

## **Submission**

**By the: Northland Regional Council**

**On**

**Proposed National Policy Statement for Renewable Electricity  
Generation**

**To: Board of Enquiry**

1. The Northland Regional Council (Council) thanks the Board of Enquiry for the opportunity to make a submission on the Proposed National Policy Statement for Renewable Electricity Generation (NPS-REG).
2. The Council supports the development of renewable electricity generation but not for the same purpose as identified in the NPS-REG. The Council considers that the NPS-REG is inappropriately focused on a 90% renewable target when the focus should be clearly providing for sustainable community and regional scale development.
3. The NPS-REG should be part of a broader approach focusing on reducing energy use, adopting more efficient technology, co-generation initiatives and reducing economic barriers. This should be reflected in the pre-amble and the objective.
4. The benefits of 'significant' generation that inputs to the national grid and contributes significantly to the national demand for electricity is supported as a matter of national significance. The benefits of individual household scale electricity generation are not, in the Council's opinion, matters of national significance.
5. If the intention of Policy 4 and Policy 5 is to enable activities associated with the identification and investigation into commercial sites and the development and operation of small and community scale generation, then the NPS-REG should clearly state how this is to occur and identify policies to make it happen. There is no national direction in simply passing this task directly to local authorities.

6. The Northland Region currently has two generation facilities, the Ngawha Geothermal plant which is 25MW and the Wairua River Hydro-Electric plant which is 5MW. In the council's opinion, the definition of small and community scale distributed renewable electricity generation should not include a MW limit. The focus should be on whether the project provides community scale generation as opposed to a significant contribution to the national demand.
  
7. The Northland Regional Council wishes to be heard in support of this submission.



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