



6 August 2024

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Ministry of Business, Innovation & Employment
By Email: gasfuelpolicy@mbie.govt.nz

Feedback: Proposed Regulatory Regime for Carbon Capture, Utilisation and Storage

1. Introduction

- 1.1 This submission has been prepared by Ngāwhā Generation Limited (NGL) in response to the Proposed Regulatory Regime for Carbon Capture, Utilisation and Storage – June 2024
- 1.2 NGL is an independent Generator that is 100% owned by Top Energy Limited. Top Energy Limited is 100% owned by Top Energy Consumer Trust, which holds all the shares on behalf of Far North power consumers connected to Top Energy's lines network.

2. Question 15: Should liability be the same for all storage sites if projects are approved? Or should liability differ, depending on the geological features and characteristics of an individual storage formation?

- 2.1 NGL believe that geothermal should be excluded for the Carbon Capture and Storage (CCS) policy framework, Non-Condensable Gas ReInjection (NCGR) with naturally occurring CO₂ from the reservoir is not CCS and should not be associated with CCS.

Yours sincerely

Paul Doherty
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