#14

INCOMPLETE

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Page 1: Introduction

Q1 Name (first and last name)

Bryan Leyland MSc, DistFEngNZ, FIMechE, FIEE(rtd), MRSNZ.

Q2 Email

Privacy of natural persons

Q3 Is this an individual submission, or is it on behalf of a group or organisation?

Individual

Q4 Which group do you most identify with, or are representing?

Electricity sector

Q5 Business name or organisation (if applicable)

Bryan Leyland Consulting Engineer

Q6 Position title (if applicable)

MD

Q7 Important information about your submission (important to read)The information provided in submissions will be used to inform the Ministry of Business, Innovation and Employment's (MBIE's) work on Accelerating renewable energy and energy efficiency.We will upload the submissions we receive and publish them on our website. If your submission contains any sensitive information that you do not want published, please indicate this in your submission.The Privacy Act 1993 applies to submissions. Any personal information you supply to MBIE in the course of making a submission will only be known by the team working on the Accelerating renewable energy and energy efficiency.Submissions may be requested under the Official Information Act 1982. Submissions provided in confidence can usually be withheld. MBIE will consult with submitters when responding to requests under the Official Information Act 1982.We intend to upload submissions to our website at www.mbie.govt.nz. Can we include your submission on the website?	**Yes**
Q8 Can we include your name?	**Yes**
Q9 Can we include your organisation (if submitting on behalf of an organisation)?	**Yes**
Q10 All other personal information will not be proactively released, although it may need to be released if required under the Official Information Act. Please indicate if there is any other information you would like withheld.	**Respondent skipped this question**

Page 2

Q11 Where are you located?	**Auckland / Tamaki-makau-rau**
Q12 In what region or regions does your organisation mostly operate?	**Respondent skipped this question**

Page 3: Areas you wish to provide feedback on

Q13 Part A relates to process heat.Please indicate which sections, if any, you would like to provide feedback on.	**Section 5: Boosting investment in renewable energy and energy efficiency technologies**

Q14 Part B relates to renewable electricity generation. Please indicate which sections, if any, you would like to provide feedback on.	**Section 7: Enabling renewables uptake under the Resource Management Act 1991** , **Section 8: Supporting renewable electricity generation investment** , **Section 9: Facilitating local and community engagement in renewable energy and energy efficiency** , **Section 10: Connecting to the national grid,** **Section 11: Local network connections and trading arrangements**

Page 4: Section 1: Addressing information failures

Q15 Option 1.1 would require large energy users to report their emissions and energy use annually, publish Corporate Energy Transitions Plans and conduct energy audits every four years.Do you support this option?	**Respondent skipped this question**
Q16 Please explain your answer	**Respondent skipped this question**
Q17 Which parts (set out in Table 3) do you support?	**Respondent skipped this question**
Q18 Please explain your answer	**Respondent skipped this question**
Q19 What public reporting requirements (listed in Table 3) should be disclosed?	**Respondent skipped this question**
Q20 In your view, should businesses be expected to include transport energy and emissions in these reporting requirements?	**Respondent skipped this question**
Q21 For manufacturers: what will be the impact on your business to comply with the requirements?	**Respondent skipped this question**
Q22 Option 1.1. Suggests that requirements to publish Corporate Energy Transition Plans should apply to large energy users, and propses defining large energy users as those with an annual energy spend (purchased) of greater than $2 million per annum.Do you agree with this definition?	**Respondent skipped this question**

Q23 If you selected no, please describe what in your view would be an appropriate threshold to define ‘large energy users’.	**Respondent skipped this question**
Q24 Is there any potential for unnecessary duplication under these proposals and the disclosures proposed in the MBIE-Ministry for the Environment discussion document Climate-related Financial Disclosures – Understanding your business risks and opportunities related to climate change, October 2019?	**Respondent skipped this question**

Page 5: Section 1 - Option 1.2: Electrification information package and feasibility studies

Q25 Do you support the proposal to develop an electrification information package?	**Respondent skipped this question**
Q26 Would an electrification information package be of use to your business?	**Respondent skipped this question**
Q27 Do you support customised low-emission heating feasibility studies?	**Respondent skipped this question**
Q28 In your view, which of the components should be scaled up and/or prioritised?	**Respondent skipped this question**
Q29 Would a customised low-emission heating feasibility study be of use to your business?	**Respondent skipped this question**
Q30 Please describe any components other than those identified that could be included in an information package.	**Respondent skipped this question**

Page 6: Section 1 - Option 1.3: Provide benchmarking information for food processing industries

Q31 Do you support benchmarking in the food processing sector?	**Respondent skipped this question**
Q32 Would benchmarking be suited to, and useful for, other industries, such as wood processing?	**Respondent skipped this question**
Q33 Do you believe government should have a role in facilitating this or should it entirely be led by industry?	**Respondent skipped this question**
Q34 Please explain your answer	**Respondent skipped this question**

Page 7: Section 2: Developing markets for bioenergy and direct geothermal use

Q35 Do you agree that some councils have regional air quality rules that are barriers to wood energy?	**Respondent skipped this question**
Q36 Please provide examples of regional air quality rules that you see as barriers to wood energy. Please also note which council's plan you are referring to.	**Respondent skipped this question**
Q37 Do you agree that a National Environmental Standards for Air Quality (NESAQ) users' guide on the development and operation of the wood energy facilities will help to reduce regulatory barriers to the use of wood energy for process heat?	**Respondent skipped this question**
Q38 What do you consider a NESAQ users' guide should cover? Please provide an explanation if possible.	**Respondent skipped this question**
Q39 Please describe any other options that you consider would be more effective at reducing regulatory barriers to the use of wood energy for process heat.	**Respondent skipped this question**
Q40 In your opinion, what technical rules relating to wood energy would be better addressed through the NESAQ than through the proposed users' guide (option 2.1)?	**Respondent skipped this question**

Page 8: Section 2 - continued: Developing markets for bioenergy and direct geothermal use

Q41 In your view, could the Industry Transformation Plans stimulate sufficient supply and demand for bioenergy to achieve desired outcomes?	**Respondent skipped this question**
Q42 What other options are worth considering?	**Respondent skipped this question**
Q43 Is Government best placed to provide market facilitation in bioenergy markets?	**Respondent skipped this question**
Q44 How could Government best facilitate bioenergy markets?Please be as specific as possible, giving examples.	**Respondent skipped this question**
Q45 In your view, how can government best support direct use of geothermal heat?	**Respondent skipped this question**
Q46 What other options are worth considering?	**Respondent skipped this question**

Page 9: Section 3: Innovating and building capability

Q47 Do you agree that de-risking commercially viable low-emission technology should be a focus of government support on process heat?	**Respondent skipped this question**
Q48 Do you agree that diffusing commercially viable low-emission technology should be a focus of government support on process heat?	**Respondent skipped this question**
Q49 Is Energy Efficiency and Conservation Authority (EECA) grant funding to support technology diffusion the best vehicle for this?	**Respondent skipped this question**
Q50 For manufacturers and energy service experts: would peer learning and lead to reducing perceived technology risks?	**Respondent skipped this question**
Q51 For manufacturers and energy service experts: would on-site technology demonstration visits lead to reducing perceived technology risks?	**Respondent skipped this question**
Q52 Is there a role for the Government in facilitating this?	**Respondent skipped this question**

Page 10: Section 3 (continued): Innovating and building capability

Q53 For emissions-intensive and highly integrated (EIHI) stakeholders: What are your views on our proposal to collaborate to develop low-carbon roadmaps?	**Respondent skipped this question**
Q54 Would low-carbon roadmaps assist in identifying feasible technological pathways for decarbonisation?	**Respondent skipped this question**
Q55 What are the most important issues that would benefit from a partnership and co-design approach?	**Respondent skipped this question**
Q56 What, in your view, is the scale of resourcing required to make this initiative successful?	**Respondent skipped this question**

Page 11: Section 4: Phasing out fossil fuels in process heat

Q57 Do you agree with the proposal to ban new coal-fired boilers for low and medium temperature requirements?	**Respondent skipped this question**

Q58 Do you agree with the proposal to require existing coal-fired process heat equipment for end-use temperature requirements below 100 degrees Celsius to be phased out by 2030?	**Respondent skipped this question**
Q59 Referring to Question 56 - is this ambitious or is it not doing enough?	**Respondent skipped this question**
Q60 For manufacturers: what would be the likely impacts or compliance costs on your business of a ban on new coal-fired process heat equipment?	**Respondent skipped this question**
Q61 For manufacturers: what would be the likely impacts or compliance costs on your business of requiring existing coal-fired process heat equipment supplying end-use temperature requirements below 100°C to be phased out by 2030.	**Respondent skipped this question**
Q62 Could the Corporate Energy Transition Plans (Option 1.1) help to design a more informed phase out of fossil fuels in process heat?	**Respondent skipped this question**
Q63 Would a timetabled phase out of fossil fuels in process heat be necessary alongside the Corporate Energy Transition Plans?	**Respondent skipped this question**
Q64 In your view, could national direction under the Resource Management Act (RMA) be an effective tool to support clean and low greenhouse gas-emitting methods of industrial production?	**Respondent skipped this question**
Q65 If yes, how?	**Respondent skipped this question**
Q66 In your view, could adoption of best available technologies be introduced via a mechanism other than the RMA?	**Respondent skipped this question**

Page 12: Section 5: Boosting investment in energy efficiency and renewable energy technologies

Q67 Do you agree that complementary measures to the New Zealand Emissions Trading Scheme (NZ-ETS) should be considered to accelerate the uptake of cost-effective clean energy projects?	**Strongly disagree**

Q69 In your view what is a bigger barrier to investment in clean energy technologies, internal competition for capital or access to capital?

Respondent skipped this question

Q70 If you favour financial support, what sort of incentives could be considered?

Respondent skipped this question

Q71 What are the benefits of these incentives?

Respondent skipped this question

Q72 What are the risks of these incentives?

Respondent skipped this question

Q73 What are the costs of these incentives?

Respondent skipped this question

Q74 What measures other than those identified above could be effective at accelerating investment in clean energy technologies?

Respondent skipped this question

Page 13: Section 6: Cost recovery mechanisms

Q75 What is your view on whether cost recovery mechanisms should be adopted to fund policy proposals in Part A of the Accelerating renewable energy and energy efficiency discussion document?

Respondent skipped this question

Q76 What are the advantages of introducing a levy on consumers of coal to fund process heat activities?

Respondent skipped this question

Q77 What are the disadvantages of introducing a levy on consumers of coal to fund process heat activities?

Respondent skipped this question

Page 14: Section 7: Enabling development of renewable energy under the Resource Management Act 1991

Q78 Do you agree that the current NPSREG gives sufficient weight and direction to the importance of renewable energy?

Strongly agree

Q79 What changes to the NPSREG would facilitate future development of renewable energy?

no changes needed

Q80 What policies could be introduced or amended to provide sufficient direction to councils regarding the matters listed in points a-i mentioned on pages 60-61 of the discussion document?

No changes needed

Q81 How should the NPSREG address the balancing of local environmental effects and the national benefits of renewable energy development in RMA decisions?

No changes needed

Q82 What are your views on the interaction and relative priority of the NPSREG with other existing or pending national direction instruments?

No changes needed

Q83 Do you have any suggestions for how changes to the NPSREG could help achieve the right balance between renewable energy development and environmental outcomes?

The right balance is achieved by treating renewable energy development the same as any other development

Q84 What objectives or policies could be included in the NPSREG regarding councils' role in locating and planning strategically for renewable energy resources?

They should treat renewable energy the same as anything else. This

Q85 Can you identify any particular consenting barriers to development of other types of renewable energy than REG, such as green hydrogen, bioenergy and waste-to-energy facilities?

No.

Q86 Can any specific policies be included in a national policy statement to address these barriers?

Streamline the RMA and NPSREG to facilitate development of better economic.

Q87 What specific policies could be included in the NPSREG for small-scale renewable energy projects?

None needed.

Q88 The NPSREG currently does not provide any definition or threshold for "small and community-scale renewable electricity generation activities". Do you have any view on the definition or threshold for these activities?

They should only go ahead if they are economically beneficial. They have no special merit.

Q89 What specific policies could be included to facilitate re-consenting consented but unbuilt wind farms, where consent variations are needed to allow the use of the latest technology?

the consent process goes into too much detail. Consent should be given for a typical windfarm over a limited area.

Q90 Are there any downsides or risks to amending the NPSREG?

Not that I know of

Page 15: Section 7 - continued

Q91 Do you agree that National Environmental Standards (NES) would be an effective and appropriate tool to accelerate the development of new renewables and streamline re-consenting?

Neither agree nor disagree

Q92 What are the pros of using National Environmental Standards as a tool to accelerate the development of new renewables and streamline re-consenting?

Uniform standards between councils

Q93 What are the cons of using National Environmental Standards as a tool to accelerate the development of new renewables and streamline re-consenting?

No comment

Q94 What do you see as the relative merits and priorities of changes to the NPSREG compared with work on NES?

No comment

Q95 What are the downsides and risks to developing NES?

No comment

Q96 What renewables activities (including both REG activities and other types of renewable energy) would best be suited to NES?

No comment

Q97 What technical issues could best be dealt with under a standardised national approach?

No comment

Q98 Would it be practical for NES to set different types of activity status for activities with certain effects, for consenting or re-consenting?

Please explain your answer:
Not even sure what you mean

Q99 Are there any aspects of renewable activities that would have low environmental effects and would be suitable for having the status of permitted or controlled activities under the RMA? Please provide details.

No comment

Q100 Do you have any suggestions for what rules or standards could be included in NES or National Planning Standards to help achieve the right balance between renewable energy development and environmental outcomes?

No comment

Q101 Compared to the NPSREG or National Environment Standards, would National Planning Standards or any other RMA tools be more suitable for providing councils with national direction on renewables ?

A different RMA tool would be more suitable (please specify):
No comment

Q102 Please explain your answer

Respondent skipped this question

Page 16: Section 7 - continued

Q103 Are there opportunities for non-statutory spatial planning techniques to help identify suitable areas for renewables development (or no go areas)?

Respondent skipped this question

Q104 Do you have any comments on potential options for pre-approval of renewable developments?

Respondent skipped this question

Q105 Are the current National Policy Statement on Electricity Transmission (NPSET) and National Environmental Standards for Electricity Transmission Activities (NESETA) fit-for-purpose to enable accelerated development of renewable energy?

NPSET
Fit-for-purpose
NESETA
Fit-for-purpose
Please explain your answer
Probably

Q106 What changes (if any) would you suggest for the NPSET and NESETA to accelerate the development of renewable energy?

None

Q107 Can you suggest any other options (statutory or non-statutory) that would help accelerate the future development of renewable energy?

allow geothermal stations to remit the carbon dioxide without penalty

Page 17: Section 8: Supporting renewable electricity generation investment

Q108 Do you agree there is a role for government to provide information, facilitate match-making and/or assume some financial risk for PPAs?

provide information	**Strongly disagree**
facilitate match-making	**Strongly disagree**
assume some financial risk	**Strongly disagree**

Q109 Would support for PPAs effectively encourage electrification?

No

Q110 Would support for PPAs effectively encourage new renewable generation investment?

No

Q111 How could any potential mismatch between generation and demand profiles be managed by the Platform and/or counterparties?

Ensure that intermittent reusable energy provides backup or pays for it.

Q112 Please rank the following variations on PPA Platforms in order of preference.1 = most preferred, 4 = least preferred.

Contract matching service	**2**
State-sector led	**3**
Government guaranteed contracts	**4**
Clearing house	**1**

Q113 What are your views on Contract Matching Services?

Waste of time

Q114 What are your views on State sector-led PPAs?

Even worse. why should the state get involved.

Q115 What are your views on Government guaranteed contracts?

Keep the government felt of private business. Government guarantees will encourage inefficiency.

Q116 What are your views on a Clearing house for PPAs?

Why can't the industry sort i out for itself?

Q117 For manufacturers: what delivered electricity price do you require to electrify some or all of your process heat requirements?

Don't make anything

Q118 For manufacturers: is a long-term electricity contract an attractive proposition if it delivers more affordable electricity?

Yes,
Please explain your answer:
The chances of getting affordable electricity by promoting wind and solar power are very low indeed.

Q119 For investors / developers: what contract length and price do you require to make a return on an investment in new renewable electricity generation capacity?

NA

Q120 For investors / developers: is a long-term electricity contract an attractive proposition if it delivers a predictable stream of revenues and a reasonable return on investment?

Yes,
Please explain your answer:
But the chances are it will yield less then risking spot price.

Page 18: Section 8 - continued

Q121 Do you consider the development of the demand response (DR) market to be a priority for the energy sector?

Yes,
Please explain your answer:
New Zealand once had the best demand side system in the world – full control of water heaters. The electricity reforms destroyed this and the situation needs to be restored

Q122 Do you think that demand response (DR) could help to manage existing or potential electricity sector issues?

Yes

Q123 What are the key features of demand response markets?

An energy use such as water heating, large-scale refrigeration and, maybe, pumping that can be switched off for limited periods at any time.

Q124 Which features of a demand response market would enable load reduction or asset use optimisation across the energy system?

Control of hot water, large-scale refrigeration and maybe pumping.

Q125 Which features of a demand response market would enable the uptake of distributed energy resources?

Consumer control of hot water and, maybe, refrigeration

Q126 What types of demand response services should be enabled as a priority?

Restoring hot water control using modern technology so that every water heater in New Zealand can be switched on or off at once or some of them or individual water heaters

Q127 Which services make sense for New Zealand?

sophisticated control of water heating

Page 19: Section 8 - continued

Q128 Would energy efficiency obligations effectively deliver increased investment in energy efficient technologies across the economy?

No

Q129 Is there an alternative policy option that could deliver on this aim more effectively?

Yes (please specify):
Leave it to simple economics and the market

Q130 If progressed, what types of energy efficiency measures and technologies should be considered in order to meet retailer/distributor obligations?

None

Q131 Should these be targeted at certain consumer groups?

No

Q132 Do you support the proposal to require electricity retailers and/or distributors to meet energy efficiency targets?

I do not support the propsal,
Please explain your answer:
Energy inefficiency costs money. The consumers in the market count sort it out.

Q133 Which entities would most effectively achieve energy savings?

Domestic water heaters

Q134 What are the likely compliance costs of this policy?

A few hundred dollars per existing water heater.

Page 20: Section 8 - continued

Q135 Do you agree that the development of an offshore wind market should be a priority for the energy sector?

Strongly disagree

Q136 What do you perceive to be the major benefits to developing offshore wind assets in New Zealand?

None, offshore wind – proved to be very expensive overseas and it could be even more expensive in New Zealand because of deeper water. It is also maintenance intensive

Q137 What do you perceive to be the major costs to developing offshore wind assets in New Zealand?

The cost of the wind turbines, the cost of the support and foundations needed, the cost of the power cables and the light and the cost of providing backup when the wind doesn't blow

Q138 What do you perceive to be the major risks to developing offshore wind assets in New Zealand?

Major increase in the cost of electricity. Unreliable windfarms going broke and being abandoned. Sudden loss of all generation if the wind blows too hard

Page 21: Section 8 - continued

Q139 This policy option involves a high level of intervention and risk. Would another policy option better achieve our goals to encourage renewable energy generation investment?

Yes (please specify):
adopt nuclear power. Encourage hydropower and geothermal

Q140 Could the proposed policy option be re-designed to better achieve our goals?

Yes (please specify):
Abandon the policy

Q141 Should the Government introduce Renewable Portfolio Standards (RPS) requirements?

No

Q142 At what level should a RPS quota be set to incentivise additional renewable electricity generation investment?

Zero

Q143 Should RPS requirements apply to all electricity retailers?

No,
Please explain your answer:
We don't need a RPS. It leads to huge profits for the developers cease and massively increases the cost of electricity

Q144 Should RPS requirements apply to all major electricity users?

No,
Please explain your answer:
We should not have an RPS

Q145 What would be an appropriate threshold for the inclusion of major electricity users (i.e. annual consumption above a certain GWh threshold)?

no threshold, no RPS

Q146 Would a government backed certification scheme support your corporate strategy and export credentials?

No

Q147 What types of renewable projects should be eligible for renewable electricity certificates?

None. let them be built on their merits.

Q148 If this policy option is progressed, should electricity retailers be permitted to invest in energy efficient technology investments to meet their renewable portfolio standards? (See option 8.3 on energy efficiency obligations).

No,
Please add a comment:
It will lead to the inefficient use of capital

Q149 If this policy option is progressed, should major electricity users be permitted to invest in energy efficient technology investments to meet their renewable portfolio standards? (See option 8.3 on energy efficiency obligations).

No,
Please add a comment:
Only if it is economic in their terms

Q150 What are the likely administrative and compliance costs of this policy for your organisation?

Massive

Page 22: Section 8 - continued

Q151 This policy option involves a high level of intervention and risk. Would another policy option better achieve our goals to encourage renewable energy generation investment?

Yes (please specify):
The ICCC report says that you cannot do without thermal generation in all years. Some generation as a result of burning associated gas at oil wells. If you stop it, gas will have to be flared.

Q152 Could this policy option be re-designed to better achieve our goals?

Yes (please expand):
Abandon it.

Q153 Do you support the managed phase down of baseload thermal electricity generation?

Strongly against

Q154 Would a strategic reserve mechanism adequately address supply security, and reduce emissions affordably, during a transition to higher levels of renewable electricity generation?

Definitely would not

Q155 Under what market conditions should thermal baseload held in a strategic reserve be used?

Whenever there is a risk of shortage. This means that it will often run early on in years that turn out to have normal rainfall even though there appeared to be a risk of drought.

Q156 Would you support requiring thermal baseload assets to operate as peaking plants or during dry winters?

Yes

Q157 What is the best way to meet resource adequacy needs as we transition away from fossil-fuelled electricity generation and towards a system dominated by renewables?

Read the ICCC report. adopt nuclear power.

Page 23: Section 8 - continued

Q158 Do you have any views regarding the options to encourage renewable electricity generation investment that we considered, but are not proposing to investigate further? (See pages 90 - 92 of the Accelerating renewable energy and energy efficiency discussion document).

I have been in the power generation industry for 60 years and, in particular, hydropower. I see nothing special about renewable electricity. It is just another way of keeping our economy working, providing jobs, and keeping Households and dry. As there is no convincing evidence that man-made greenhouse gases cause dangerous global warming, it is almost certainly an exercise in futility.

Page 24: Section 9: Facilitating local and community engagement in renewable energy and energy efficiency

Q159 Should New Zealand be encouraging greater development of community energy projects?

No

Q160 What types of community energy project are most relevant in the New Zealand context?

Anything that is economic

Q161 What are the key benefits of a focus on community energy?

If it is economic, it is a good idea.

Q162 What are the key downsides or risks of a focus on community energy?

The chances are that it will need connection to the grid and take power only when the wind is not blowing in the sun is not shining and, anyway, the group is struggling to feed remaining load. It is unlikely that it will pay the realistic costs on the connection

Q163 Have we accurately identified the barriers to community energy proposals?

No,
Please explain your answer:
I have studied community energy proposals. Virtually all of them need batteries which are hugely expensive. They can't afford enough batteries to get them through even a moderate period of low wind and solar power so they either need diesel generator backup or a connection to the grid. This makes them an economic.

Q164 Which barriers do you consider most significant? You may select more than one answer.

Electricity market arrangements

Q165 Are the barriers noted above in relation to electricity market arrangements adequately covered by the scope of existing work across the Electricity Authority and electricity distributors?

No - they're not adequately covered by existing work,
Please add a comment:
The electricity market fails to recognise the need for sufficient capacity to keep the lights on during peak demand periods and the need to have sufficient energy in reserve to get us through a dry year. All it has done is increase prices, provide windfall profit for the generators and put us at risk in a dry year.

Q166 What do you see as the pros of a clear government position on community energy?

Why have any position? If it is economic, it will go ahead.

Q167 What do you see as the cons of a clear government position on community energy?

Government interference in the electricity business. Inevitably lead to increased prices and, probably, a less reliable supply.

Q168 What do you see as the pros of government support for pilot community energy projects?

None

Q169 What do you see as the cons of government support for pilot community energy projects?

Government interference in the electricity business. Inevitably lead to increased prices and, probably, a less reliable supply.

Q170 Are there any other options you can suggest that would support further development of community energy initiatives?

Why should it be supported? If it is economic, it will go ahead.

Page 25: Section 10: Connecting to the national grid

Q171 Please select the option or combination of options, if any, that would be most likely to address the first mover disadvantage.

None of the options

Q172 What do you see as the disadvantages or risks of Option 10.1?

Will lead to increases cost of transmission. transmission for wind and solar power is relatively more expensive than for other forms of power generation because of the low capacity factor.

Q173 What do you see as the disadvantages or risks of Option 10.2?

Transmission pricing is currently in a mess. Don't make it worse.

Q174 What do you see as the disadvantages or risks of Option 10.3.1?

I think it means that a whole lot of investment should be written off if the developers got cold feet. This will increase the cost to consumers.

Q175 What do you see as the disadvantages or risks of Option 10.3.2?

The consumers will be paying for overcapacity and there is a reasonable chance that the new schemes will never be built.

Q176 Would introducing a requirement, or new charge, for subsequent customers to contribute to costs already incurred by the first mover create any perverse incentives?	**No**
Q177 Are there any additional options that should be considered?	Yes (please specify): Consider nuclear power. It is safe cheap and reliable Solves all the problems.

Page 26: Section 10 (continued): Connecting to the national grid

Q178 Do you think that there is a role for government to provide more independent public data?	**No,** Why or why not?: I don't know what sort of data that you are talking about.
Q179 Is there a role for Government to provide independent geospatial data (e.g. wind speeds for sites) to assist with information gaps?	**No**
Q180 Should MBIE's Electricity Demand and Generation Scenarios (EDGS) be updated more frequently?	**Yes**
Q181 If you said yes, how frequently should they be updated?	**Every two years**
Q182 Should MBIE's EDGS provide more detail, for example, information at a regional level?	**No,** Please provide information on what you would find useful: More and better information on the risks of shortages in a dry year. But it is the system operator that should be doing this work.
Q183 Should the costs to the Crown of preparing EDGS be recovered from Transpower, and therefore all electricity consumers (rather than tax-payers)?	**Yes - it should be recovered from Transpower (all electricity consumers)**
Q184 Would you find a users' guide (on current regulation and approval process for getting an upgraded or new connection) helpful?	**No,** Please add a comment: I don't think it is all that difficult. I'm not sure it is needed.
Q185 What information would you like to see in such a guide?	**Respondent skipped this question**
Q186 Who would be best placed to produce a guide?	**Respondent skipped this question**

Page 27: Section 10 (continued): Connecting to the national grid

Q187 Do you think that there is a role for government in improving information sharing between parties to enable more coordinated investment?

No,
Why or why not?:
Governments always mess things up.

Q188 Is there value in the provision of a database (and/or map) of potential renewable generation and new demand, including location and potential size?

No

Q189 If so, who would be best to develop and maintain this?

this was done for more hydropower years ago and turned out to be of very little use in the end. It would be a huge job to find Chris competent consultants to do the work and do would be huge differences between different consultants. An eexpensive and futile exercise

Q190 How should it be funded?

Not at all.

Q191 Should measures be introduced to enable coordination regarding the placement of new wind farms?

No,
Please expand on your answer.:
I don't see that there is any need. Is there?

Q192 Are there other information sharing options that could help address investment coordination issues? What are they?

Not that I know of

Page 28: Section 11: Local network connections and trading arrangements

Q193 Have you experienced, or are you aware of, significant barriers to connecting to the local networks? Please describe them.

No

Q194 Are there any barriers that will not be addressed by current work programmes outlined on pages 118 - 122 of the discussion document?

Not that I know of

Q195 Should the option to produce a users' guide (see Option 10.6 on page 110) also include the process for getting an upgraded or new distribution line?

No,
Please add a comment:
It's not difficult! I have done it.

Q196 Are there other Section 10 information options that could be extended to include information about local networks and distributed generation?

No

Q197 Do the work programmes outlined on pages 118 - 122 cover all issues to ensure the settings for connecting to and trading on the local network are fit for purpose into the future?

Respondent skipped this question

Q198 Are there things that should be prioritised, or sped up?

No

Q199 What changes, if any, to the current arrangements would ensure distribution networks are fit for purpose into the future?

They have been fit for purpose for more than 100 years. Just let the lines companies do their job as they have always done.

Page 29: Additional comments

Q200 Do you have any additional feedback?

Yes. I asume that "renewable energy" means wind and solar power. Both are intermittent and solar power is least in winter when we need it most and absent every night. Wind power is least in the autumn when there are, quite often, periods of several days when there is virtually no wind all over New Zealand. The document does not mention the need for a huge amount of electricity storage which will be hugely expensive. As the ICCC report pointed out batteries are far too expensive to be contemplated and, anyway, can't store energy economically for more than a few days. Some storage hydro could help but lead to very expensive. As the ICCC report points out New Zealand will need gas for backup for hydropower and, even more gas to back up wind and solar power. Yet the moratorium on gas exploration will guarantee that gas is not available.

Nothing in this document indicate whether or not renewable energy – especially community energy – could make a significant contribution to providing an economical and reliable supply.

Q201 You may upload additional feedback as a file.File size limit is 16MB. We accept PDF or DOC/DOCX.

Respondent skipped this question