

#65

COMPLETE

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Page 1: Introduction

Q1 Name (first and last name)

Privacy of natural persons

Q2 Email

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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? **Consultant, financial services etc**

Q5 Business name or organisation (if applicable)

KSC International Ltd

Q6 Position title (if applicable)

Director

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?

All of New Zealand

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.

Respondent skipped this question

Q14 Part B relates to renewable electricity generation. Please indicate which sections, if any, you would like to provide feedback on.

Section 8: Supporting renewable electricity generation investment

Page 4: Section 1: Addressing information failures

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

Strongly agree

facilitate match-making

Neither disagree nor agree

assume some financial risk

Neither disagree nor 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?

Respondent skipped this question

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

Contract matching service

1

State-sector led

3

Government guaranteed contracts

4

Clearing house

2

Q113 What are your views on Contract Matching Services?

Respondent skipped this question

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

Respondent skipped this question

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?

Yes,
Please explain your answer:
It reduces risk substantially for investors and developers.

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?

Respondent skipped this question

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?

Respondent skipped this question

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?

Respondent skipped this question

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

Respondent skipped this question

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?

Respondent skipped this question

Q131 Should these be targeted at certain consumer groups?

Respondent skipped this question

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

Respondent skipped this question

Q133 Which entities would most effectively achieve energy savings?

Respondent skipped this question

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?

Strongly agree

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

Offshore wind could have the potential to make NZ energy independent contribute to make NZ a clean energy exporter while helping with Taranaki 2050 and the H2 Taranaki roadmap, mainly by utilizing and further develop existing expertise in the offshore construction/operation sector. If done properly it also could open up a pathway for the existing oil&gas industry to decarbonize its operations and involve it heavily into reaching your goals of carbon neutrality in 2050. In Europe, there are currently two developments underway which aim at decarbonizing refining operations with "green" hydrogen from offshore wind.

<https://www.rechargenews.com/transition/offshore-wind-to-power-giant-green-hydrogen-carbon-neutral-aviation-fuel-plant/2-1-696907>

<https://www.business-live.co.uk/economic-development/offshore-wind-power-hydrogen-production-17765917>

The wider socio-economic benefits are not easy to quantify.

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

Privacy of natural persons

#40

INCOMPLETE

Collector: Final submissions link (Web Link)
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Page 1: Introduction

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Respondent skipped this question

Page 2

Q11 Where are you located?

Respondent skipped this question

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All of New Zealand

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 3: Innovating and building capability

Q14 Part B relates to renewable electricity generation. Please indicate which sections, if any, you would like to provide feedback on.

Respondent skipped this question

Page 4: Section 1: Addressing information failures

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?

Agree,
Please explain your answer:
Since risk plays a vital role in FID's, especially if they have a long-term impact on the profitability and competitiveness of a business, a government focus on de-risking will help corporate decision-makers and investors to make faster decisions on implementing low emission technology.

Q48 Do you agree that diffusing commercially viable low-emission technology should be a focus of government support on process heat?

Neither agree nor disagree,
Please explain your answer:
Would say that diffusing commercially viable low-emissions should be left to industry and businesses. If the government provides the right regulatory policy framework for low-emission technology and helps to de-risk investment diffusion will happen organically.

Q49 Is Energy Efficiency and Conservation Authority (EECA) grant funding to support technology diffusion the best vehicle for this?

No

Q50 For manufacturers and energy service experts: would peer learning and lead to reducing perceived technology risks?

Yes

Q51 For manufacturers and energy service experts: would on-site technology demonstration visits lead to reducing perceived technology risks?

Yes

Q52 Is there a role for the Government in facilitating this?

No,

Please expand on your answer:

Would argue that it is best addressed by manufacturers and energy service experts.

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

#39

COMPLETE

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Respondent skipped this question

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Respondent skipped this question

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All of New Zealand

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 2: Developing markets for bioenergy and direct geothermal use

Q14 Part B relates to renewable electricity generation. Please indicate which sections, if any, you would like to provide feedback on.

Respondent skipped this question

Page 4: Section 1: Addressing information failures

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? **Neither agree nor disagree**

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? **Disagree,**
Please explain your answer:
In the end, the user's guide is only helping businesses to navigate the air quality and other technical planning rules rather than reducing regulatory barriers to the use of wood energy.

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?

Yes

Q42 What other options are worth considering?

Respondent skipped this question

Q43 Is Government best placed to provide market facilitation in bioenergy markets?

Yes

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

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)?

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?

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?

Respondent skipped this question

Q109 Would support for PPAs effectively encourage electrification?

Respondent skipped this question

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

Respondent skipped this question

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

Respondent skipped this question

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?

Respondent skipped this question

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?

Respondent skipped this question

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

Respondent skipped this question

Q123 What are the key features of demand response markets?

Respondent skipped this question

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?

Respondent skipped this question

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

Respondent skipped this question

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?

Respondent skipped this question

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?

Respondent skipped this question

Q131 Should these be targeted at certain consumer groups?

Respondent skipped this question

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

Q133 Which entities would most effectively achieve energy savings? **Respondent skipped this question**

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? **Respondent skipped this question**

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? **Respondent skipped this question**

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?

Respondent skipped this question

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

Respondent skipped this question

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?

Respondent skipped this question

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

Respondent skipped this question

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

Respondent skipped this question

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

Respondent skipped this question

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?

Respondent skipped this question

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).

Respondent skipped this question

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?

Respondent skipped this question

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

Respondent skipped this question

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

Respondent skipped this question

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?

Respondent skipped this question

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

Respondent skipped this question

#33

COMPLETE

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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? **Consultant, financial services etc**

Q5 Business name or organisation (if applicable)

KSC International Ltd

Q6 Position title (if applicable)

Director

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?

All of New Zealand

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 1: Addressing information failures

Q14 Part B relates to renewable electricity generation. Please indicate which sections, if any, you would like to provide feedback on.

Respondent skipped this question

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?

Yes - I fully support this option

Q16 Please explain your answer

It will ensure that companies with the highest impact on energy consumptions stay on top of the topic of the energy transition towards renewable energy and increase the efficiency of their existing operations. It also will make sure that other stakeholder, such as the general public, the community they operate in and shareholder especially from not NZX listed companies have access to the information and corporations can be held to account.

Q17 Which parts (set out in Table 3) do you support?

Target group - companies with an annual energy spend of greater than \$2 million per annum

,
Public reporting,

Government reporting,

Energy auditing,

Compliance

Q18 Please explain your answer

Do agree in general with the proposed requirements the question for me for public reporting would be, how specific the data would need to be on the plans to reduce emissions to avoid losing potential competitive advantage to competitors.

Q19 What public reporting requirements (listed in Table 3) should be disclosed?

Annual corporate-level energy use and emissions, split out by a range of sources including coal, gas, electricity and transport

,
Energy efficiency actions taken that year

Q20 In your view, should businesses be expected to include transport energy and emissions in these reporting requirements?

Yes,

Please explain your answer:

At least if transport energy makes up a huge part of their operations/spend on energy. Why would you exclude transport energy and emissions? Or do you want to create two mechanisms? Like one for large energy users only in process heat and one for large energy users in transportation? What data would you use to define "large energy user"? Only annual spend on electricity and process heat? Doesn't seem to make sense to me if the goal is net-zero at 2050

Q21 For manufacturers: what will be the impact on your business to comply with the requirements?

No impact,

Please provide specific cost estimates if possible:
Not a manufacturer.

Q22 Option 1.1. Suggests that requirements to publish Corporate Energy Transition Plans should apply to large energy users, and proposes 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? **No**

Q23 If you selected no, please describe what in your view would be an appropriate threshold to define 'large energy users'.

Since I do not know how you arrived at this threshold and with that it rather seems arbitrary to me I have to say no.

Would apply the Pareto principle/ 80/20 analysis to identify the appropriate threshold. Either on annual spend or preferably on energy consumed depending on which data are available.

Theoretical it would be possible that certain companies spend more money because they use cleaner technologies or less polluting solutions while others use more polluting ones which are way cheaper.

Let's say I have a PPA over 2,5 million for electricity from hydro or a wind farm for drying operations I have to report but if I would only pay 1,8 million because I run on old coal boilers and coal is cheap I do not have to report even though the amount of energy necessary would be more or less the same.

So I'm not sure if 2 million annual spends is making a lot of sense as a metric/threshold to determine a "large energy user".

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? **No**

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? **Yes**

Q26 Would an electrification information package be of use to your business? **No**

Q27 Do you support customised low-emission heating feasibility studies? **No**

Q28 In your view, which of the components should be scaled up and/or prioritised?

regularly publishing information on electricity reliability for large sites **Scaled up, Prioritised**

providing information about ways to increase reliability and resilience of electrically- supplied plant and systems **Prioritised**

Q29 Would a customised low-emission heating feasibility study be of use to your business? **No**

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? **Yes**

Q32 Would benchmarking be suited to, and useful for, other industries, such as wood processing? **No**

Q33 Do you believe government should have a role in facilitating this or should it entirely be led by industry? **Should be entirely led by industry**

Q34 Please explain your answer

The government should focus on CTP and Electrification information packages.

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**

#63

COMPLETE

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Section 6: Cost recovery mechanisms

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Page 4: Section 1: Addressing information failures

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Q38 What do you consider a NESAQ users' guide should cover? Please provide an explanation if possible. **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?

In general, I think it is a good idea to adopt cost recovery mechanisms to fund policy proposals in Part A. As long as they are aligned with the goal of increasing the uptake of renewable fuels.

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

Depending on the Levy rate it can provide additional incentive to switch to a low/zero-carbon solution. If you would make the levy progressive it might be an additional incentive for EHI industries to develop alternatives.

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

For industries with low-profit margins, it might cost them their competitive advantage or threaten their profitability entirely.

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?

Respondent skipped this question

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

Respondent skipped this question

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?

Respondent skipped this question

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?

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?

Respondent skipped this question

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

Respondent skipped this question