

To: [energymarkets@mbie.govt.nz](mailto:energymarkets@mbie.govt.nz)

Thank you for the opportunity to provide officer feedback to the technical paper “Process Heat in New Zealand – Opportunities and Barriers to Lowering Emissions” recently released by the Ministry of Business, Innovation and Employment (MBIE) and the Energy Efficiency and Conservation Authority (EECA).

It is unclear from the technical paper who is being consulted on this matter. While Nelson City Council (NCC) is a large business in Nelson it is recommended that other large industrial businesses are consulted on this matter directly. It is also important that District Health Boards are engaged with to help quantify the potential health impacts associated with relying on non-renewable sources of energy.

The majority of NCC energy needs are currently met through electricity supply although some energy is drawn from diesel combustion:

**NCC emissions annual total 2017-2018** (*figure excludes Community housing, rental properties, public transport & CCOs*)

	<b>Electricity - approximate</b>	<b>Stationary diesel combustion</b>
<b>Energy use</b>	11574372.8 kwh	55206.4 litres
<b>tCO<sub>2</sub>e (Tonnes of carbon equivalent)</b>	1383 tCO <sub>2</sub> e	150 tCO <sub>2</sub> e

NCC has emergency diesel generators that will be used should electricity failure impact on critical Council functions such as in civil defence emergencies.

NCC has recently taken out membership with the Enviromark Certified Emissions Measurement and Reduction Scheme (CEMARS) in order to measure and reduce its operational greenhouse gas footprint. Work is currently underway to identify and record greenhouse gas emissions. An initial audit is scheduled for April 2019. As well as being audited for emissions, NCC will identify and report on how emissions will be reduced, including through relying on alternative uses of fuel. Once this work has been completed NCC is happy to supply this information to help inform MBIE and EECA’s advice to Ministers regarding process heat.

Paragraph 61 of the technical paper indicates that “energy efficiency investments may also yield hidden benefits such as increased productivity, health and safety, staff wellbeing and product quality” Health and safety benefits appear to be narrowly focused and should include public health benefits. Work undertaken by District Health Boards nationally has identified significant benefits to community health by reducing PM10 emissions generated from non-renewable energy sources.

Question 18 “Are there any costs or co-benefits of electrification that we have not included that your organisation has identified?”

Benefits should include public health benefits and costs should factor in the need to rely on non-renewable sources of energy in the event of electricity failure.

Regards – Matt Heale

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