## #79

## COMPLETE

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Page 1	1:	Intr	od	uci	tion
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Q1 Name (first and last name)

Privacy of natural persons

Q2 Email

Privacy of natural persons

**Q3** Is this an individual submission, or is it on behalf of a group or organisation?

Individual

**Q4** Which group do you most identify with, or are representing?

Other (please specify): Horticulture - Controlled Environment Greenhouse operator

**Q5** Business name or organisation (if applicable)

Privacy of natural persons

Q6 Position title (if applicable)

Manager

**Q7** Important information about your submission Yes (important to read)The information provided in submissions will be used to inform the Ministry of Business, Innovation and Employment's (MBIE's) work on Accelerating renewable energy and energy efficiency. We will upload the submissions we receive and publish them on our website. If your submission contains any sensitive information that you do not want published, please indicate this in your submission. The Privacy Act 1993 applies to submissions. Any personal information you supply to MBIE in the course of making a submission will only be known by the team working on the Accelerating renewable energy and energy efficiency. Submissions may be requested under the Official Information Act 1982. Submissions provided in confidence can usually be withheld. MBIE will consult with submitters when responding to requests under the Official Information Act 1982. We intend to upload submissions to our website at www.mbie.govt.nz. Can we include your submission on the website? **Q8** Can we include your name? No **O9** Can we include your organisation (if submitting on No behalf of an organisation)? Q10 All other personal information will not be Respondent skipped this question proactively released, although it may need to be released if required under the Official Information Act. Please indicate if there is any other information you would like withheld. Page 2 Q11 Where are you located? Canterbury / Waitaha **Q12** In what region or regions does your organisation Respondent skipped this question mostly operate? Page 3: Areas you wish to provide feedback on **O13** Part A relates to process heat. Please indicate Section 4: Phasing out fossil fuels in process heat which sections, if any, you would like to provide feedback on. **Q14** Part B relates to renewable electricity generation. Respondent skipped this question

Page 4: Section 1: Addressing information failures

Please indicate which sections, if any, you would like to

provide feedback on.

<b>Q15</b> Option 1.1 would require large energy users to report their emissions and energy use annually, publish Corporate Energy Transitions Plans and conduct energy audits every four years.Do you support this option?	Respondent skipped this question
Q16 Please explain your answer	Respondent skipped this question
Q17 Which parts (set out in Table 3) do you support?	Respondent skipped this question
Q18 Please explain your answer	Respondent skipped this question
<b>Q19</b> What public reporting requirements (listed in Table 3) should be disclosed?	Respondent skipped this question
<b>Q20</b> In your view, should businesses be expected to include transport energy and emissions in these reporting requirements?	Respondent skipped this question
<b>Q21</b> For manufacturers: what will be the impact on your business to comply with the requirements?	Respondent skipped this question
Q22 Option 1.1. Suggests that requirements to publish Corporate Energy Transition Plans should apply to large energy users, and propses defining large energy users as those with an annual energy spend (purchased) of greater than \$2 million per annum.Do you agree with this definition?	Respondent skipped this question
<b>Q23</b> If you selected no, please describe what in your view would be an appropriate threshold to define 'large energy users'.	Respondent skipped this question
<b>Q24</b> Is there any potential for unnecessary duplication under these proposals and the disclosures proposed in the MBIE-Ministry for the Environment discussion document Climate-related Financial Disclosures – Understanding your business risks and opportunities related to climate change, October 2019?	Respondent skipped this question
Page 5: Section 1 - Option 1.2: Electrification information	tion package and feasibility studies
<b>Q25</b> Do you support the proposal to develop an electrification information package?	Respondent skipped this question
<b>Q26</b> Would an electrification information package be of use to your business?	Respondent skipped this question

<b>Q27</b> Do you support customised low-emission heating feasibility studies?	Respondent skipped this question
<b>Q28</b> In your view, which of the components should be scaled up and/or prioritised?	Respondent skipped this question
<b>Q29</b> Would a customised low-emission heating feasibility study be of use to your business?	Respondent skipped this question
Q30 Please describe any components other than those identified that could be included in an information package.	Respondent skipped this question
Page 6: Section 1 - Option 1.3: Provide benchmarking	information for food processing industries
Q31 Do you support benchmarking in the food processing sector?	Respondent skipped this question
Q32 Would benchmarking be suited to, and useful for, other industries, such as wood processing?	Respondent skipped this question
Q33 Do you believe government should have a role in facilitating this or should it entirely be led by industry?	Respondent skipped this question
Q34 Please explain your answer	Respondent skipped this question
Page 7: Section 2: Developing markets for bioenergy	and direct geothermal use
Q35 Do you agree that some councils have regional air quality rules that are barriers to wood energy?	Respondent skipped this question
Q36 Please provide examples of regional air quality rules that you see as barriers to wood energy. Please also note which council's plan you are referring to.	Respondent skipped this question
Q37 Do you agree that a National Environmental Standards for Air Quality (NESAQ) users' guide on the development and operation of the wood energy facilities will help to reduce regulatory barriers to the use of wood energy for process heat?	Respondent skipped this question
Q38 What do you consider a NESAQ users' guide should cover? Please provide an explanation if possible.	Respondent skipped this question

Q39 Please describe any other options that you consider would be more effective at reducing regulatory barriers to the use of wood energy for process heat.	Respondent skipped this question
<b>Q40</b> In your opinion, what technical rules relating to wood energy would be better addressed through the NESAQ than through the proposed users' guide (option 2.1)?	Respondent skipped this question
Page 8: Section 2 - continued: Developing markets fo	r bioenergy and direct geothermal use
<b>Q41</b> In your view, could the Industry Transformation Plans stimulate sufficient supply and demand for bioenergy to achieve desired outcomes?	Respondent skipped this question
Q42 What other options are worth considering?	Respondent skipped this question
<b>Q43</b> Is Government best placed to provide market facilitation in bioenergy markets?	Respondent skipped this question
<b>Q44</b> How could Government best facilitate bioenergy markets?Please be as specific as possible, giving examples.	Respondent skipped this question
Q45 In your view, how can government best support direct use of geothermal heat?	Respondent skipped this question
Q46 What other options are worth considering?	Respondent skipped this question
Page 9: Section 3: Innovating and building capability	
<b>Q47</b> Do you agree that de-risking commercially viable low-emission technology should be a focus of government support on process heat?	Respondent skipped this question
<b>Q48</b> Do you agree that diffusing commercially viable low-emission technology should be a focus of government support on process heat?	Respondent skipped this question
<b>Q49</b> Is Energy Efficiency and Conservation Authority (EECA) grant funding to support technology diffusion the best vehicle for this?	Respondent skipped this question
<b>Q50</b> For manufacturers and energy service experts: would peer learning and lead to reducing perceived technology risks?	Respondent skipped this question

Q51 For manufacturers and energy service experts: Respondent skipped this question would on-site technology demonstration visits lead to reducing perceived technology risks? **Q52** Is there a role for the Government in facilitating Respondent skipped this question this? Page 10: Section 3 (continued): Innovating and building capability Q53 For emissions-intensive and highly integrated Respondent skipped this question (EIHI) stakeholders: What are your views on our proposal to collaborate to develop low-carbon roadmaps? Q54 Would low-carbon roadmaps assist in identifying Respondent skipped this question feasible technological pathways for decarbonisation? Q55 What are the most important issues that would Respondent skipped this question benefit from a partnership and co-design approach? Q56 What, in your view, is the scale of resourcing Respondent skipped this question required to make this initiative successful? Page 11: Section 4: Phasing out fossil fuels in process heat Q57 Do you agree with the proposal to ban new coal-Strongly disagree fired boilers for low and medium temperature requirements? Q58 Do you agree with the proposal to require existing Strongly disagree coal-fired process heat equipment for end-use temperature requirements below 100 degrees Celsius to be phased out by 2030? Q59 Referring to Question 56 - is this ambitious or is it Ambitious. not doing enough? Please explain your answer: If this question refers to Question 58, then I believe it is an

If this question refers to Question 58, then I believe it is an unfair proposal. It unfairly disadvantages South Island energy users where coal is the most abundant and economical from of energy. There is currently no gas alternative in the south island. It would make obsolete the coal fired heating plant and cause substantial loss for the investment in this plant where businesses were calculating a useful life of up to 40 years. It will also seriously effect the economies of mining areas such as the West Coast.

**Q60** For manufacturers: what would be the likely impacts or compliance costs on your business of a ban on new coal-fired process heat equipment?

For South Island based Manufacturers and producers, It will limit the business opportunities, and cause them to re-asses the viability of their location for further growth. Options could include closing down, importing the products, relocation to the North Island, or relocating offshore.

**Q61** For manufacturers: what would be the likely impacts or compliance costs on your business of requiring existing coal-fired process heat equipment supplying end-use temperature requirements below 100°C to be phased out by 2030.

For south Island based manufacturers it would add substantial costs and cause them to reconsider the economics of their location. Changing process heating equipment would require substantial additional unexpected investment. Obsolete coal heating equipment would become valueless.

<b>Q62</b> Could the Corporate Energy Transition Plans (Option 1.1) help to design a more informed phase out of fossil fuels in process heat?	Respondent skipped this question
<b>Q63</b> Would a timetabled phase out of fossil fuels in process heat be necessary alongside the Corporate Energy Transition Plans?	Respondent skipped this question
Q64 In your view, could national direction under the Resource Management Act (RMA) be an effective tool to support clean and low greenhouse gas-emitting methods of industrial production?	Respondent skipped this question
Q65 If yes, how?	Respondent skipped this question
<b>Q66</b> In your view, could adoption of best available technologies be introduced via a mechanism other than the RMA?	Yes, Please explain your answer: By assisting, providing and encouraging alternatives rather than banning and outlawing current good energy sources.

Page 12: Section 5: Boosting investment in energy efficiency and renewable energy technologies

<b>Q67</b> Do you agree that complementary measures to the New Zealand Emissions Trading Scheme (NZ-ETS) should be considered to accelerate the uptake of cost-effective clean energy projects?	Respondent skipped this question
<b>Q68</b> Would you favour regulation, financial incentives or both?	Respondent skipped this question

**Q69** In your view what is a bigger barrier to investment in clean energy technologies, internal competition for capital or access to capital?

Respondent skipped this question

<b>Q70</b> If you favour financial support, what sort of incentives could be considered?	Respondent skipped this question
Q71 What are the benefits of these incentives?	Respondent skipped this question
Q72 What are the risks of these incentives?	Respondent skipped this question
Q73 What are the costs of these incentives?	Respondent skipped this question
<b>Q74</b> What measures other than those identified above could be effective at accelerating investment in clean energy technologies?	Respondent skipped this question
Page 13: Section 6: Cost recovery mechanisms	
Q75 What is your view on whether cost recovery mechanisms should be adopted to fund policy proposals in Part A of the Accelerating renewable energy and energy efficiency discussion document?	Respondent skipped this question
Q76 What are the advantages of introducing a levy on consumers of coal to fund process heat activities?	Respondent skipped this question
Q77 What are the disadvantages of introducing a levy on consumers of coal to fund process heat activities?	Respondent skipped this question
Page 14: Section 7: Enabling development of renewa	ble energy under the Resource Management Act
<b>Q78</b> Do you agree that the current NPSREG gives sufficient weight and direction to the importance of renewable energy?	Respondent skipped this question
<b>Q79</b> What changes to the NPSREG would facilitate future development of renewable energy?	Respondent skipped this question
<b>Q80</b> What policies could be introduced or amended to provide sufficient direction to councils regarding the matters listed in points a-i mentioned on pages 60-61 of the discussion document?	Respondent skipped this question
<b>Q81</b> How should the NPSREG address the balancing of local environmental effects and the national benefits of renewable energy development in RMA decisions?	Respondent skipped this question

<b>Q82</b> What are your views on the interaction and relative priority of the NPSREG with other existing or pending national direction instruments?	Respondent skipped this question
<b>Q83</b> Do you have any suggestions for how changes to the NPSREG could help achieve the right balance between renewable energy development and environmental outcomes?	Respondent skipped this question
<b>Q84</b> What objectives or policies could be included in the NPSREG regarding councils' role in locating and planning strategically for renewable energy resources?	Respondent skipped this question
<b>Q85</b> Can you identify any particular consenting barriers to development of other types of renewable energy than REG, such as green hydrogen, bioenergy and waste-to-energy facilities?	Respondent skipped this question
<b>Q86</b> Can any specific policies be included in a national policy statement to address these barriers?	Respondent skipped this question
<b>Q87</b> What specific policies could be included in the NPSREG for small-scale renewable energy projects?	Respondent skipped this question
<b>Q88</b> The NPSREG currently does not provide any definition or threshold for "small and community-scale renewable electricity generation activities". Do you have any view on the definition or threshold for these activities?	Respondent skipped this question
<b>Q89</b> What specific policies could be included to facilitate re-consenting consented but unbuilt wind farms, where consent variations are needed to allow the use of the latest technology?	Respondent skipped this question
<b>Q90</b> Are there any downsides or risks to amending the NPSREG?	Respondent skipped this question
Page 15: Section 7 - continued	
<b>Q91</b> Do you agree that National Environmental Standards (NES) would be an effective and appropriate tool to accelerate the development of new renewables and streamline re-consenting?	Respondent skipped this question
<b>Q92</b> What are the pros of using National Environmental Standards as a tool to accelerate the development of new renewables and streamline re-consenting?	Respondent skipped this question

<b>Q93</b> What are the cons of using National Environmental Standards as a tool to accelerate the development of new renewables and streamline re-consenting?	Respondent skipped this question
<b>Q94</b> What do you see as the relative merits and priorities of changes to the NPSREG compared with work on NES?	Respondent skipped this question
<b>Q95</b> What are the downsides and risks to developing NES?	Respondent skipped this question
<b>Q96</b> What renewables activities (including both REG activities and other types of renewable energy) would best be suited to NES?	Respondent skipped this question
<b>Q97</b> What technical issues could best be dealt with under a standardised national approach?	Respondent skipped this question
<b>Q98</b> Would it be practical for NES to set different types of activity status for activities with certain effects, for consenting or re-consenting?	Respondent skipped this question
<b>Q99</b> Are there any aspects of renewable activities that would have low environmental effects and would be suitable for having the status of permitted or controlled activities under the RMA? Please provide details.	Respondent skipped this question
<b>Q100</b> Do you have any suggestions for what rules or standards could be included in NES or National Planning Standards to help achieve the right balance between renewable energy development and environmental outcomes?	Respondent skipped this question
<b>Q101</b> Compared to the NPSREG or National Environment Standards, would National Planning Standards or any other RMA tools be more suitable for providing councils with national direction on renewables?	Respondent skipped this question
Q102 Please explain your answer	Respondent skipped this question
Page 16: Section 7 - continued	
<b>Q103</b> Are there opportunities for non-statutory spatial planning techniques to help identify suitable areas for renewables development (or no go areas)?	Respondent skipped this question

Respondent skipped this question
Respondent skipped this question
Respondent skipped this question
Respondent skipped this question
generation investment
Respondent skipped this question

<b>Q117</b> For manufacturers: what delivered electricity price do you require to electrify some or all of your process heat requirements?	Respondent skipped this question
<b>Q118</b> For manufacturers: is a long-term electricity contract an attractive proposition if it delivers more affordable electricity?	Respondent skipped this question
<b>Q119</b> For investors / developers: what contract length and price do you require to make a return on an investment in new renewable electricity generation capacity?	Respondent skipped this question
Q120 For investors / developers: is a long-term electricity contract an attractive proposition if it delivers a predictable stream of revenues and a reasonable return on investment?	Respondent skipped this question
Page 18: Section 8 - continued	
<b>Q121</b> Do you consider the development of the demand response (DR) market to be a priority for the energy sector?	Respondent skipped this question
<b>Q122</b> Do you think that demand response (DR) could help to manage existing or potential electricity sector issues?	Respondent skipped this question
Q123 What are the key features of demand response markets?	Respondent skipped this question
<b>Q124</b> Which features of a demand response market would enable load reduction or asset use optimisation across the energy system?	Respondent skipped this question
<b>Q125</b> Which features of a demand response market would enable the uptake of distributed energy resources?	Respondent skipped this question
Q126 What types of demand response services should be enabled as a priority?	Respondent skipped this question
Q127 Which services make sense for New Zealand?	Respondent skipped this question

Page 19: Section 8 - continued

<b>Q128</b> Would energy efficiency obligations effectively deliver increased investment in energy efficient technologies across the economy?	Respondent skipped this question
Q129 Is there an alternative policy option that could deliver on this aim more effectively?	Respondent skipped this question
<b>Q130</b> If progressed, what types of energy efficiency measures and technologies should be considered in order to meet retailer/distributor obligations?	Respondent skipped this question
Q131 Should these be targeted at certain consumer groups?	Respondent skipped this question
<b>Q132</b> Do you support the proposal to require electricity retailers and/or distributors to meet energy efficiency targets?	Respondent skipped this question
Q133 Which entities would most effectively achieve energy savings?	Respondent skipped this question
Q134 What are the likely compliance costs of this policy?	Respondent skipped this question
Page 20: Section 8 - continued	
<b>Q135</b> Do you agree that the development of an offshore wind market should be a priority for the energy sector?	Respondent skipped this question
<b>Q136</b> What do you perceive to be the major benefits to developing offshore wind assets in New Zealand?	Respondent skipped this question
Q137 What do you perceive to be the major costs to developing offshore wind assets in New Zealand?	Respondent skipped this question
Q138 What do you perceive to be the major risks to developing offshore wind assets in New Zealand?	Respondent skipped this question
Page 21: Section 8 - continued	
<b>Q139</b> This policy option involves a high level of intervention and risk. Would another policy option better achieve our goals to encourage renewable energy generation investment?	Respondent skipped this question

<b>Q140</b> Could the proposed policy option be re-designed to better achieve our goals?	Respondent skipped this question
<b>Q141</b> Should the Government introduce Renewable Portfolio Standards (RPS) requirements?	Respondent skipped this question
<b>Q142</b> At what level should a RPS quota be set to incentivise additional renewable electricity generation investment?	Respondent skipped this question
Q143 Should RPS requirements apply to all electricity retailers?	Respondent skipped this question
Q144 Should RPS requirements apply to all major electricity users?	Respondent skipped this question
<b>Q145</b> What would be an appropriate threshold for the inclusion of major electricity users (i.e. annual consumption above a certain GWh threshold)?	Respondent skipped this question
<b>Q146</b> Would a government backed certification scheme support your corporate strategy and export credentials?	Respondent skipped this question
<b>Q147</b> What types of renewable projects should be eligible for renewable electricity certificates?	Respondent skipped this question
<b>Q148</b> If this policy option is progressed, should electricity retailers be permitted to invest in energy efficient technology investments to meet their renewable portfolio standards? (See option 8.3 on energy efficiency obligations).	Respondent skipped this question
<b>Q149</b> If this policy option is progressed, should major electricity users be permitted to invest in energy efficient technology investments to meet their renewable portfolio standards? (See option 8.3 on energy efficiency obligations).	Respondent skipped this question
<b>Q150</b> What are the likely administrative and compliance costs of this policy for your organisation?	Respondent skipped this question
Page 22: Section 8 - continued	
<b>Q151</b> This policy option involves a high level of intervention and risk. Would another policy option better achieve our goals to encourage renewable energy generation investment?	Respondent skipped this question

Respondent skipped this question
Respondent skipped this question
engagement in renewable energy and energy
Respondent skipped this question

Q163 Have we accurately identified the barriers to community energy proposals?	Respondent skipped this question
<b>Q164</b> Which barriers do you consider most significant? You may select more than one answer.	Respondent skipped this question
<b>Q165</b> Are the barriers noted above in relation to electricity market arrangements adequately covered by the scope of existing work across the Electricity Authority and electricity distributors?	Respondent skipped this question
Q166 What do you see as the pros of a clear government position on community energy?	Respondent skipped this question
Q167 What do you see as the cons of a clear government position on community energy?	Respondent skipped this question
Q168 What do you see as the pros of government support for pilot community energy projects?	Respondent skipped this question
Q169 What do you see as the cons of government support for pilot community energy projects?	Respondent skipped this question
<b>Q170</b> Are there any other options you can suggest that would support further development of community energy initiatives?	Respondent skipped this question
Page 25: Section 10: Connecting to the national grid	
<b>Q171</b> Please select the option or combination of options, if any, that would be most likely to address the first mover disadvantage.	Respondent skipped this question
Q172 What do you see as the disadvantages or risks of Option 10.1?	Respondent skipped this question
Q173 What do you see as the disadvantages or risks of Option 10.2?	Respondent skipped this question
<b>Q174</b> What do you see as the disadvantages or risks of Option 10.3.1?	Respondent skipped this question
<b>Q175</b> What do you see as the disadvantages or risks of Option 10.3.2?	Respondent skipped this question

<b>Q176</b> Would introducing a requirement, or new charge, for subsequent customers to contribute to costs already incurred by the first mover create any perverse incentives?	Respondent skipped this question	
Q177 Are there any additional options that should be considered?	Respondent skipped this question	
Page 26: Section 10 (continued): Connecting to the national grid		
<b>Q178</b> Do you think that there is a role for government to provide more independent public data?	Respondent skipped this question	
<b>Q179</b> Is there a role for Government to provide independent geospatial data (e.g. wind speeds for sites) to assist with information gaps?	Respondent skipped this question	
<b>Q180</b> Should MBIE's Electricity Demand and Generation Scenarios (EDGS) be updated more frequently?	Respondent skipped this question	
<b>Q181</b> If you said yes, how frequently should they be updated?	Respondent skipped this question	
Q182 Should MBIE's EDGS provide more detail, for example, information at a regional level?	Respondent skipped this question	
<b>Q183</b> Should the costs to the Crown of preparing EDGS be recovered from Transpower, and therefore all electricity consumers (rather than tax-payers)?	Respondent skipped this question	
<b>Q184</b> Would you find a users' guide (on current regulation and approval process for getting an upgraded or new connection) helpful?	Respondent skipped this question	
<b>Q185</b> What information would you like to see in such a guide?	Respondent skipped this question	
Q186 Who would be best placed to produce a guide?	Respondent skipped this question	
Page 27: Section 10 (continued): Connecting to the national grid		
<b>Q187</b> Do you think that there is a role for government in improving information sharing between parties to enable more coordinated investment?	Respondent skipped this question	

<b>Q188</b> Is there value in the provision of a database (and/or map) of potential renewable generation and new demand, including location and potential size?	Respondent skipped this question	
Q189 If so, who would be best to develop and maintain this?	Respondent skipped this question	
Q190 How should it be funded?	Respondent skipped this question	
<b>Q191</b> Should measures be introduced to enable coordination regarding the placement of new wind farms?	Respondent skipped this question	
<b>Q192</b> Are there other information sharing options that could help address investment coordination issues? What are they?	Respondent skipped this question	
Page 28: Section 11: Local network connections and trading arrangements		
<b>Q193</b> Have you experienced, or are you aware of, significant barriers to connecting to the local networks? Please describe them.	Respondent skipped this question	
<b>Q194</b> Are there any barriers that will not be addressed by current work programmes outlined on pages 118 - 122 of the discussion document?	Respondent skipped this question	
<b>Q195</b> Should the option to produce a users' guide (see Option 10.6 on page 110) also include the process for getting an upgraded or new distribution line?	Respondent skipped this question	
<b>Q196</b> Are there other Section 10 information options that could be extended to include information about local networks and distributed generation?	Respondent skipped this question	
Q197 Do the work programmes outlined on pages 118 - 122 cover all issues to ensure the settings for connecting to and trading on the local network are fit for purpose into the future?	Respondent skipped this question	
Q198 Are there things that should be prioritised, or sped up?	Respondent skipped this question	
<b>Q199</b> What changes, if any, to the current arrangements would ensure distribution networks are fit for purpose into the future?	Respondent skipped this question	

Page 29: Additional comments

## Accelerating renewable energy and energy efficiency - Have your say

## Q200 Do you have any additional feedback?

This proposal if adopted will be very damaging for the NZ economy and particularly damaging for South Island energy users and the West Coast coal industry for very little global benefit.

**Q201** You may upload additional feedback as a file.File Respondent skipped this question size limit is 16MB. We accept PDF or DOC/DOCX.