

Form 3
**Submission on proposal for national policy statement for
renewable electricity generation**

In accordance with section 49 of the Resource Management Act 1991

To the Chairperson
Board of Inquiry

This is a submission on the proposed national policy statement for renewable electricity generation (the proposal) that was publicly notified on 6 September 2008.

The specific provisions of the proposal that my submission relates to are:

Objective
Policy 1
Policy 2
Policy 5
Other – review timeframe

My submission is:

Objective

Powerco supports the Proposed Objective subject to removing the reference to the 90 per cent target, as inclusion of the target may blur the boundaries between the role of the Environment Court, the Electricity Commission and the electricity market.

Policy 1

Powerco supports Policy 1 subject to the following amendment (amendment underlined). Policy 1(ii) be reworded to read:

contributing to security of electricity supply at local, regional and national levels by diversifying the type and/or location of electricity generation.

This presents a more accurate assessment of the role of renewable electricity generation as because of its often intermittent nature renewable generation will not always maintain or increase security of electricity supply.

Policy 2

Powerco supports Policy 2 but would like to see the Policy extended to recognise the role of new electricity distribution assets. This would provide new electricity distribution assets with a degree of regulatory support in the same way the National Policy Statement on Electricity Transmission supports the national grid (defined as Transpower's assets).

Policy 5

Powerco supports Policy 5 but would like to see the role of electricity distribution networks specifically recognised.

Other – Review timeframe

Powerco submits that it would be logical to include a provision for review of the National Policy Statement on Renewable Electricity Generation in line with timeframe of the restriction on fossil-fuelled thermal generation included in Part 6A Electricity Act 1992.

I seek the following changes to the proposal:

Objective

The following words should be deleted from the objective:

such that 90 per cent of New Zealand's electricity will be generated from renewable sources by 2025 (based on delivered electricity in an average hydrological year)

Policy 1

Policy 1(ii) be reworded to read:

contributing to security of electricity supply at local, regional and national levels by diversifying the type and/or location of electricity generation.

Policy 2

Policy 2 include the following new clause:

v. *the location of new electricity distribution assets.*

Policy 5

Policy 5 be amended to read:

By March 2012, local authorities are to notify in accordance with Schedule 1 of the Act, a plan change, proposed plan or variation to introduce objectives, policies and, where appropriate, methods, into policy statements and plans to enable activities associated with the development and operation of small and community-scale distributed renewable electricity generation including the extension or upgrading of electricity distribution networks.

I wish to be heard in support of my submission.

* If others make a similar submission, I will consider presenting a joint case with them at a hearing.

CMBS pp Karen Frew

Signature of submitter (or person authorised to sign on behalf of submitter)

31 October 2008

Date

(A signature is not required if you make your submission by electronic means.)

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