#85

COMPLETE

Collector: Final submissions link (Web Link)
Started: Friday, February 28, 2020 2:03:31 PM
Last Modified: Friday, February 28, 2020 4:43:15 PM
Time Spent: 02:39:43

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?

Industry and Industry Advocates

Q5 Business name or organisation (if applicable)

New Zealand Green Building Council

Q6 Position title (if applicable)

Respondent skipped this question

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,** **Section 3: Innovating and building capability,** **Section 4: Phasing out fossil fuels in process heat,** **Section 5: Boosting investment in renewable energy and energy efficiency technologies** **,** **Section 6: Cost recovery mechanisms**
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?	**I support this option in part**

Q16 Please explain your answer

NZGBC supports the requirement to report emissions and energy use annually, to publish Corporate Energy Transition Plans, and energy auditing. However, we don't think the requirements go far enough. These requirements should also apply to medium and smaller energy users. Measurement and reporting of emissions and energy use should be mandatory across the board and is essential if we're to increase efficiencies throughout New Zealand and reduce our emissions. Energy audits should be more regular, we would argue the audits should take place every one to two years. Given the timeline New Zealand has to slash emissions and meet its zero-carbon goals we believe it's essential to rapidly escalate our efficiency efforts. A four year audit period risks companies failing to act fast enough. We also would urge any Corporate Energy Transitions Plan requirements to also include a carbon reduction action plan to improve energy efficiency and phase out fossil fuels by 2025, with a goal for zero-carbon by 2030

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

Public reporting,

Government reporting,

Energy auditing,

Compliance

Q18 Please explain your answer

As outlined previous, NZGBC believes the target group should be expanded to include medium and smaller users of power. For a true, effective transition to a more efficient New Zealand, everyone needs to be involved.

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,

Plans to reduce emissions to 2030

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

Yes,

Please explain your answer:

For many companies, transport energy and emissions make up a key part of their footprint. Requiring reporting about their fleet, and measurement of their emissions would provide companies and the wider market with a better picture of efficiency improvements and emission reductions. Transparent reporting also provides accountability for those heavily reliant on fossil fuel powered vehicles, and an incentive to reduce that impact. Transport energy will also be a key metric in electricity performance as EVs and charging stations become more mainstream.

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?	**No**

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

NZGBC would like to see the threshold dropped and the description expanded to include medium and smaller users of power. We would like to see consideration of a threshold not entirely energy expense related. For example, companies who occupy a large 10,000m2 building with average performance would spend about $400k a year on energy, way less than the $2million. However they're still considerable users of power and would benefit from energy performance benchmarking.
BRANZ BEES study says there are about 500 commercial buildings across New Zealand that are larger than 9,000m2 (in 2014).

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?	**Yes**
Q27 Do you support customised low-emission heating feasibility studies?	**Yes**

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**
providing information about ways to increase reliability and resilience of electrically- supplied plant and systems	**Scaled up**
co-funding low-emission heating feasibility studies for EECA’s business partners	**Scaled up, Prioritised**

Q29 Would a customised low-emission heating feasibility study be of use to your business?	**Yes**
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?

Yes (please specify):
Benchmarking is important in setting meaningful standards and encouraging measurement. Unfortunately, measurement for energy use and efficiency isn't done widely. Establishing benchmarks across the board will help entrench conscious calculation and measurement and create a trajectory towards improvements. While NZGBC would like energy benchmarking made mandatory across the commercial sector, including those whose impact come primarily through their use of office buildings, in construction we would like benchmarks established for material manufacturing process for key products like steel, cement, and aluminum. In Appendix 1 of the consultation document the Government says it’s targeting four star NABERSNZ ratings for its buildings and leases. We support this move, and would like to see it rolled out wider with mandatory benchmarking required for the private sector. This has been successful in Australia over the last 20 years, helping stop 6 million tonnes of CO2 being emitted, saving $870 million in energy bills, saving enough energy to power 400,000 households. Regulation and benchmarking is on one of EECA's levers. It is not using this lever enough.

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

Government should have a role

Q34 Please explain your answer

As key authoritative regulators, Government has in important role in establishing and enforcing any standards and benchmarks. The Government's involvement lends authority to any benchmarking process and would help ensure they're treated seriously by the industry and aren't treated as a hollow aspiration. We believe the Government should help facilitate alongside industry with appropriate consultation and consideration of feedback. Government regulation is what worked in Australia, Europe, and many US jurisdictions. Energy labels on buildings will greatly assist to reduce demand and provide levers for other regulation

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?	**Agree,** Please explain your answer: As outlined in the Discussion Document, companies tend to be risk averse to technologies that will change their production process, however in EIHI industries like steel and cement emissions can only be reduced through changes in processes and investment in low emissions technologies. Given the likely scale and potential impact of these investments, we believe Government support to help de-risk the commercial viability should be a priority. This support should be through greater funding, including more funding sources (also funding opportunities and scope), as well as facilitating knowledge sharing and exposure to technological developments internationally. The Government should also lead by procuring lower carbon products themselves, helping to create demand.
Q48 Do you agree that diffusing commercially viable low-emission technology should be a focus of government support on process heat?	**Agree,** Please explain your answer: Given the scale and transformative change required, Government has an important role in ensuring low-emission technology can and will be adopted throughout Aotearoa. We support the idea of a diffusion and capability-building fund . Any steps that can reduce the barriers to market transformation should be considered and acted on promptly.
Q49 Is Energy Efficiency and Conservation Authority (EECA) grant funding to support technology diffusion the best vehicle for this?	**Yes**
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?	**Yes**

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?

We believe low-carbon roadmaps are an important transformative tool to signal and bring about change. In 2019 the zero-carbon roadmap for the built environment was launched to help the construction and property sectors, as well the as Government and regulators, start to ramp up efforts with direction and short to medium term goals to aim for. Roadmaps help identify key challenges and provides a pathway to creating and implementing solutions.

Q54 Would low-carbon roadmaps assist in identifying feasible technological pathways for decarbonisation?

Yes,
Please explain your answer:
Creating a low-carbon roadmap should involve a stock take of current processes and technologies, as well as a review of potential solutions. Through this process of review it is reasonable to assume feasible technological pathways will inevitably be identified. If none exist, then it also provides a signal to the wider market about what areas need more work and attention.

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?

Strongly agree

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?

Strongly agree

Q59 Referring to Question 56 - is this ambitious or is it not doing enough?

Not doing enough,
Please explain your answer:
Coal-fired boilers absolutely need to be banned for low and medium temperature requirements. It's an important step towards reducing our reliance on fossil fuels and our emissions. However, we would argue that coal-boilers, while big emitters, are only one part of a wider energy problem. We would like to see Government go further by including all fossil fuel. Around a third of the operational carbon emissions from New Zealand's buildings come from fossil fuels used for space and hot water heating. The majority of these emissions come from natural gas and LPG, both of which have seen steady rises in consumption in recent years. Coal use in buildings is on the decline. Overall, fossil fuel emissions in buildings are roughly equally split between homes and businesses. Commercial buildings are often heated with gas boilers in the North Island and a proportion of homes typically have instantaneous gas heating for hot water. If New Zealand is to achieve its net zero ambitions by 2050, these fossil fuel boilers will need to be replaced with low or zero carbon heat sources, such as heat pumps, wood stoves and woodfired boilers. The technologies to do this are readily available in most cases and doing so would save more than one million tonnes of CO 2 equivalent a year. We note that including natural gas and other fossil fuels is not a favoured option, as laid out in the Discussion Document, because of the cost to industry. This is disappointing and we urge the Government, given the acceptance that a net-zero 2050 will likely require the phase down of gas, to consider being ambitious. We are already seeing engineering consultants recommending and installing alternatives to fossil fuels in building work, including in major hospital developments, so we know it's possible and viable. Recent research has found that to emissions from fossil fuels, including natural gas, are 25-40% higher than previously thought
https://www.nytimes.com/2020/02/19/climate/methane-flaring-oil-emissions.html
https://www.biogeosciences.net/16/3033/2019/

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?

Yes,
Please explain your answer:
Establishing a plan for businesses to transition, and the requirement to measure and benchmark their emissions, will contribute to the phasing out of fossil fuels in process heat. Given the high emission associated with fossil fuels, transitioning away must form a key consideration in any transition plan with a focus on reducing emissions and increasing electrification.

Q63 Would a timetabled phase out of fossil fuels in process heat be necessary alongside the Corporate Energy Transition Plans?

Yes,
Please explain your answer:
This goes back to the importance of a roadmap. By timetabling the phase out of fossil fuels, industries get a clear indication of goals and transition time frames. We believe a timetabled phase out is essential alongside the Corporate Energy Transition Plans. It helps spur on action, and ensure transition plans have tangible, transformative goals.

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?

Yes,
Please explain your answer:
There are key ways in which energy efficiency and renewables can be adopted under the Building Code, as well as through EECA regulation. The Building Code is notably silent on space heating, water and domestic lighting, meaning a large proportion of the energy used in our buildings goes unregulated. There are no minimum efficiency requirements for space heating and what sort of systems can be used. You can put in tremendously inefficient heaters to warm your home when an efficient heat pump would use three times less electricity. There's nothing to preclude installing big, inefficient emitters like gas heaters or coal boilers for example. Minimum energy performance standards are in place under the Energy Efficiency (Energy Using Products) Regulations 2002. However, these are limited in scope, and should be expanded. We would also like these minimum energy performance standards to be incrementally increased to ensure older, less efficient systems are phased out.

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?	**both**
Q69 In your view what is a bigger barrier to investment in clean energy technologies, internal competition for capital or access to capital?	**Respondent skipped this question**
Q70 If you favour financial support, what sort of incentives could be considered?	**Respondent skipped this question**
Q71 What are the benefits of these incentives?	**Respondent skipped this question**
Q72 What are the risks of these incentives?	**Respondent skipped this question**
Q73 What are the costs of these incentives?	**Respondent skipped this question**

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

The Government can build significantly above Building Code when they construct buildings. This sends a clear signal to market.
Reduce developer contributions for low carbon buildings. Even a 10 or 20% difference would have huge impacts.
Require energy ratings on all houses and buildings at point of sale

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?

We support the the implementation of cost recovery mechanisms to fund the proposals

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

Clearly a levy will increase the cost of using coal for process heat activities, helping speed up the transition to cleaner alternatives. It makes these alternatives more viable. Also the costs recovered from the levy can be used to help a just transition and to fund the proposals outlined in this policy proposal.

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

It will come at a cost to those reliant on coal and involved in its supply chain. This is why it will be important to work through a phase out with a clear roadmap and transition plan.

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**
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?	**Respondent skipped this question**
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?	**Respondent skipped this question**

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)?	**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**