grid should be extended as follows – “National grid means the assets used or owned by Transpower NZ Limited or comparable assets owned by electricity distributors.” There is no reason why Transpower should be considered to have a sole franchise for the conveyance of high voltage electricity. We note that the definition of “Local electricity distribution network” on page 3 doesn’t seem to grant ELBs the same exclusivity. Defining an asset just on the basis of ownership rather than on the basis of its function or physical characteristics creates unnecessary rigidities and – in this case – also tends to suppress potential competition (e.g. where a distributor might seek to build a high voltage line because it believes it could do this more effectively than Transpower might.*

I do not wish to be heard in support of my submission.

Alan Jenkins

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Signature of submitter (or person authorised to sign on behalf of submitter)

**17 December 2008**

(A signature is not required if you make your submission by electronic means.)

Address for service of submitter:	ENA PO Box 1017 Wellington 6140
Telephone:	04 471 1335
Fax/email:	adj@electricity.org.nz
Contact person: <i>[name and designation, if applicable]</i>	Alan Jenkins Chief Executive