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28 February 2020

ANZCO Foods' Submission Accelerating Renewable Energy and Energy Efficiency

Dear Sir/Madam

Thank you for the opportunity to provide feedback on the Accelerating Renewable Energy and Energy Efficiency.

ANZCO's submission is attached. Where we have feedback it is organised under various relevant headings.

We would be happy to engage further with relevant parties to address the challenges identified in our submission, to provide clarity and to help develop practical, workable solutions for the wider industry. For all inquiries please contact:

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Yours faithfully

A handwritten signature in blue ink, appearing to read "Peter Conley".

Peter Conley
ANZCO Chief Executive

ANZCO Foods' Submission Accelerating Renewable and Energy Efficiency

Introduction

ANZCO has a genuine commitment to improving its environmental footprint. We are members of the Climate Leaders Coalition and Sustainable Business Council.

ANZCO is very early on in its sustainability journey. We are committed to making improvements in our footprint and are doing some very detailed work across our part of the supply chain to understand the impact we have in relation to emissions, nutrients, and water quality and quantity. Ours is a large and complicated business and we envisage finishing this complex piece of work later this year. Knowing our current footprint will enable us to set relevant improvement targets.

ANZCO is one of New Zealand's largest red meat processors, with a turnover of \$1.65b and around 3,000 employees throughout New Zealand. We have seven processing sites, three manufacturing sites, a rendering facility and a fellmongery, which are mainly sited in rural New Zealand.

As a food processor, hot water is vital in food safety and is an integral part of the process to wash, clean and sterilize our plants. The business has taken steps to increase its energy efficiency and reduce its costs including:

- Reducing the temperature of water used for cleaning from 90 degrees to 65. This has improved health and safety and lowered energy inputs.
- Installing ammonia heat recovery systems at three of our sites
- A scheduled upgrade of a South Island coal boiler with a diesel boiler
- Weekly energy monitoring per carcass processed

In addition, in 2016 ANZCO's energy saving efforts were recognised with two Energy Efficiency and Conservation Authority (EECA) awards – winning the energy management award and getting highly commended in the large user category.

At the time ANZCO had reduced its energy use by nearly 17%, saving \$2.6m a year, reduced its energy costs by 14.4% and had a 14% reduction in carbon per kilogram of meat processed.

We invested \$3.9m in capital works to upgrade hot water systems, improve refrigeration and replace old plant with state-of-the-art energy efficient technology. The company set itself a goal of 36 gigawatt hours in annual energy savings and reached it nearly two years ahead of schedule.

We are supportive of organisations taking their obligations seriously and making environmental improvements across the country, however we have some specific concerns relating to the accelerating renewable energy and energy efficiency document as it currently stands.

Our key concerns around the document are that the new technologies are not currently advanced enough, the coal-alternatives are not readily or widely available in our catchments and the conversion costs and ongoing costs are too high in our single-digit margin business.

ANZCO accepts that things need to change, however, we also need to be able to manage a sustainable business that is an integral part of many of New Zealand's rural communities.

ANZCO's preference is for a planned, staged transitional approach – involving all key players across industries – to identify practical, appropriate and best practice solutions.

Current ANZCO situation

- ANZCO has 20 boilers at its seven processing and three manufacturing sites. Three of the boilers are coal.
- The three coal boilers are in the South Island where there are limited alternatives.
- ANZCO currently spends 20% of its operating budget on energy.
- The total costs to convert ANZCO's boilers to electric boilers would be \$41.3m.
- And as a result the amount ANZCO would spend on electricity energy costs would increase by 210% based on what ANZCO currently spends on all its energy sources.
- All ANZCO sites would require substantial upgrade to power reticulation and the lines companies providing the network supply will require a substantial infrastructure upgrade.
- In addition, the power infrastructure is not currently available so there would be additional one-off costs of conversion and power infrastructure totaling \$9.5m for the three coal boilers alone.
- In such a low margin business, this level of investment would need to be weighed against returns which could have a significant economic impact on local – mainly rural – communities. In some regions we are the largest single employer.

We are supportive of making changes, but these need to be within the confines of also having an ongoing sustainable business.

Corporate Energy Transition Plans

ANZCO opposes the public reporting as described in Corporate Energy Transition Plans. As well as this being commercially sensitive information, not all sites are the same and it would be easy for people to compare processing sites while not understanding the difference between sites including capacity and operating facilities (eg fellmongery and rendering capabilities).

Benchmarking in food industries

ANZCO does not support benchmarking for food industries only and would like clarification on why the document singles out the food industry.

In addition, as raised under the Corporate Energy Transition Plans section above comparisons between meat processing sites are complex and wouldn't give a fair picture.

Developing markets for bioenergy and direct geothermal use

There are currently mismatches between woody biomass supply and process heat energy demand, regionally creating an issue with the reliability and long-term supply.

Based on the map provided in Appendix 4, only one of our processing and manufacturing sites is in a moderate biomass fuel switching opportunity area and our three coal boilers are in the lowest planted forest areas.

Technology diffusion and capability building

Abating emissions will be difficult without new technology. While ANZCO supports new technology and capability building, conversion to alternative technologies will be challenging.

There needs to be an increase in Government funding and engagement to support the conversion of coal-fired boilers to alternative technologies as well as advancements in technology development and accessibility.

Industrial innovation and transition to a low-carbon future

A partnership between Government and Energy Intensive/Highly Integrated (EIH) industries would be of interest to ANZCO to explore further, depending on the costs of funding such initiatives.

Introduce a ban on new coal-fired boilers for low and medium temperature requirements

A broad ban is a blunt instrument that would place a high cost on the meat industry. ANZCO supports an approach to reduce emissions but submits that this must be based on robust economic analysis.

Phasing out fossil fuels in process heat

The document says “that for medium temperature requirements banning the use of coal for capacity expansion has the potential to impose significant costs on an industry and that this would depend on whether an industry is looking to expand its production in the short terms and whether production of lower emissions good is a viable option”.

This rationale wouldn't stack up for the meat industry which is already dealing with significant overcapacity.

We understand that customers and consumers want us to have a natural product and that there is increasing external interest in our footprint. ANZCO has a desire to do, and be seen to do, the right thing. However, there are a number of issues for ANZCO in phasing out fossil fuels for process heat including:

- The significant upfront and ongoing costs
- Needing to retire equipment earlier than planned and the potential flow-on effects
- A lack of alternatives in place to switch
- The location of ANZCO sites and limited access to other fuels including lines companies not having the regional substantial infrastructure available to provide the required network supply

Boosting investment in energy efficiency and renewable technologies

ANZCO would not support regulating clean energy spend. It would like further information on incentives to stimulate investment in clean energy technologies but agrees that these have the potential to impose high costs on either the Government or industry and could carry significant risk if they were not well-targeted or well-designed.

In many cases ANZCO doesn't think the new/alternative technology is at a stage where it can be readily or easily accessed.

Cost recovery mechanism

In general ANZCO supports a levy on coal users to fund EECA's process heat programmes, depending on the level of the levy. The company accepts and acknowledges that it will be moving away from its existing coal boilers and will not be using coal boilers for any scheduled replacement boilers. However this will need to be a staged process.

Renewable Electricity Certificates

ANZCO submits that this would be an expensive and intensive option to implement. New Zealand doesn't have the scale of other countries that have introduced such a quota/certificate system and this is likely to add costs across the board.

ANZCO would like to see the Government work with large energy users on an option that is less intensive and risky.

#10

COMPLETE

Collector: Final submissions link (Web Link)
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Page 1: Introduction

Q1 Name (first and last name)

Privacy of natural pe

Q2 Email

Privacy of natural persons

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

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

Q5 Business name or organisation (if applicable)

ANZCO Foods Limited

Q6 Position title (if applicable)

Group Engineering Manager

Q7 Important information about your submission (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?

Yes

Q8 Can we include your name?

No

Q9 Can we include your organisation (if submitting on behalf of an organisation)?

Yes

Q10 All other personal information will not be 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.

Respondent skipped this question

Page 2

Q11 Where are you located?

Respondent skipped this question

Q12 In what region or regions does your organisation mostly operate?

All of New Zealand

Page 3: Areas you wish to provide feedback on

Q13 Part A relates to process heat.Please indicate which sections, if any, you would like to provide feedback on.

Section 4: Phasing out fossil fuels in process heat

Q14 Part B relates to renewable electricity generation. Please indicate which sections, if any, you would like to provide feedback on.

Section 11: Local network connections and trading arrangements

Page 4: Section 1: Addressing information failures

Q15 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

Q19 What public reporting requirements (listed in Table 3) should be disclosed?

Respondent skipped this question

Q20 In your view, should businesses be expected to include transport energy and emissions in these reporting requirements?

Respondent skipped this question

Q21 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 proposes 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

Q23 If you selected no, please describe what in your view would be an appropriate threshold to define 'large energy users'.

Respondent skipped this question

Q24 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 package and feasibility studies

Q25 Do you support the proposal to develop an electrification information package?

Respondent skipped this question

Q26 Would an electrification information package be of use to your business?

Respondent skipped this question

Q27 Do you support customised low-emission heating feasibility studies? **Respondent skipped this question**

Q28 In your view, which of the components should be scaled up and/or prioritised? **Respondent skipped this question**

Q29 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

Q40 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 for bioenergy and direct geothermal use

Q41 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

Q43 Is Government best placed to provide market facilitation in bioenergy markets?

Respondent skipped this question

Q44 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

Q47 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

Q48 Do you agree that diffusing commercially viable low-emission technology should be a focus of government support on process heat?

Respondent skipped this question

Q49 Is Energy Efficiency and Conservation Authority (EECA) grant funding to support technology diffusion the best vehicle for this?

Respondent skipped this question

Q50 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: would on-site technology demonstration visits lead to reducing perceived technology risks?

Respondent skipped this question

Q52 Is there a role for the Government in facilitating this?

Respondent skipped this question

Page 10: Section 3 (continued): Innovating and building capability

Q53 For emissions-intensive and highly integrated (EIHI) stakeholders: What are your views on our proposal to collaborate to develop low-carbon roadmaps?

Respondent skipped this question

Q54 Would low-carbon roadmaps assist in identifying feasible technological pathways for decarbonisation?

Respondent skipped this question

Q55 What are the most important issues that would benefit from a partnership and co-design approach?

Respondent skipped this question

Q56 What, in your view, is the scale of resourcing required to make this initiative successful?

Respondent skipped this question

Page 11: Section 4: Phasing out fossil fuels in process heat

Q57 Do you agree with the proposal to ban new coal-fired boilers for low and medium temperature requirements?

Neither agree nor disagree

Q58 Do you agree with the proposal to require existing coal-fired process heat equipment for end-use temperature requirements below 100 degrees Celsius to be phased out by 2030?

Neither agree nor disagree

Q59 Referring to Question 56 - is this ambitious or is it not doing enough?

Ambitious,
Please explain your answer:
No reference anywhere to Question 56, should state above.

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?

Will seriously impact on future growth as the impact will be to expensive to support any new Capital projects.

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.

Capital cost to convert will be \$41.3 m.

Energy costs will go from \$5.32m to \$16.5m

Electricity network supplier infrastructure costs will be substantial, funded by who?

Q62 Could the Corporate Energy Transition Plans (Option 1.1) help to design a more informed phase out of fossil fuels in process heat? **No**

Q63 Would a timetabled phase out of fossil fuels in process heat be necessary alongside the Corporate Energy Transition Plans? **Yes**

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? **No**

Q65 If yes, how? **Respondent skipped this question**

Q66 In your view, could adoption of best available technologies be introduced via a mechanism other than the RMA? **Yes**

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

Q67 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**

Q68 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**

Q70 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

Q74 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 renewable energy under the Resource Management Act 1991

Q78 Do you agree that the current NPSREG gives sufficient weight and direction to the importance of renewable energy?

Respondent skipped this question

Q79 What changes to the NPSREG would facilitate future development of renewable energy?

Respondent skipped this question

Q80 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

Q81 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

Q82 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

Q83 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

Q84 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

Q85 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

Q86 Can any specific policies be included in a national policy statement to address these barriers?

Respondent skipped this question

Q87 What specific policies could be included in the NPSREG for small-scale renewable energy projects?

Respondent skipped this question

Q88 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

Q89 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

Q90 Are there any downsides or risks to amending the NPSREG?

Respondent skipped this question

Page 15: Section 7 - continued

Q91 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

Q92 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

Q93 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

Q94 What do you see as the relative merits and priorities of changes to the NPSREG compared with work on NES?

Respondent skipped this question

Q95 What are the downsides and risks to developing NES?

Respondent skipped this question

Q96 What renewables activities (including both REG activities and other types of renewable energy) would best be suited to NES?

Respondent skipped this question

Q97 What technical issues could best be dealt with under a standardised national approach?

Respondent skipped this question

Q98 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

Q99 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

Q100 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

Q101 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

Q103 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

Q104 Do you have any comments on potential options for pre-approval of renewable developments?

Respondent skipped this question

Q105 Are the current National Policy Statement on Electricity Transmission (NPSET) and National Environmental Standards for Electricity Transmission Activities (NESETA) fit-for-purpose to enable accelerated development of renewable energy?

Respondent skipped this question

Q106 What changes (if any) would you suggest for the NPSET and NESETA to accelerate the development of renewable energy?

Respondent skipped this question

Q107 Can you suggest any other options (statutory or non-statutory) that would help accelerate the future development of renewable energy?

Respondent skipped this question

Page 17: Section 8: Supporting renewable electricity generation investment

Q108 Do you agree there is a role for government to provide information, facilitate match-making and/or assume some financial risk for PPAs?

Respondent skipped this question

Q109 Would support for PPAs effectively encourage electrification?

Respondent skipped this question

Q110 Would support for PPAs effectively encourage new renewable generation investment?

Respondent skipped this question

Q111 How could any potential mismatch between generation and demand profiles be managed by the Platform and/or counterparties?

Respondent skipped this question

Q112 Please rank the following variations on PPA Platforms in order of preference. 1 = most preferred, 4 = least preferred.

Respondent skipped this question

Q113 What are your views on Contract Matching Services?

Respondent skipped this question

Q114 What are your views on State sector-led PPAs?

Respondent skipped this question

Q115 What are your views on Government guaranteed contracts?

Respondent skipped this question

Q116 What are your views on a Clearing house for PPAs?

Respondent skipped this question

Q117 For manufacturers: what delivered electricity price do you require to electrify some or all of your process heat requirements?

Respondent skipped this question

Q118 For manufacturers: is a long-term electricity contract an attractive proposition if it delivers more affordable electricity?

Respondent skipped this question

Q119 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

Q121 Do you consider the development of the demand response (DR) market to be a priority for the energy sector?

Respondent skipped this question

Q122 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

Q124 Which features of a demand response market would enable load reduction or asset use optimisation across the energy system?

Respondent skipped this question

Q125 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

Q128 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

Q130 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

Q132 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

Q135 Do you agree that the development of an offshore wind market should be a priority for the energy sector?

Respondent skipped this question

Q136 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

Q139 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

Q140 Could the proposed policy option be re-designed to better achieve our goals?

Respondent skipped this question

Q141 Should the Government introduce Renewable Portfolio Standards (RPS) requirements?

Respondent skipped this question

Q142 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

Q145 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

Q146 Would a government backed certification scheme support your corporate strategy and export credentials?

Respondent skipped this question

Q147 What types of renewable projects should be eligible for renewable electricity certificates?

Respondent skipped this question

Q148 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

Q149 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

Q150 What are the likely administrative and compliance costs of this policy for your organisation?

Respondent skipped this question

Page 22: Section 8 - continued

Q151 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

Q152 Could this policy option be re-designed to better achieve our goals?

Respondent skipped this question

Q153 Do you support the managed phase down of baseload thermal electricity generation?

Respondent skipped this question

Q154 Would a strategic reserve mechanism adequately address supply security, and reduce emissions affordably, during a transition to higher levels of renewable electricity generation? **Respondent skipped this question**

Q155 Under what market conditions should thermal baseload held in a strategic reserve be used? **Respondent skipped this question**

Q156 Would you support requiring thermal baseload assets to operate as peaking plants or during dry winters? **Respondent skipped this question**

Q157 What is the best way to meet resource adequacy needs as we transition away from fossil-fuelled electricity generation and towards a system dominated by renewables? **Respondent skipped this question**

Page 23: Section 8 - continued

Q158 Do you have any views regarding the options to encourage renewable electricity generation investment that we considered, but are not proposing to investigate further? (See pages 90 - 92 of the Accelerating renewable energy and energy efficiency discussion document). **Respondent skipped this question**

Page 24: Section 9: Facilitating local and community engagement in renewable energy and energy efficiency

Q159 Should New Zealand be encouraging greater development of community energy projects? **Respondent skipped this question**

Q160 What types of community energy project are most relevant in the New Zealand context? **Respondent skipped this question**

Q161 What are the key benefits of a focus on community energy? **Respondent skipped this question**

Q162 What are the key downsides or risks of a focus on community energy? **Respondent skipped this question**

Q163 Have we accurately identified the barriers to community energy proposals? **Respondent skipped this question**

Q164 Which barriers do you consider most significant? You may select more than one answer. **Respondent skipped this question**

Q165 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

Q170 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

Q171 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

Q174 What do you see as the disadvantages or risks of Option 10.3.1?

Respondent skipped this question

Q175 What do you see as the disadvantages or risks of Option 10.3.2?

Respondent skipped this question

Q176 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

Q178 Do you think that there is a role for government to provide more independent public data? **Respondent skipped this question**

Q179 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**

Q180 Should MBIE's Electricity Demand and Generation Scenarios (EDGS) be updated more frequently? **Respondent skipped this question**

Q181 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**

Q183 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**

Q184 Would you find a users' guide (on current regulation and approval process for getting an upgraded or new connection) helpful? **Respondent skipped this question**

Q185 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

Q187 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**

Q188 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**

Q191 Should measures be introduced to enable coordination regarding the placement of new wind farms?

Respondent skipped this question

Q192 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

Q193 Have you experienced, or are you aware of, significant barriers to connecting to the local networks? Please describe them.

Networks ANZCO generally use have no spare capacity and to have more capacity now, their is a user pay methodology.

Q194 Are there any barriers that will not be addressed by current work programmes outlined on pages 118 - 122 of the discussion document?

No

Q195 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?

Yes

Q196 Are there other Section 10 information options that could be extended to include information about local networks and distributed generation?

No

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?

Yes

Q198 Are there things that should be prioritised, or sped up?

Respondent skipped this question

Q199 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

Q200 Do you have any additional feedback?

Respondent skipped this question

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

Respondent skipped this question