
From: John & Sue Douglas [mailto:jdouglas.alx@xtra.co.nz]
Sent: Friday, 31 October 2008 8:48 a.m.
To: Melissa Keys
Subject: submission-Renewable Electricity Generation

Form 3
**Submission on proposal for national policy statement for
renewable electricity generation**

In accordance with section 49 of the Resource Management Act 1991

To the Chairperson
Board of Inquiry

c/o PO Box 10362 WELLINGTON 6143

This is a submission on the (following) proposed national policy statement for renewable electricity generation (the proposal) that was publicly notified on 6 September 2008.

The specific provisions of the proposal that my submission relates to are:

[give details]

- 1) Risks of climate change are mainly contributed to natural causes and the extent greenhouse gas emissions does to climate changes is just one cause of many.
- 2) Yes we do need to deliver clean secure avoidable energy with a reliable base load while still treating the environment in a responsible manner.
- 3) Natural resources from which electricity is generated from most take into account areas of significant natural character, significant amenity values, historic heritage / historic corridors, outstanding / significant natural features and landscapes, avoidance of man made structures from the skyline from the public view, significant indigenous vegetation (flora) and significant habitats of indigenous fauna.
- 4) Amend to “**Renewable electricity generation**” means generation of electricity from solar, wind, hydro, geothermal, biomass, tidal, wave, or ocean currents resources and to have an open mind at all times to the prospect of forms of nuclear energy.

Nuclear energy provides a large reliable base load, footprint small in

comparison to generation produced, built where the demand is required and produces no greenhouse emissions.

My submission is:

[include –

1. • *whether you support or oppose the specific provisions or wish to have them amended; and*
2. • *the reasons for your views*].
- 3.

1) Target setting does not work and may not be cost-effective, if only the last steps towards the final target (e.g. moving from say 85% renewable electricity generation to the targeted 90%) may impose excessively high costs on the economy. Indeed, given that such an economy would have only ten percent of its electricity generated from non-renewable resources that would almost certainly be the case. How would that ten percent of generation capacity be distributed around the nation in such a way as to maintain efficiency?

2). maintaining or increasing electricity generation capacity while avoiding, reducing or displacing greenhouse gas emissions.

If this is such an important benefit surely this National Policy Statement (or some other statement) should consider the benefits of nuclear power in achieving this objective.

This statement reflects some muddled thinking about the role of “fuel” or the “energy source” in the generation of electricity. There is no known method of generating electricity that is 100% renewable. The word “renewable” refers only to the energy input or fuelling of the generator. For example, wind is a renewable energy resource, but a large-scale wind turbine assembly is built of many hundreds of tonnes of concrete and steel both above and below ground, and of course the turbines and blades are all built of other non-renewable resources.

The manufacture and placing of the concrete itself generates large tonnages of greenhouse In any construction, maintenance and replacement any forms of greenhouse gases will result.

3) (ii) *maintaining or increasing security of electricity supply at local, regional and national levels by diversifying the type and/or location of electricity generation.*

If unreliable and volatile sources of power are distributed widely then they require additional transmission lines to enable the managers of the grid to reroute power rapidly from one site to another.

Finally, if wind or other unreliable sources of electricity generation generate more than say 12 – 15% of total demand then each watt of such power must be backed up by a reliable generating source which must also be able to respond rapidly to changes in demand.

Such standby systems are by definition inefficient because they do not operate continually and hence their investment lies idle for much of the time. If the cost of these back-up facilities is taken into account then wind, and other unreliable renewable generators become an extremely expensive means of generating electricity unless they are kept to a small a mall percentage of total demand.

I seek the following changes to the proposal:

[give precise details].

1) The RMA does not appear to provide for the withdrawal of a National Policy Statement.

This would appear to be a serious deficiency in the legislation. After all, as a result of this and other National Policy Statements, many councils will change their plans to incorporate the objectives and policies as required by the National Policy Statement.

But many National Policy Statements are based on current scientific **knowledge and technology that can be superseded at any time.**

Developing an NPS is a reasonably quick process and enables governments to respond to changes in our knowledge and understanding.

However, we need to be able to respond equally rapidly to new knowledge and understanding that renders existing National Policy Statements and their incorporation into RMA documents obsolete.

2) The use of targets (as in the Preamble and the Objective) should be abandoned and that cost-effective price signals should be used to encourage any changes in resource allocation deemed necessary by Government recognise that renewable electricity generation that is dependent on an unreliable energy source, has the potential to destabilize the network and introduce instability to the network

3) The policy statement should also be rewritten to require plan writers and decision makers to have particular regard to the total cost of all renewable electricity generation, taking into account the full costs of any necessary standby generation plants.

A general conclusion.

Given the large number of internal conflicts, uncertain meanings, and unjustified assumptions, and given the large number of other policy documents guiding such decisions, we wonder if such an NPS may create more problems than it solves.

I also question whether there is a problem which needs to be addressed. The Reference Group report of May 2006 and the evaluation under Section 32 of the RMA did not identify any serious problem with current RMA practice, at least in relation to the specific issue of consenting of renewable energy generation plants.

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I wish to be heard in support of my submission IF A HEARING IS HELD IN CENTRAL OTAGO (Alexandra or Cromwell).

* If others make a similar submission, I will consider presenting a joint case with them at a hearing.

John Wilson Douglas.....

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

30 October 2008

Date

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

Address for service of submitter:	41 Glencarron St Alexandra
Telephone:	03 448 7474
Email	jdouglas.alx@xtra.co.nz
Contact person: <i>[name and designation, if applicable]</i>	John Douglas Research Manager Wildflower Walks Central Otago