31 October 2019

Freshwater submissions
Ministry for the Environment
P O Box 10362
Wellington 6143

By email: consultation.freshwater@mfe.govt.nz

Dear Sir / Madam,

Re: Action for healthy waterways and draft National Policy Statement for Freshwater Management

The Southern Generation Limited Partnership (SGLP) appreciates the opportunity to submit to the Ministry for the Environment on the draft National Policy Statement for Freshwater Management (NPS-FM).

SGLP consists of southern lines companies The Power Company Ltd (TPC) and Electricity Invercargill Ltd (EIL), and Central Otago-based Pioneer Generation Ltd, and is a generation investment partnership. SGLP owns two windfarms – Mt Stuart, near Milton and Flat Hill near Bluff. In December 2015 SGLP purchased the Aniwhenua hydro power station from Nova Energy. Total annual output of SGLP’s distributed generation plant is more than 200GWhs with another 30GWh under construction.

SGLP supports the submissions by the Independent Electricity Generators Association (IEGA) and Pioneer Energy Limited. Our principal concerns relate to the potential impact on smaller hydro generation plant and consequent socio-economic impact on local communities near our hydro electricity generating plant (which does not appear to have been fully analysed by officials at this stage). We also suggest there are significant risks associated with achieving a quality outcome given the significant amount of work to be undertaken if these changes are fully implemented in a very short time frame. SGLP supports the Government’s focus on improving water quality and suggests a specific focus initially on raising the quality of water identified to be poor quality and over time raising the standard progressively for other waterways.

Please contact me if you require further clarification in relation to this submission.

Yours sincerely,

Fraser Jonker
Managing Director

SOUTHERN GENERATION LIMITED PARTNERSHIP