#29

COMPLETE

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Page 1: Introduction

Q1 Name (first and last name)

Oliver Krollmann

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?	**General public**
Q5 Business name or organisation (if applicable)	**Respondent skipped this question**
Q6 Position title (if applicable)	**Respondent skipped this question**
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?	**Northland / Te Tai Tokerau**
Q12 In what region or regions does your organisation mostly operate?	**Respondent skipped this question**

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 2: Developing markets for bioenergy and direct geothermal use** **,** **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** **,** **Section 6: Cost recovery mechanisms**
Q14 Part B relates to renewable electricity generation. Please indicate which sections, if any, you would like to provide feedback on.	**Section 7: Enabling renewables uptake under the Resource Management Act 1991** **,** **Section 8: Supporting renewable electricity generation investment** **,** **Section 9: Facilitating local and community engagement in renewable energy and energy efficiency** **,** **Section 10: Connecting to the national grid,** **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?

Yes - I fully support this option

Q16 Please explain your answer

Large energy users need a "push" to take their emissions more seriously

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

Public reporting,

Government reporting,

Energy auditing,

Compliance

Q18 Please explain your answer

Annual spend might be an inappropriate measure, if energy is created and self-consumed on-site (e.g. Refinery NZ)

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,

Other (please specify):

A strategy and target year to become carbon-neutral

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

Yes,

Please explain your answer:

Transport accounts for roughly a fifth of NZ's emissions. Omitting transport energy and emissions would distort the picture.

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’.

The threshold should be defined based on energy consumption using an energy measure in Watts (W) or Joules (J), rather than financial expenses (see also answer to Q17 above)

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?

Yes (please explain):
As stated in the document, however, already reported data could be shared, to minimise the requirement to report the same data multiple times by listed large energy users

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	**Prioritised**
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.

Case studies (domestic and overseas) and a checklist to help identify possible low-hanging fruit or opportunities for low-emission heating

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):
…, provided that the processes were similar and well-defined enough to be able to apply a usable benchmark

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

There is currently a large amount of confusion and uncertainty in the sector. Government facilitation will provide a common understanding and allow a more targeted approach.

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?

Neither agree nor disagree

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.

I lack specific knowledge, however, I have seen anecdotal evidence in the news that some councils might be applying rules that are no longer fit for purpose

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?

Agree,
Please explain your answer:
Existing rules and standards might be out of date, given the recent technological progress in wood energy generation

Q38 What do you consider a NESAQ users' guide should cover? Please provide an explanation if possible.

The proposed information described in option 2.1 appear sufficient

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?

Yes

Q42 What other options are worth considering?

Encourage collaboration between regional market participants, to identify win-win opportunities

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

Yes

Q44 How could Government best facilitate bioenergy markets?Please be as specific as possible, giving examples.

By introducing a currency for bioenergy, or including bioenergy in the NZ-ETS

Q45 In your view, how can government best support direct use of geothermal heat?

By identifying potential geothermal sites and their capacity, and by making suggestions which kinds of energy users might be suitable for a particular site

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?

Strongly agree,
Please explain your answer:
Government support will provide businesses with certainty that this is the future rather than a niche technology

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

Strongly agree,
Please explain your answer:
Same as Q46

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?

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?

Yes,
Please expand on your answer:
The EECA scheme funding projects in the electric vehicle area (low-emissions vehicle contestable fund) is a good example. It supports a wide variety of initiatives, pilots and proof-of-concept projects, while at the same time growing the required infrastructure, and it is well-covered and communicated in the press. The same approach should be used here.

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?

Yes,
Please explain your answer:
It is important to provide a view that this is in fact achievable in the future, and not something that is completely out of the question

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

Developing a common mindset that EIHI decarbonisation has to happen eventually

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?

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?

Not doing enough,
Please explain your answer:
It is a good start, but it should also set indicative targets for high temperature requirements as well as other fossil fuels

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: Transition plans provide stronger guidance to consider available alternatives for process heat
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: It provides more certainty and prompts users to get started with a transition, rather than debating and procrastinating
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,** Please explain your answer: Given the planned overhaul of the RMA and possible break-up into multiple pieces of more specialised legislation, this might be better placed there, or under another amendment of the Climate Change Response Act

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?	**regulation,** Please explain your answer: While the NZ-ETS is more general, it already provides the financial incentive, thus regulation would be more suitable to keep unwanted developments or perverse effects at bay

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

access to capital

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?

A more aggressive ramping up of the carbon price under the NZ-ETS

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?

It is time to invest big and not to think too much about cost recovery, however, given the fact that coal has so far been exempt there is a clear case for a coal levy to send a strong signal, just like it is currently considered for waste/landfill

Q76 What are the advantages of introducing a levy on consumers of coal to fund process heat activities?

To level the playing field with regards to the other types of energy, and to send a strong signal that the age of coal is over

Q77 What are the disadvantages of introducing a levy on consumers of coal to fund process heat activities?

None

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?

Neither agree nor disagree

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

The described amendments and making it more directive seem to cover it well

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?

Making the consideration of renewable energy a requirement and a priority for all new applications as well as renewals

Q81 How should the NPSREG address the balancing of local environmental effects and the national benefits of renewable energy development in RMA decisions?

Minor local environmental effects are acceptable if these can either be mitigated over time or offset by improving the environment elsewhere in a way that counteracts the effects

Q82 What are your views on the interaction and relative priority of the NPSREG with other existing or pending national direction instruments?

Renewable energy generation has to take priority over economic considerations, unless there is strong proof of no net benefit over a period of at least 30 years

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?

See answer to Q80

Q84 What objectives or policies could be included in the NPSREG regarding councils' role in locating and planning strategically for renewable energy resources?

An obligation to identify and support (by adapting the consenting processes) opportunities for local or regional renewable energy generation

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?

There doesn't seem to be any existing framework for tidal energy (stream, barrage or lagoon)

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

Develop policies that cover renewable energy in general, rather than specific policies by type, and then refine the general framework as needed for particular types of renewable energy. This would cover present and future, as yet unexplored or unproven, energy types.

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

A fast track for standardised small-scale projects and deployments that can be covered by a general consent and don't have to go through a separate approval process

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?

If a generation activity is mostly (to 75% or more) covering the self-consumption of the community it is located in, then it is small and community-scale

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?

Include any technological progress or variation in the consent, as long as the newer technology does not materially alter the design or operation of the wind farm

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

None

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?

It provides a nationwide framework and covers standardised renewable energy solutions and deployments

Q93 What are the cons of using National Environmental Standards as a tool to accelerate the development of new renewables and streamline re-consenting?

None

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

As stated in the document, amending the NPSREG is the quick fix while the work on the NES will provide the future framework

Q95 What are the downsides and risks to developing NES?

None

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?

See earlier answers

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 ?	**NPSREG or NES are sufficient**
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	**Agree**
assume some financial risk	**Neither disagree nor agree**

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?

Include energy storage and demand response in the PPA

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

Contract matching service	**2**
State-sector led	**1**
Government guaranteed contracts	**4**
Clearing house	**3**

Q113 What are your views on Contract Matching Services?

Respondent skipped this question

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

These should be the easiest to implement and could serve as a proof-of-concept, good example and successful case study

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:
It will help smoothen out demand peaks and increase the percentage of renewable energy generation

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?

Integration of energy storage (e.g. battery, hydro) and smart technology to manage demand (e.g. EV charging)

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

Energy storage, to supply stored energy at times of increased demand, smart technology, to shift load patterns to periods of increased supply, and pricing, to encourage better behaviour through financial incentives

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

Integration and support of micro-generation (rooftop solar, community energy generation, vehicle-to-grid), smart technology to manage these according to demand, and fair pricing, taking into account that more distributed generation means less transmission over long distances

Q126 What types of demand response services should be enabled as a priority?

Battery storage and vehicle-to-grid, which would also help with EV uptake and electrification of the vehicle fleet

Q127 Which services make sense for New Zealand?

Given the fact that we're surrounded by the ocean, tidal energy generation and storage should be explored further, because of its predictable generation pattern and potential for energy storage in pools or lagoons

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?

Minimum energy efficiency ratings, combined with a ban of technologies that don't meet these ratings, and a managed phase-out of existing inefficient technology, similar to the approach proposed for low-temp process heat

Q131 Should these be targeted at certain consumer groups?

No, although preference could be given to groups where efficiency improvements are most likely or beneficial (e.g. the warmer and dryer homes)

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:
NZ as a whole has a nonchalant attitude towards energy consumption. Energy efficiency standards force us to change our thinking and let go of old-fashioned views (e.g. the perceived "beauty" of a woodfire-heated home compared to an energy-efficient home with a heat pump)

Q133 Which entities would most effectively achieve energy savings?

Consumers (as described in the benefits section) and the transport sector (through electrification or more fuel-efficient vehicles)

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?

Agree

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

NZ is well suited for offshore wind energy generation. Even if there is no matching demand yet for a large-scale offshore wind farm, excess energy could be used to generate green hydrogen by electrolysis, which would then be used as fuel for heavy transport, future aircraft, or as stored energy for demand response

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

Upfront investment to build the wind farm and transmissions infrastructure, however, this could again be managed by PPAs with large consumers, e.g. hydrogen generators

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

None

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?	**No**
Q140 Could the proposed policy option be re-designed to better achieve our goals?	**No**
Q141 Should the Government introduce Renewable Portfolio Standards (RPS) requirements?	**Yes**

Q142 At what level should a RPS quota be set to incentivise additional renewable electricity generation investment?

5% above the average renewable electricity generation, e.g. 89% for the current average of 84%, to provide incentives to drive the average up over time

Q143 Should RPS requirements apply to all electricity retailers?	**Yes,** Please explain your answer: Excluding retailers, particularly gentailers that maintain fossil-fuel electricity generation for peak or critical demand, could take away their incentive to increase their renewable electricity generation
Q144 Should RPS requirements apply to all major electricity users?	**Yes,** Please explain your answer: As stated in the document, voluntary schemes might not be effective enough, and an inclusion of all major users levels the playing field and prompts them to seek PPAs and/or investigate their potential for self-production or on-site generation of renewable energy
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?

All emissions-free technologies (e.g. wind, solar). Renewables that generate emissions (e.g. geothermal) up to a certain cap, unless emissions are eliminated by carbon capture (but not by offsetting under the NZ-ETS)

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).	**Yes**
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).	**Yes**
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?	**No**
Q152 Could this policy option be re-designed to better achieve our goals?	**No**
Q153 Do you support the managed phase down of baseload thermal electricity generation?	**Strongly support**
Q154 Would a strategic reserve mechanism adequately address supply security, and reduce emissions affordably, during a transition to higher levels of renewable electricity generation?	**Definitely would**

Q155 Under what market conditions should thermal baseload held in a strategic reserve be used?

As stated in the document

Q156 Would you support requiring thermal baseload assets to operate as peaking plants or during dry winters?	**Yes**

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?

Replacing thermal baseload by additional energy storage (battery, hydro, tidal, green hydrogen) and demand management

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?

Yes

Q160 What types of community energy project are most relevant in the New Zealand context?

Micro-generation at the community level for self-consumption, and independent microgrids with local energy storage, to make remote areas self-sufficient

Q161 What are the key benefits of a focus on community energy?

Increased renewable energy generation for local self-consumption, smoothening out demand peaks, and reduced long-distance transmission

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?

Yes

Q164 Which barriers do you consider most significant? You may select more than one answer.

Small scale of community energy advocates, and lack of networking effects

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?

Yes - they're adequately covered by existing work

Q166 What do you see as the pros of a clear government position on community energy?

Increased certainty for planning and investment of community energy solutions

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?

Providing proof-of-concepts and case studies that can be learned from, adapted and reproduced in many other communities

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?

An EECA contestable fund for community energy projects

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.

Option 10.1 - Encourage Transpower to include the economic benefits of climate change mitigation in applications for Commerce Commission approval of projects expected to cost over $20m.

,

Option 10.2 - Put in place additional mechanisms to support or encourage, Transpower, first movers and subsequent customers to agree to alternative forms of cost sharing arrangements by contract.

,

Option 10.3.2 - Provide for Transpower to build larger capacity connection asset or a configuration that allows for growth, but only recover full costs once asset is fully utilised, with the Crown covering risk of revenue shortfall.

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?

Instead of writing off oversized assets, efforts should be made to attract other customers and recover cost according to 10.2, given the general need for increased electrification

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?	**No**
Q177 Are there any additional options that should be considered?	Yes (please specify): In general the benefit principle should apply - who benefits from new and existing infrastructure should contribute to the cost of building and maintaining that infrastructure

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?	**Yes,** Why or why not?: It levels the playing field and provides a common basis for planning and investment
Q179 Is there a role for Government to provide independent geospatial data (e.g. wind speeds for sites) to assist with information gaps?	**Yes**
Q180 Should MBIE's Electricity Demand and Generation Scenarios (EDGS) be updated more frequently?	**Yes**
Q181 If you said yes, how frequently should they be updated?	**Every six months**
Q182 Should MBIE's EDGS provide more detail, for example, information at a regional level?	**Yes,** Please provide information on what you would find useful: Opportunities for renewable energy generation in a particular area or region
Q183 Should the costs to the Crown of preparing EDGS be recovered from Transpower, and therefore all electricity consumers (rather than tax-payers)?	**Yes - it should be recovered from Transpower (all electricity consumers)**
Q184 Would you find a users' guide (on current regulation and approval process for getting an upgraded or new connection) helpful?	**Yes**

Q185 What information would you like to see in such a guide?

Step-by-step instructions in plain English and case studies of various connection projects

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?

Yes,
Why or why not?:
To help identify opportunities for win-win scenarios and shared investments

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?

Yes

Q189 If so, who would be best to develop and maintain this?

The Electricity Authority (in collaboration with Transpower)

Q190 How should it be funded?

By a levy on electricity, funded 50:50 by consumers and generators

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

Yes

Q192 Are there other information sharing options that could help address investment coordination issues? What are they?

Availability of funding options and/or EECA-provided contestable funds for renewable energy projects

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?

Yes

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

Yes,
Please specify which options would be useful, and explain your answer.:
Guidelines that explain and help decide whether to choose to invest in distributed generation or increase energy efficiency and manage demand instead

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?

Investigation of a peer-to-peer market model, to enable distributed and micro-generators to trade with particular consumers

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?

Fantastic and very comprehensive consultation document, thanks for putting it together and giving us the opportunity to comment and provide feedback. I've learned a lot along the way.

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

Respondent skipped this question