



C O U N T I E S P O W E R

31 October 2008

Chairperson
Board of Inquiry – NPS for Renewable Electricity Generation
Ministry for the Environment
P.O. Box 10362
Wellington 6143

Dear Dr Somerville,

- 1) This is a submission on the proposed National Policy Statement for Renewable Electricity Generation. It is made on behalf of Counties Power Limited (CPL). Please refer all communications on this matter to:

Bob Lack
Counties Power Ltd
Private Bag 4
Pukekohe

ph 09 237 0361
email bob@countiespower.com

- 2) CPL is an electricity lines company operating in south Auckland and north Waikato. The company and its antecedent power board have developed and operated the local electricity network since 1925. Our network has about 35,500 customer connections and serves about 85,000 people. CPL is owned by the customers we serve.
- 3) The scope for CPL and other electricity lines companies to be involved in electricity generation has been limited by the Electricity Industry Reform Act. However, the restrictions have been progressively relaxed and the legislation now permits us to have some involvement, particularly in renewable generation. Our local customers / owners are keen for us to pursue this opportunity, and we are working on several small to medium sized developments.
- 4) CPL strongly supports the adoption of a National Policy Statement for Renewable Electricity Generation. As is noted in the proposed policy's preamble, many renewable resources are in areas with positive environmental or amenity values. We accept that some balance is required and we do not advocate open slather for development. However, we believe that it is important for relevant local authority plans to facilitate renewable generation rather than for every proposal to be seen as intrusive, as presently appears to be the case for many district and regional plans. To this end we support each of the proposed policies, with the minor changes mentioned below.

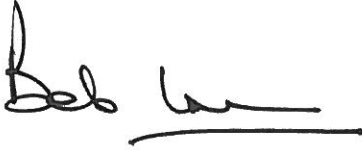
C O U N T I E S P O W E R L I M I T E D

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- 5) We are pleased to see in the definition of “renewable electricity generation activities” recognition of the fact that most generation will require connection to the local or national grid. It appears to us that the use of this phrase in policy 2 makes it clear that such connections are to be considered in that context. We submit that the same point could usefully be made explicit in policies 4 and 5, since the defined phrase does not appear in them as drafted. We suggest:
- a. Amend Policy 4(i) to conclude: “...renewable electricity generation and renewable electricity generation activities.”
 - b. Amend Policy 5 to conclude: “...renewable electricity generation and renewable electricity generation activities.”
- 6) We are pleased to see the support for small scale generation in policy 5. There are some practical issues here. There will be some customers who could use stand-alone generation but who will prefer to use a grid connection. There will be some customers who will wish to install exporting distributed generation but for whom a network connection is unavailable. We submit that the use of the word “enable” in policy 5 is appropriate and we ask the board to consider whether it could usefully be made even clearer that the intent of policy 5 is to enable customers and developers to use small renewable generation rather than to enable local authorities to require its use.
- 7) We note that the definition of “renewable electricity generation” specifies particular energy sources. While this list may appear exhaustive at present, it is quite possible that some other renewable energy source will be identified during the life of the policy statement. We submit that this definition should be extended to include a general provision, perhaps similar to that in the Electricity Act, where renewable energy is defined as meaning:
- “solar, wind, hydro, geothermal, biomass, tidal, wave, ocean current sources, or any other energy source that occurs naturally and the use of which will not permanently deplete New Zealand’s energy sources of that kind, because those sources are generally expected to be replenished by natural processes within 50 years or less of being used”*
- 8) Finally we suggest that the types of developments covered by this national policy statement should be extended to included co-generation projects. One way of reducing the country’s reliance on fossil fuels is to make better use of them when they are used. One practical example common in The Netherlands is to site gas-fired electricity generators at glass-houses, to use the “waste” heat from the generators to heat the glass-houses, and to use the “waste” CO₂ from the combustion to feed the plants. Where cogeneration can be added to existing thermal facilities, this captures usable energy while improving the environmental impact. Where new facilities are involved the environmental balance may need closer examination, but in our submission co-generation deserves favourable consideration under local authority plans and so should be included in this policy statement. We do not have a particular set of words to propose for inclusion, but we submit that the board should consider this issue and determine whether and how it can be accommodated.

9) We do wish to be heard in support of this submission and we are happy to consider joining with others in this.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Bob Lack', with a horizontal line underneath the signature.

Bob Lack
Commercial Manager