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Energy Markets Policy
Ministry of Business, Innovation and Employment (MBIE)
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DCC SUBMISSION ON ACCELERATING RENEWABLE ENERGY AND ENERGY EFFICIENCY

Introduction

1. The Dunedin City Council (DCC) welcomes the opportunity to submit feedback on the Discussion Document: Accelerating renewable energy and energy efficiency.
2. Dunedin has an ambitious goal to be a net carbon zero city by 2030, and supports the Government's aim for a carbon neutral future for New Zealand and the acceleration of renewable energy and energy efficiency development.

Submission

3. The DCC notes that the development of renewable energy and energy efficiency in New Zealand has alignment with Dunedin's Energy Plan goals in so far as it:
 - takes advantage of economic opportunities in a changing energy context;
 - saves costs and enhances quality of life from energy efficiency improvements;
 - boosts the city's energy security and ability to adapt to future change; and
 - aims to reduce Dunedin's climate change and environmental effects.
4. A commitment to energy efficiency and investigating innovative renewable energy solutions are also key aspects of Te Ao Tūroa – The Natural World, Dunedin's Environmental Strategy.

Part A – Encouraging energy efficiency and the uptake of renewable fuels in industry

5. DCC supports the proposal to require large energy users to report emissions and energy use, publish Corporate Energy Transition Plans and conduct energy audits. As a signatory to the International Covenant of Mayors, and as a member of the Carbon Emissions Management and Reduction Scheme (CEMARS), the DCC is committed to reporting emissions and their impacts. As part of Dunedin's current 10 year plan, the DCC has also produced a high-level carbon assessment of major projects over the next 10 years – the first of its kind in New

Zealand. The DCC supports MBIE's proposal requiring other large energy users to follow similar processes of transparency.

6. DCC supports the development of a comprehensive user's guide on application of the National Environmental Standards for Air Quality to wood energy. Improved provision of reliable information on wood boiler air quality outcomes will benefit both energy users considering wood boilers, as well as appropriate council interpretation of applicable air quality rules. Dunedin has significant biomass resources available locally, and further uptake of biomass energy will support our climate change and economic development goals.

Part B – Accelerating renewable electricity generation and infrastructure

7. As noted in DCC's recent submission to the Ministry for the Environment's Resource Management Issues and Options Paper (February 2020), the DCC supports the NZ Emissions Trading Scheme as the main policy tool to address climate change mitigation, and a more permissive regulatory framework for certain activities that are necessary to transition to a low emissions economy. The DCC supports MBIE's proposal for providing greater clarity to councils in how to provide for renewable energy projects in consenting and planning processes, as well as reduce cost and uncertainty for project proponents.
8. The DCC encourages government support for local and community energy engagement, in particular, for community energy pilot projects and for diffusion (i.e. the gap between pre-commercialisation and full commercialisation of renewable energy technologies). In addition to financial incentives for clean energy uptake, this will reduce perceived risk in the marketplace and create enhanced opportunities for training and building clean energy capability.

Conclusion

9. The DCC commends the Government's forward-thinking in considering the opportunities for accelerating future development of renewable energy and energy efficiency in New Zealand.

Yours faithfully,

Aaron Hawkins
Mayor of Dunedin

