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Page 1: Introduction

Q1 Name (first and last name)

Lincoln Watson

Q2 Email

lincoln.watson@espnz.co.nz

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?

Consultant, financial services etc

Q5 Business name or organisation (if applicable)

Energy Solution Providers Limited

Q6 Position title (if applicable)

CEO

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?	**Yes**
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 1: Addressing information failures,** **Section 3: Innovating and building capability,** **Section 4: Phasing out fossil fuels in process heat,** **Section 5: Boosting investment in renewable energy and energy efficiency technologies**

Q14 Part B relates to renewable electricity generation. Please indicate which sections, if any, you would like to provide feedback on.	**Section 8: Supporting renewable electricity generation investment**

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?	**I support this option in part**

Q16 Please explain your answer

We agree that a lack of information available internally and externally to businesses on energy use and emissions is an issue and are supportive of energy users being required to report their emissions and energy use annually, along with corporate energy transition plans for the following reasons:

1. ESP has had a long history in Energy management and Energy Efficiency. We achieve results in the order of 46% reduction in stationary energy use for Air NZ, 41% for ASB along with many other successes. Customers that achieve the most successful results have high degrees of transparency internally and embed energy as an investment and change driver into their operational decision making. In reverse we have customers that are monitoring their environment however taking little action, despite strong business cases and low resource intensive activities required. Our extensive experience shows that accountability for results and change is best achieved when information on current state, a desired future state and a mandate for transparency and action is in place. Published impact and transition plans will be the best method for doing this.

2. We note that many proactive businesses, making genuine investment and efforts for change identify that processes and reporting change significantly over a time – it is often described as a 'journey'. A number of global frameworks exist that business use that suit their organisation more than other options. Frameworks are one of the most commonly used methods of getting started with improvement. We believe a prescriptive approach to reporting will be stifling, add administrative overhead and become a compliance function rather than becoming sustainably embedded in operational processes and decision making.

3. We also acknowledge that businesses have many stakeholders. Stakeholders have both different needs for information and ability to consume it. As an example it is positive NZX listed companies produce sustainability information, however whilst shareholders want to know the company is making a difference the level of detail they are interested in and can consume is a far lower threshold that is needed to ensure that real change is occurring. We accept that a shareholder document will have nice graphics, be limited in real estate within published documentation and suggest that there should be a second tier that is 'pre-marketing' and more 'technical in nature' for the use of actual sustainability reporting.

We however do not support the requirement for a prescriptive approach to energy audits every 4 years for the following reasons:
1. ESP is one of the largest providers of energy management services in New Zealand and has operated for 20 years. Over this time we have performed a range of work for customers and are one of EECA's most active partners. ESP provides a range of audit services, including Type 1-3 to AS/NZS3598: Energy Audit Standard, building ratings etc. We are therefore a supporter of audit processes and appropriate rigour, however these need to be within the right context and should not be the primary mechanism to measure and identify activity or results. A prescriptive approach of using Audits is not the best, nor only approach to achieve an outcome. We believe there is a better approach that generates a more successful and sustainable outcome is a data led approach supported by smaller focused audits supported by data from monitoring rather than prescriptive high cost Audits (ie small a v capital A). This approach allows businesses to target a series of SMART goals being Specific, Measurable, Attainable, Relevant and Time-bound, and work in a more agile manner to execute, measure and report on achievement with better return on investment and increased sustainability. Certainly, any legislated requirement should not be prescriptive to Audits only.

2. Energy oriented Audits are not the same as business/financial Audits. They do not focus on processes and systems for achieving sustainable and predictable results as much as current state and opportunities for improvement. They are therefore temporary in nature and not a good indicator of ability to achieve or sustain results.

3. ISO 50001 compliant companies along with reporting is a stronger, more sustainable approach which we do agree should be allowed as an option for achieving compliance.

4. An Audit can only be performed over a short time slice ie may occur over 1-5 days. In simple terms a cyclic business or even seasons can significantly affect the information available during an Audit. A consultant must visit a site to understand the business operations, but this should be supported by actual data on energy use from that site across a wider time period so that solid and reliable recommendations can be made. As in an absence of data these become highly opinionated and contain numerous assumptions.

5. Due to the fluid nature of businesses Audits quickly become irrelevant, even over a year they are of very questionable value. Over 4 years a business changes / grows significantly making audit-based baselining and measurement extremely inaccurate and largely pointless. Much of the time required will be spent justifying change instead of adding value to business performance.

Monitoring plus regression models perform better and generate better value for businesses.

6. Audits are inherently people based. They are therefore open to opinion and variability. A data-based approach allows for technology-oriented solutions to emerge and generate further productivity improvement and options.

7. Audits push a significant cost onto a business that is not in line with alternative investments that generate better results. Audits can have a significant cost per site and many firms can have a large number of sites – adding up to a very significant investment.

8. Most customers do not value the full extent of an audit. In short there is a lot of technical explanation in consultant speak they do not care about. Fundamentally they want to understand the actions they should take to generate results. This is a cost forced on businesses to justify the quality of the Audit rather than value – alternative approaches eg monitoring plus audit have greater value and this option should be either prescribed or at a minimum made available as an option.

9. Smaller businesses also contribute to energy use, emissions and the energy efficiency opportunity. An audit-based approach will be prohibitive to these businesses, however a technology-based monitoring approach will allow these businesses to contribute to change and efficiency under a less prescriptive policy

10. Noting that whilst we promote data based decision making, we also acknowledge that not all data are the same. Simple kwh metrics from retailers is not enough to tick the data box – the information needs to be deeper to generate the real returns. Any approach needs to be clear on what level of monitoring is acceptable.

Q17 Which parts (set out in Table 3) do you support?

Target group - companies with an annual energy spend of greater than $2 million per annum

,

Public reporting,

Government reporting,

Energy auditing,

Compliance

Q18 Please explain your answer

We agree Corporate Energy Transition Plans may accelerate the adoption of energy saving and emission reducing technologies in response to greater visibility, transparency and accountability on energy use and emissions impact.

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

Annual corporate-level energy use and emissions, split out by a range of sources including coal, gas, electricity and transport

,

Energy efficiency actions taken that year,

Plans to reduce emissions to 2030

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

Yes,
Please explain your answer:
Transport energy has been identified as a significant emissions source and needs appropriate focus. As a member of the Sustainable Business Council and Climate Leaders Coalition we have found significant value in the process of objectively identifying our emissions ourselves. The tangible identification of transport as our largest source has been very valuable to engage staff internally in the outcome.

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 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?

No

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

We believe that this is appropriate for now however room should be left to move this down market down to $250k plus there are a significant number of large energy users.

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?

Yes

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

Yes

Q27 Do you support customised low-emission heating feasibility studies?

Yes

Q28 In your view, which of the components should be scaled up and/or prioritised?

regularly publishing information on electricity reliability for large sites	**Scaled up**
providing information about ways to increase reliability and resilience of electrically- supplied plant and systems	**Scaled up**
co-funding low-emission heating feasibility studies for EECA's business partners	**Prioritised**

Q29 Would a customised low-emission heating feasibility study be of use to your business?

Yes

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?

Yes

Q32 Would benchmarking be suited to, and useful for, other industries, such as wood processing?

Yes (please specify):
We believe all industries would benefit from data based benchmarking.

Q33 Do you believe government should have a role in facilitating this or should it entirely be led by industry?

Government should have a role

Q34 Please explain your answer

Government should have light touch policy with the majority of the investment and effort from industry as we feel that this is something that can be achieved without government intervention and cost.

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?

Disagree,
Please explain your answer:
Good measurement and energy efficiency should always be dealt with first and any further investment should follow this. Any support for de-risking alternative technologies should be delivered through existing mechanisms eg Callaghan. Attention and funding should not be removed from the best business case alternatives. Business understands and responds to financial benefit and businesses can get started simply and with low cost on removing waste from the energy use. This effort has a clear and easy to understand business case that can be reinvested. This will be the most effective and efficient way to achieve traction and build sustainable that makes sense and adds value to businesses.

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

Agree,
Please explain your answer:
Good measurement and energy efficiency should always be dealt with first and any further investment should follow this. Whilst we support diffusing of alternative technologies attention and funding should not be removed from the best business case alternatives. Business understands and responds to financial benefit and businesses can get started simply and with low cost on removing waste from the energy use. This effort has a clear and easy to understand business case that can be reinvested. This will be the most effective and efficient way to achieve traction and build sustainable that makes sense and adds value to businesses.

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

Yes

Q50 For manufacturers and energy service experts: would peer learning and lead to reducing perceived technology risks?

Yes

Q51 For manufacturers and energy service experts: would on-site technology demonstration visits lead to reducing perceived technology risks?

Yes

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

Yes,
Please expand on your answer:
Good measurement and energy efficiency should always be dealt with first and any further investment should follow this. So whilst EECA would be the best vehicle for diffusion it should not replace existing funding. As a long time business in this sector we have seen good results by peer sharing of knowledge in the adoption of action and technology. We believe governments role should be facilitation rather than carrying the cost of the additional service that can be met by industry. As a long time business in this sector we have seen good results by on site demonstrations in the adoption of action and technology. We believe governments role should be facilitation rather than carrying the cost of the additional service that can be met by industry. Government should support and promote these efforts however it should not take on the costs of delivery. Business understands and responds to financial benefit and businesses can get started simply and with low cost on removing waste from the energy use. This effort has a clear and easy to understand business case that can be reinvested. This will be the most effective and efficient way to achieve traction and build sustainable that makes sense and adds value to businesses.

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?

We agree that the government is able to encourage action on change however engagements should be data driven rather than opinion based. In addition government has a history of targeted intervention that has generated activity and then exit which then returns to normal or below normal. We believe that an on off model is not as effective and government should not be the vehicle for execution.

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

Yes,
Please explain your answer:
There is absolute value in this, however it should not be at the expense of energy efficiency as these two must go hand in hand for any change embedded in the operational decision-making of an organisation

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

Information and traction. The government has shown the ability to engage at high levels in an organisation to gain traction. This is very beneficial to gaining engagement and traction.

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

We believe the focus should be on energy efficiency, particularly via data as this generates return that can be reinvested. Very clear business cases can be identified and prioritised with low cost fixes gaining wins. This would enable further more complex action to be taken.
Government resourcing can therefore be focused on ‘account management’ rather than scaling technical consulting resource (of which there is a shortage).

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?	**Strongly agree**
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?	**Strongly agree**
Q59 Referring to Question 56 - is this ambitious or is it not doing enough?	**Ambitious,** Please explain your answer: This is critical, however ambitious. The target of below 100 degrees is sensible, however many businesses have decade long investment cycles which writing these off can cause significant financial hardship.
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?	**Respondent skipped this question**
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.	**Respondent skipped this question**
Q62 Could the Corporate Energy Transition Plans (Option 1.1) help to design a more informed phase out of fossil fuels in process heat?	**Yes,** Please explain your answer: As a long time business in this sector we have seen good results through knowledge sharing in the adoption of action and technology. Process heat changes are complex and often expensive. Business apply significant rigour to these decisions which are made by smart people. Published plans to identify changes will generate accelerated action.

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

Yes,
Please explain your answer:
We believe that businesses will need encouragement to take action. They should be supported to gain success through energy efficiency as a means to reinvest on larger longer payback projects. Some form of 'stick' will also be required. Some forms of regulation should be utilised which a timetable should be part of. Government should however be cautious of too much cost build up and look to keep this simple and easy to manage.

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?

Yes

Q65 If yes, how?

A very cautious yes as the RMA has been an unwieldy and bureaucratic mechanism that is not viewed well. A separate more agile approach that can evolve with the rapid pace of the industry would be more suitable.

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

Yes,
Please explain your answer:
The RMA should not be a mechanism for defining solutions as this will lead to a range of negative consequences.

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?

Agree

Q68 Would you favour regulation, financial incentives or both?

both,
Please explain your answer:
We believe the measures being evaluation in this proposal along with the current bill and ETS are good but as far as this should go. Financial incentives from government within the context of energy efficiency gains first are favoured as are commercial responses such as green finance.

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

internal competition for capital

Q70 If you favour financial support, what sort of incentives could be considered?

The focus of any initiative should be first to remove the waste – this will generate savings that can be reinvested. This is where the financial support should be focused initially.

EECA has historically financially supported auditing – which lead to be a big rise in auditing. When the incentives were removed the number of audits dropped again. Large audits do not add value to business performance, these need to be lighter and put in the context of other more complete information available.

Continued support for monitoring and targetting is proven to generate substantial savings and embedding data on energy and emsissions into decision making.

Q71 What are the benefits of these incentives?

Businesses gain financial return for their investment and positive action that can be reinvested and used to embed energy management into decision making.

Q72 What are the risks of these incentives?

We promote data based decision making, however we also acknowledge that not all data are the same. Simple kwh metrics from retailers is not enough to tick the data box – the information needs to be deeper to generate the real returns.

Q73 What are the costs of these incentives?

The costs of these incentives were in place for some time however have been scaled back. This will reduce the quality of information available to effect change and enable business performance and efficiency.

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?

provide information	**Strongly agree**
facilitate match-making	**Strongly disagree**
assume some financial risk	**Strongly disagree**

Q109 Would support for PPAs effectively encourage electrification?

Yes - support for PPAs would effectively encourage electrification

Q110 Would support for PPAs effectively encourage new renewable generation investment?	**Yes - support for PPAs would effectively renewable generation investment**
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?

Yes,
Please explain your answer:
As businesses become more intimately involved and responsive/active in their energy use and emissions they will need to have the ability to take more ownership of how they manage it. This will require more real time control and information which a DR market will enable.

Q122 Do you think that demand response (DR) could help to manage existing or potential electricity sector issues?

Yes

Q123 What are the key features of demand response markets?

Particularly the ability for demand to act and react quickly.

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

Clear information and metrics on current and forecast use.

Q125 Which features of a demand response market would enable the uptake of distributed energy resources?

Clear information and metrics on current and forecast use that enable rapid switching

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?

Yes

Q129 Is there an alternative policy option that could deliver on this aim more effectively?

No

Q130 If progressed, what types of energy efficiency measures and technologies should be considered in order to meet retailer/distributor obligations?

The commercial market is responding to the opportunity without direct government intervention. Admittedly this is slow but this is primarily due to end customer engagement. Current action is taking care of this and with direction and support this will gain momentum.
Many energy retailers and lines companies are already looking at taking action or partnering in this space already which is leading to outcomes for business and investment in services.

Q131 Should these be targeted at certain consumer groups?

Yes but in line with market demand. Currently the focus in on large users, and through education at domestic. As technology improves the markets will open up.

Q132 Do you support the proposal to require electricity retailers and/or distributors to meet energy efficiency targets?

I support the proposal,
Please explain your answer:
We believe that this should be evaluated as a mechanism if the current progress in the market is not achieved. At this stage we believe industry will sort this out.

Q133 Which entities would most effectively achieve energy savings?

Those that connect the last mile to customers.

Q134 What are the likely compliance costs of this policy?

If retailers are required to enter this market there will be significant cost in terms of time and money. Regulated firms will need to build up teams which will remove resource from the wider market and therefore neutralise its effect. The time to achieve momentum will be longr than through effective acquisitions and partnerships.

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?

Disagree

Q136 What do you perceive to be the major benefits to developing offshore wind assets in New Zealand?

Its a known solution that can be deployed rapidly compared to the unknowns of other solutions. Prices are coming down.

Q137 What do you perceive to be the major costs to developing offshore wind assets in New Zealand?

Build and environmental costs.

Q138 What do you perceive to be the major risks to developing offshore wind assets in New Zealand?

cost and environment.

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?

Gain the data on usage, work actively to reducing waste and gaining greater accuracy in demand.

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.	**Respondent skipped this question**
Q194 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**
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?	**Respondent skipped this question**
Q196 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**
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