#70

COMPLETE

Collector: Final submissions link (Web Link)
Started: Friday, February 28, 2020 11:28:10 AM
Last Modified: Friday, February 28, 2020 12:20:23 PM
Time Spent: 00:52:12

Page 1: Introduction

Q1 Name (first and last name)

Privacy of natural persons

Q2 Email

Privacy of natural persons

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

On behalf of a group or organisation

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

Local government

Q5 Business name or organisation (if applicable)

Greater Wellington Regional Council

Q6 Position title (if applicable)

Strategic Advisor

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?	**No**
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?	**Respondent skipped this question**
Q12 In what region or regions does your organisation mostly operate?	**Wellington / Te Whanga-nui-a-Tara**

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**

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?	**Agree**
Q68 Would you favour regulation, financial incentives or both?	**Respondent skipped this question**

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?

Given the complexity of the barriers to investment in energy efficiency and renewable energy technologies, it is likely that an incentive based approach will be needed to drive innovation and achieve a significant improvement in energy efficiency.

For example, the ETS alone is unlikely to significantly improve the poor ‘wire to water’ energy efficiency of the three-waters infrastructure because the cost of power is not significant enough to overcome the barriers. Factors contributing to the industry maintaining the status quo include a long-life high-cost asset base, engineering design standards that are difficult to change, slow development of new technologies by industry, often poor accountability framework to improve efficiency, and limited awareness of the extent of the problem. It is estimated that as much as 2.8PJ of energy is wasted in the three-waters sector every year in NZ (based on 40% of the approx. 7PJ p.a. total shown in the National Performance Review 2017-18 by Water New Zealand).

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?

Disagree

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

We support the recommendation that, if the NPSREG is amended, stronger direction is provided on how to weigh renewable energy generation against potentially competing values under the RMA. This would need careful consideration to avoid creating an imbalance between the NPSREG and other national planning instruments.

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?

Respondent skipped this question

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

Any further direction should give clarity around whether all (e.g. regardless of scale), or which, renewable energy projects are to be considered nationally significant in order to achieve climate targets etc.

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

Respondent skipped this question

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?

Respondent skipped this question

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

Further consideration is needed regarding whether it should be the responsibility of Councils to identify potential areas, and no-go areas, for renewable energy resources. Councils are not typically resourced with this type of expertise. However, some of this identification work - particularly no-go areas - could occur as part of spatial planning for a region. Having these areas identified in a spatial plan as opposed to a regional or district plan may be more appropriate given the difficulties and time involved to make changes to district or regional plans.

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?

Respondent skipped this question

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

Respondent skipped this question

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

We agree that there may be benefits to having separate policies for nationally significant infrastructure and others for small-scale projects. For example, nationally significant projects could get stronger, more direct support in the NPSREG while acknowledging local and cumulative benefits of small-scale renewable projects.

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?

Respondent skipped this question

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?

Respondent skipped this question

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

The implications of amending the NPSREG or developing a new NES need to be carefully considered against the stated objectives of other existing NPS’s developed by Government and their interactions fully understood and intended. Ultimately, the suite of NPS’s need to be consistent and balanced - as identified on page 60 of the discussion document.

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?

Respondent skipped this question

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

Respondent skipped this question

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

Respondent skipped this question

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

Respondent skipped this question

Q95 What are the downsides and risks to developing NES?

Respondent skipped this question

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

Respondent skipped this question

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

Respondent skipped this question

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

Respondent skipped this question

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.	**Respondent skipped this question**
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?	**Respondent skipped this question**
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 ?	**Respondent skipped this question**
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)?	**Yes,** Please explain your answer: Within the Wellington region, the use of spatial planning is currently providing an opportunity for the region to think collectively about the long-term energy needs of the region, including demand and security of supply, in the context of our wider well-being goals, such as equitable access, resiliency of the region and environmental outcomes. The main purpose around current spatial planning is in the development of housing and supporting infrastructure requirements, of which energy is a key aspect. Our spatial planning exercise will identify the need for more (or different) energy requirements and also no-go areas within the region where no development (including renewable energy) should go. The identification of specific pieces or areas of land for renewable energy i.e. wind farms, would require a much more detailed analysis that will probably not be undertaken during this piece of work but could be developed from the spatial planning work.
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?	**Respondent skipped this question**

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

Respondent skipped this question

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

Respondent skipped this question

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	**Agree**
facilitate match-making	**Agree**
assume some financial risk	**Agree**

Q109 Would support for PPAs effectively encourage electrification?

Yes - support for PPAs would effectively encourage electrification

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

Yes - support for PPAs would effectively renewable generation investment

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

Ideally the deals brokered would be PPA plus some contingency hedges and recourse to the spot market, even if the latter is non-renewable.

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

Respondent skipped this question

Q113 What are your views on Contract Matching Services?

Respondent skipped this question

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

This would allow councils to leverage their long term investments in water infrastructure to directly support development of renewable energy generation. At the moment there are very limited options for purchase of certified 100% renewable energy.

Q115 What are your views on Government guaranteed contracts?

Respondent skipped this question

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

Respondent skipped this question

Q117 For manufacturers: what delivered electricity price do you require to electrify some or all of your process heat requirements?	**Respondent skipped this question**
Q118 For manufacturers: is a long-term electricity contract an attractive proposition if it delivers more affordable electricity?	**Respondent skipped this question**
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?	**Respondent skipped this question**
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?	**Respondent skipped this question**

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: Yes, this is a priority, but possibly lower priority than other government interventions. Demand response approaches can reduce demand for thermal generators and help address the intermittency problem of renewables. However, by itself it can't encourage electrification or more renewables.
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?

There are potential benefits to developing the demand response market. Demand Response reduces network peaks which helps the supply side, and provides revenue and other benefits to improve demand side resilience (e.g. regularly operating standby generators under load improves confidence the equipment will work in an emergency). There are also some issues with intermittency and electrification that may be addressed, but not inter-seasonal energy storage.

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

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

Uptake needs to be prompted. It could simply be mandatory for certain loads (e.g. EV chargers) to achieve greatest market penetration. Financial reward is also key but the impact on the consumer's carbon emissions from knocking out thermal generating plants has been overlooked. Ideally the consumers voluntarily participating in demand response should get some credit in their organisational carbon accounts for helping avoid use of thermal generators at the peak (i.e. they get to use a unique emissions factor). If demand response participation was mandatory then this wouldn't be necessary.

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

Heat pumps, heating swimming pools and AC EV charging. DC 'fast' EV charging rates (e.g. at public chargers) could also be moderated but not switched off.

Q127 Which services make sense for New Zealand? **Respondent skipped this question**

Page 19: Section 8 - continued

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

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

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

Insulation, LEDs, heat pumps

Q131 Should these be targeted at certain consumer groups?

There could be a different approaches for different groups, for example cheaper options for those on lower incomes.

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

Q133 Which entities would most effectively achieve energy savings?

Retailers would likely be more effective than distributors. However, they would need to focus on getting customers over the 'too good to be true' factor, which was an issue in the UK during their similar schemes that offered energy supplier subsidised home energy saving measures (EEC and CERT).

Q134 What are the likely compliance costs of this policy? **Respondent skipped this question**

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?

Respondent skipped this question

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

The major benefits would come from coupling offshore wind development with the production of hydrogen and/or ammonia for direct domestic use, export and inter-seasonal energy (electricity) storage, as otherwise the lack of diversity of such a large chunk of generation capacity coming online is likely to have adverse economic effects.

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

Respondent skipped this question

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

Respondent skipped this question

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?

Respondent skipped this question

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

Respondent skipped this question

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

Respondent skipped this question

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

Respondent skipped this question

Q143 Should RPS requirements apply to all electricity retailers?

Respondent skipped this question

Q144 Should RPS requirements apply to all major electricity users?

Yes,
Please explain your answer:
There are potential benefits to requirements applying to all energy users being subject to the requirement, including those not buying electricity through a retailer (thereby outsourcing the task of obtaining energy certificates to them).

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

Respondent skipped this question

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

Yes

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

Any built after a given date e.g. now. Perhaps the certificates could specify if they are from a ‘new’ or ‘legacy’ generation plant. ‘Legacy’ energy certificates would allow the holder to say they are supplied with renewable electricity, but perhaps should not be able to be used to claim they have lower carbon emissions than that calculated using the grid average (excluding the renewables classed as ‘new’).

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).

Respondent skipped this question

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).

Respondent skipped this question

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

Respondent skipped this question

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?

Respondent skipped this question

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

Respondent skipped this question

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

Support

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

Probably would

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

There should be trigger points for being allowed to operate, e.g. below a certain storage level or above a certain percentage of total available grid capacity used.

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?

Investment in energy storage (e.g. by government) and demand side management.

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).

It may be beneficial to perform a planned phase out of generation plants based on regulated emissions limits per kWh (excluding peaking plants and strategic reserve).

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?

Respondent skipped this question

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

Onshore wind energy (utility-scale turbines) can offer the best returns but solar is easier to implement.

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

- Bringing more renewable energy generation onstream

- Community dividends

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

- Community buy-in will not necessarily prevent objections/RMA appeals

- To be ‘community owned’ in practice means project needs to have its financial benefits spread equitably to local community, not just a few local investors. Assets need to be owned by councils, community trusts, possibly social enterprises, to do this.

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

Respondent skipped this question

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

Respondent skipped this question

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?	**Respondent skipped this question**
Q166 What do you see as the pros of a clear government position on community energy?	**Respondent skipped this question**
Q167 What do you see as the cons of a clear government position on community energy?	**Respondent skipped this question**
Q168 What do you see as the pros of government support for pilot community energy projects?	**Respondent skipped this question**
Q169 What do you see as the cons of government support for pilot community energy projects?	**Respondent skipped this question**
Q170 Are there any other options you can suggest that would support further development of community energy initiatives?	**Respondent skipped this question**

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.	**Respondent skipped this question**
Q172 What do you see as the disadvantages or risks of Option 10.1?	**Respondent skipped this question**
Q173 What do you see as the disadvantages or risks of Option 10.2?	**Respondent skipped this question**
Q174 What do you see as the disadvantages or risks of Option 10.3.1?	**Respondent skipped this question**
Q175 What do you see as the disadvantages or risks of Option 10.3.2?	**Respondent skipped this question**
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?	**Respondent skipped this question**
Q177 Are there any additional options that should be considered?	**Respondent skipped this question**

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?	**Respondent skipped this question**
Q179 Is there a role for Government to provide independent geospatial data (e.g. wind speeds for sites) to assist with information gaps?	**Respondent skipped this question**
Q180 Should MBIE's Electricity Demand and Generation Scenarios (EDGS) be updated more frequently?	**Respondent skipped this question**
Q181 If you said yes, how frequently should they be updated?	**Respondent skipped this question**
Q182 Should MBIE's EDGS provide more detail, for example, information at a regional level?	**Respondent skipped this question**
Q183 Should the costs to the Crown of preparing EDGS be recovered from Transpower, and therefore all electricity consumers (rather than tax-payers)?	**Respondent skipped this question**
Q184 Would you find a users' guide (on current regulation and approval process for getting an upgraded or new connection) helpful?	**Respondent skipped this question**
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?	**Respondent skipped this question**
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?	**Respondent skipped this question**
Q189 If so, who would be best to develop and maintain this?	**Respondent skipped this question**
Q190 How should it be funded?	**Respondent skipped this question**

Q191 Should measures be introduced to enable coordination regarding the placement of new wind farms?	**Respondent skipped this question**
Q192 Are there other information sharing options that could help address investment coordination issues? What are they?	**Respondent skipped this question**

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.	**Respondent skipped this question**
Q194 Are there any barriers that will not be addressed by current work programmes outlined on pages 118 - 122 of the discussion document?	**Respondent skipped this question**
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?	**Respondent skipped this question**
Q196 Are there other Section 10 information options that could be extended to include information about local networks and distributed generation?	**Respondent skipped this question**
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?	**Respondent skipped this question**
Q199 What changes, if any, to the current arrangements would ensure distribution networks are fit for purpose into the future?	**Respondent skipped this question**

Page 29: Additional comments

Q200 Do you have any additional feedback?

Greater Wellington Regional Council supports the ambitions of the discussion document to encourage energy efficiency and the uptake of renewable fuels in industry, and to accelerate renewable electricity generation and infrastructure. Achieving these goals will be critical to our success in delivering urgent greenhouse gas emissions reductions across Aotearoa, and aligns with the path that the council is on towards becoming a net zero emissions organisation by 2030.

We do, however, want to reemphasise points made under section 7 of this submission, that should the NPSREG be amended, there is a need to avoid creating an imbalance between the easing of restrictions to accelerate renewable electricity with the requirements of other national planning instruments. In particular an amended regulation must not result in perverse outcomes for the wider environment and must consider the objectives of the RMA reforms underway now, including those for freshwater and indigenous biodiversity management.

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

Respondent skipped this question