

Reply form

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Organisation:	EnviroNZ Limited
Please identify your sector:	Waste
What are your views on the objective of this proposal? Do you agree or disagree with it? Why?	EnviroNZ supports the levy funding of a wider range of activities that encourage, promote and support energy efficiency, energy conservation and the use of renewable sources of energy.
What do you think is the appropriate balance between 'administrative simplicity/transparency' and the 'causer or beneficiary pays' and 'rationality' criteria? Should more weight be given to one over the others?	
Which option do you think provides the best balance?	
What is your preferred option?	Option 3A Existing electricity levy with expanded purpose + PEFML with expanded purpose + gas levy with expanded purpose – set allocations.
Why do you consider this the best option?	It will create a larger funding pool and meet EECA objectives of - energy efficiency, energy conservation and the use of renewable sources of energy - so that the levy funding can be used for the full range of EECA's activities.
Of the options you do not prefer, what issues or reasons do you think are most important for us to consider?	1B A levy on MW produced by existing renewable or biofuel generators is counter intuitive and counterproductive if the intention is to increase generation from these sources. Small scale distributed generation plants, using renewable or biofuel, are facing increasing financial pressures with reduction in wholesale electricity prices, proposed Electricity Commission reforms that are likely to result in increased connection costs and reduced or the elimination ACOT payments. The likely outcome of these added financial burdens is a reduction in new investment and possible closure of current installations.

	<p>2A Whilst an exemption for the production of Biofuels and Ethanol exists, new technology now allows for the production of liquid fuels from non-traditional sources such as waste to fuel (Petrol, Diesel Jet fuel) and upgrading of Landfill gas to CNG or liquid fuel.</p> <p>These are multi-million dollar technology investments with significant benefits to the country in offsetting our reliance on traditional fossil fuel imports. As a result they should be exempt from any levy in order to assist and encourage investment.</p>
<p>Are there other options for providing transparency in the use of levy money (besides requiring annual consultation and reporting)?</p>	