

Form 3  
Submission on proposal for national policy statement or  
New Zealand coastal policy statement

*Sections 49 and 57, Resource Management Act 1991*

To the Chairperson  
Board of Inquiry

This is a submission on the following proposed national policy statement:

Proposed National Policy Statement for Renewable Electricity Generation that was publicly notified on 6 September 2008

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

- The objective
- Policy 1 – Recognising the national significance of the benefits of renewable electricity generation activities
- Policy 2 – Acknowledging the practical constraints associated with the development, upgrading, maintenance and operation of the new and existing renewable electricity generation activities
- Policy 3 – having regard to the relative reversibility of adverse effects associated with particular generation types
- Policy 5 - Supporting small scale and community scale renewable electricity possibilities

My submission is:

In principle, Northpower Ltd supports the intention of the proposed national policy statement. The electricity industry will benefit from increased certainty and a more consistent approach to decision making provided by the statement and the clear preference placed on renewable electricity generation. It also provides further detail required to support section 7(j) of the Resource Management Act 1991

Modern society is dependant on electricity to maintain way of life. Although this document sets a clear preference for renewable generation, it does not place a strong focus on energy distribution and delivery. The two activities go hand in hand and must both be strongly supported to ensure continued secure energy supplies to New Zealand consumers.

To further promote achievement of the objective **Northpower Ltd requests amendments** and further consideration be given to issues as outlined in this submission.

I seek the following changes to the proposal:

**The objective**

This objective, although commendable was unclear about exactly how much generation is required. Electricity delivered by hydrological generation is dependant on factors which are often constrained. 90% is too broad a definition, it creates uncertainty regarding just how much generation is required.

Northpower recommends that the target be redefined for this document and expressed in terms of demand. A target expressed in terms of required demand will better assist development of generation to meet actual needs.

**Policy 1 – Recognising the national significance of the benefits of renewable electricity generation activities**

In principle Northpower agrees with this policy. The list of benefits could (and should) be expanded. New Zealand's commitment to environmental protection and commitment to support and protect international initiatives could be included in this policy.

**Policy 2 – Acknowledging the practical constraints associated with the development, upgrading, maintenance and operation of the new and existing renewable electricity generation activities**

It is good that practical constraints have been considered and acknowledged. However a strategic requirement should be introduced to ensure relevant authorities communicate and consider related applications together.

To ensure that supporting systems are able to promote renewable generation, planning and decisions may be required between territorial authorities or between different sectors of the electricity business.

Northpower recommends provision of further guidance regarding how this strategic planning should occur. Processing of applications of this nature at a Regional level provide some benefit.

**Policy 3 – having regard to the relative reversibility of adverse effects associated with particular generation types**

Northpower agrees that reversibility and impact on the environment should be considered. However, reversibility is not well defined and could lead to uncertainty amongst applications which are less reversible than others. Without concept definition and further guidance on how to apply this policy, inconsistent decision making between renewable generation types could result and prevent some projects proceeding. Northpower respectfully requests that this policy be reviewed to define reversibility to further support consistency between decisions.

**Policy 5 - Supporting small scale and community scale renewable electricity possibilities**

If renewable electricity generation is a formal priority for New Zealand, then all scales and all initiatives should be encouraged. Current wording of the policy may limit this. If a community initiative can support more than 4 megawatts of generation this should not be discouraged by national policy.

This policy would better support renewable electricity generation by eliminating limitations on size, scale and ownership. Local authorities would then be required to enable all activities associated with development of renewable electricity generation provided adverse effects are properly considered then avoided, remedied or mitigated.

If the small and community scale distributed renewable energy requirement electricity generation consideration is retained in this policy then the definition should be consistent with other legislation, rules and requirements.

Northpower Ltd does not wish to be heard in support of this submission. However, if clarification is required or if further information is required Northpower Ltd will assist in any practicable way.

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

.....  
Date

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

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