

**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

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 our submission relates to are:

*[give details]*

The Executive of Solar Action makes this submission regarding the following provisions of the proposal:

The Preamble

The "Matter of National Significance" statement.

The "Objective"

Policy 1.(i)

Policy 2.

Policy 3.

Policy 4. (i)

Policy 4.(ii)

Policy 5

Our submission is:

*[include –*

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

The Executive of Solar Action support the idea of the proposed national policy statement. However, we oppose the specific provisions as currently worded. We suggest amendments later in this submission

Our concerns are that the National Policy Statement as currently worded will not deliver the desired outcomes. Government leadership is crucial, now more than ever. 'Market forces', being reactive to external and internal business pressures rather than the long terms needs of society and the world, will not address the crucial issues that

New Zealand faces in time.

The National Policy Statement on Renewable Energy is a key opportunity to signal to the greater community that resource constraints will be a reality, and are better addressed sooner rather than later. While the main driver for renewable electricity generation implementation is climate change, a clear signalling of lead-times will assist businesses, communities and individuals to implement efficiencies and reductions in a timely fashion.

The Executive of Solar Action is of the view that, while the underlying idea behind the National Policy Statement given in the preamble is laudable, the target, timing and assumptions are wrong. The target given is a percentage of generation, but a total fixed amount of generation is not set. This means that the total is assumed to be able to increase indefinitely, yet generation depends on a fixed and finite set of resources. The time-frame is too long; major global energy restraints will impact on New Zealand well before the target date. Anticipations of 'growth' in light of the above are erroneous and dangerous.

It has to be realised that there are finite limits to energy resources, globally, nationally and locally. There are limits to supplies of stored energy and limits to sites for renewable energy installations. Underlying these issues is the question of what New Zealand's sustainable carrying-capacity is. The National Policy Statement for Renewable Electricity Generation should acknowledge the existence of an upper limit for electricity generation, and either quantify it, or identify a process for doing so.

Compounded percentage growth, both economic and physical, is unsustainable. Open-ended escalation in resource utilisation will therefore end at some point. In the national interests, it is better that we both signal the need for, and control the path of the required deceleration in demand and supply.

The Executive of Solar Action submits that there should be a fixed 'Energy Budget', and that the target be less than 100% of that Budget.

Solar Action would also point out that the peak of global energy production (oil, gas, and other resources) will be well passed by 2025, according to many expert appraisals. Not only do we have to identify an Energy Budget for the country, but we have to establish it beneath a sinking lid of global constraints. The Policy Statement should acknowledge this, and target a shorter timeframe.

Growth overall is clearly an unrealistic anticipation. There may well be growth in demand for electricity due to depletion of other forms of energy, coupled with a wish for more energy and resources, by more people. Our obligation to future generations is morally clear; they should be left with the wherewithal to feed, water and shelter themselves, while not suffering undue (or induced) social stress. On current projections, we will fail that test. The proposed National Policy Statement in its current form also fails this test.

I seek the following changes to the proposal:

*[give precise details]*

Preamble:

The Executive of Solar Action submits that the Preamble should acknowledge the finite limits to (particularly) physical growth. The phrase “balancing the competing values” fails to recognise that the appraisal of the values of largely intrinsic, finite resources will be a process of repeat applications to exploit these resources by well-funded corporations, opposed only by a small number of community volunteers with limited funding. This is a deficiency of the RMA, which this statement does not address.

Matter of National Significance:

The Executive of Solar Action agrees with this statement, however we submit that a defined ‘cap’ to electricity generation should be mentioned.

Objective:

As stated in the “reasons for our views” section above, there needs to be a specific, fixed, and quantified ‘Energy Budget’ limit to electricity generation.

Policy 1.(i):

We submit that the word ‘increasing’ should be removed from this section.

Policy 2.:

We generally agree with the wording of this policy.

Policy 3.:

We agree with this policy.

Policy 4. (i):

This provision aims to “enable” corporations (“generators”) to stake out key areas for new renewable electricity generation. We submit that does not seem to be a rational or desirable method for determining the location of future renewable electricity generation sites.

Policy 4.(ii):

We agree with this policy,

Policy 5.:

The Executive of Solar Action believe this policy is a key objective. As all renewable energy is of solar origin, the more on-site or local capture of energy that occurs, the better. Longer transmission paths lead to more losses.

We wish to be heard in support of our submission.

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

(Electronic submission).....

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

31/10/08.....

Date

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

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