

Submission to an application for resource consent under section 96 of the
Resource Management Act 1991

To: Hurunui District Council
Name: Ministry of Economic Development
Address: P.O. Box 1473, Wellington.

1. The Ministry of Economic Development (MED) supports the application by MainPower New Zealand Limited for resource consent to construct and operate a wind energy development referred to as the Mt Cass Wind Farm in the Hurunui district, North Canterbury. MED supports the application because it contributes to national energy objectives and as long as environmental impacts are appropriately avoided, remedied or mitigated.

2. The particular parts of the application MED supports are:

The whole of the application.

3. The reasons for making this submission are:

MED considers that the Mt Cass Wind Farm offers national benefits, by making use of a viable and renewable energy source, helping ensure security of supply through diversification in electricity production methods, and by generating electricity in an environmentally responsible manner that avoids greenhouse gas emissions.

This submission seeks to ensure that the contribution Mt Cass would make to achieving the government's energy objectives is taken into account in the consent decision.

Mt Cass's contribution to government policies and objectives

The government is committed to a sustainable energy system. New Zealand needs to respond to climate change and reduce carbon emissions from our energy production and use. We also need to ensure our energy systems can deliver secure, clean energy at affordable prices to support economic development.

In the past six years, the government has introduced a number of specific energy and energy-related policies and strategies that contribute to a more sustainable energy system. They include:

- the New Zealand Energy Strategy to 2050 (October 2007), which sets out a path to a sustainable low emissions energy system (addressed in more detail below);
- the New Zealand Energy Efficiency and Conservation Strategy¹ (October 2007)
- the introduction of an Emissions Trading Scheme (ETS) to address climate change. This is to be implemented progressively from 2008 to include all sectors of the economy by January 2013.
- the Sustainable Development Programme of Action in 2003, which sets out principles for sustainable development policy and decision-making. Energy is one of four action areas identified in the programme;

¹ Prepared under the Energy Efficiency and Conservation Act 2000.

- the Government Policy Statement on Electricity Governance², which outlines the overall objective for the electricity industry of ensuring that electricity is produced and delivered to all classes of consumer in an efficient, fair, reliable and environmentally sustainable manner and promoting and facilitating the efficient end use of electricity;
- amendments to section 7 of the RMA (addressed in more detail below);
- the preparation of a National Policy Statement on Renewable Electricity; and
- the establishment of the Electricity Commission in 2003.

New Zealand Energy Strategy

In October 2007, the Government released the New Zealand Energy Strategy to 2050 (NZES). The NZES sets out the Government's vision of "a reliable and resilient system delivering New Zealand sustainable, low emissions energy services, through:

- Providing clear direction for the future of New Zealand's energy system;
- Utilising markets and focused regulation to securely deliver energy services at competitive prices;
- Reducing greenhouse gas emissions, including through an emissions trading scheme;
- Maximising the contribution of cost-effective energy efficiency and conservation;
- Maximising the contribution of cost-effective renewable energy resources while safeguarding our environment;
- Promoting early adoption of environmentally sustainable energy technologies;
- Supporting consumers through the transition".

As part of the Strategy, the government has set a target that 90 percent of our electricity be generated from renewable sources by 2025.

Mt Cass would make a significant contribution to the government's renewable electricity target. It would help New Zealand move towards a sustainable energy system by:

- securely delivering energy services at competitive prices;
- maximising the contribution of cost-effective renewable energy resources while safeguarding our environment; and
- contributing to a reduction in New Zealand's greenhouse gas emissions.

This is discussed in more detail below.

Security and reliability at a competitive prices

Maintaining security of energy supply at competitive prices is essential for a modern economy. Supply interruptions and steeply rising prices cause social stress and hardship.

Long-term security of supply requires:

- Building enough generation capacity to meet peak demands;
- Ensuring there is enough fuel (taking into account the uncertainty of hydro inflows and wind flows) to generate sufficient electricity at all times;

² Prepared under the Electricity Act 1992.

- Building and maintaining a transmission system to convey power from generation plants to consumers, particularly at peak times; and
- Making the most of cost-effective energy efficiency opportunities.

Mt Cass would contribute to security of supply by increasing generation capacity, particularly as it is located in a different region from other wind farms.

Building enough generation capacity to meet demand

Demand for electricity is growing. Electricity demand is projected to grow at around 1.3 percent per annum over the period to 2030³.

Energy efficiency and conservation measures, along with technologies such as solar water heating, are vital and necessary parts of New Zealand's future energy mix. However, these measures and technologies will not be enough to offset the need for new generation in the short to medium term. There is a pressing need to build new generation capacity to meet this growth in demand.

New Zealand currently has around 6300 MW of renewable generation capacity, and 2900 MW of fossil fuel generation, providing around 40,000 gigawatt hours of electricity per year. Under current forecasts, electricity demand is expected to grow by around 22% by 2025, which would require approximately 3200 MW of additional generation capacity to maintain security of supply.

Mt Cass, at a maximum capacity of 69 MW, would contribute to the increased generation capacity required to satisfy demand, while reducing New Zealand's dependence on non-renewable energy sources.

Ensuring there is enough fuel to generate at all times

Diversification of generation types and location is also important for ensuring there is enough fuel to generate electricity.

Around 60 percent of New Zealand's electricity is generally from hydro generation. New Zealand's heavy reliance on hydro-generated electricity leaves it vulnerable to the effects of dry years. In comparison, wind currently contributes less than two percent of total electricity generation.

One of the considerable advantages of electricity generated by wind is that it can help complement hydro-generation. Typically, there is still wind available in dry years or during periods of low expected rainfall, allowing water to be conserved and reducing reliance on fossil-fuelled generation.

Wind is an intermittent resource, and this intermittency needs to be carefully factored into the electricity system's operations. However, Mt Cass will also promote a reliable electricity supply through its geographical location. Most of New Zealand's wind generation is in the Manuwatu⁴. Spreading wind farms across New Zealand reduces the risk of disruptions to the electricity supply if the wind is not blowing at a particular location.

Competitive pricing

Fair and efficient pricing of energy should reflect the relative scarcity or abundance of energy resources, and the costs of production, distribution and use. The availability of historically low

³ Ministry of Economic Development, *New Zealand Energy Strategy to 2050*, October 2007, p 72.

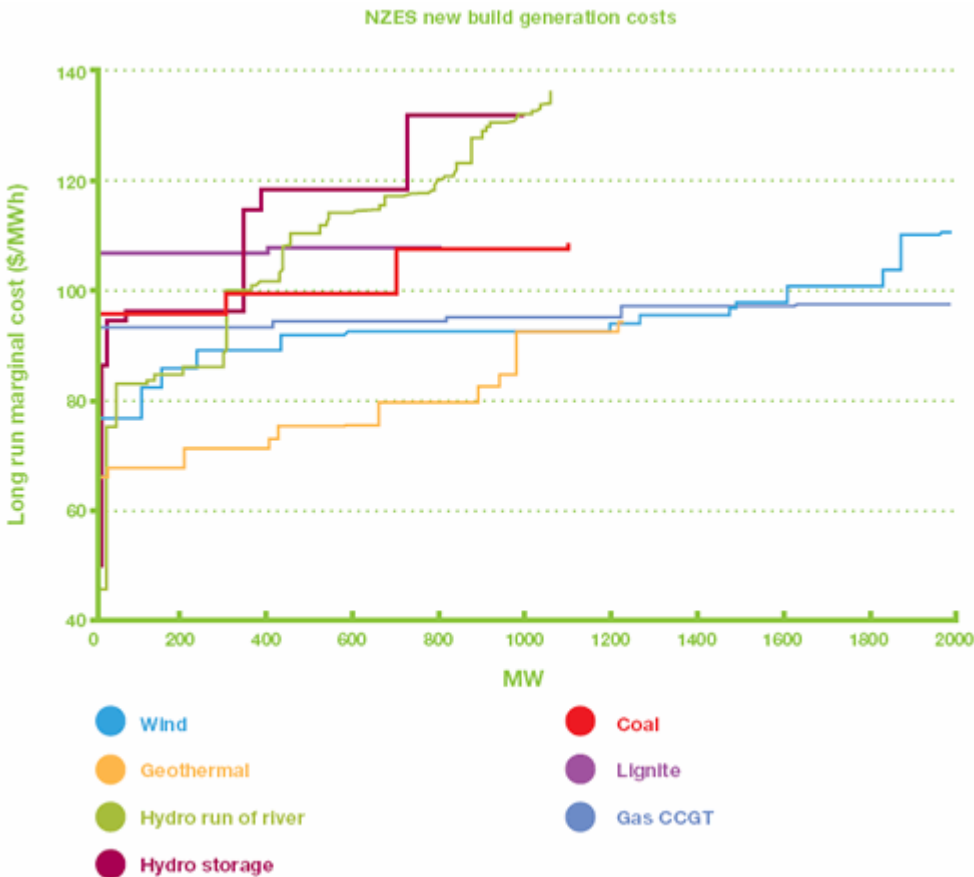
⁴ The Wairarapa and Southland also have existing wind farms, and one is under construction in Wellington.

cost energy has been a key component of economic growth and development, and for maintaining a high standard of living for New Zealanders. It is government policy that energy prices should, in principle, reflect the full costs of supply, including environmental costs.

Part of fair and efficient pricing is ensuring that cost-competitive forms of generation are brought into use in a timely fashion. If lowest cost options are not used, using more expensive sources will place upwards pressure on prices.

The government is intending to introduce an emissions trading scheme (ETS), which will put a price on greenhouse gas emissions from thermal electricity generation. Under an ETS, the electricity sector will face the costs of greenhouse gas emissions from 2010. Electricity generated from fossil fuels will cost more to produce. Figure 1 below shows the estimated costs of fossil fuel and renewable electricity generation for new capacity (assuming medium term emissions price of \$25/tonne of CO₂-e and a \$9/GJ gas price). The graph shows that new geothermal, wind and combined-cycle gas turbine (CCGT) are all available at around the same price. With increasing emissions and gas prices, the economic viability of New Zealand's considerable winder generation resources becomes even more compelling.

Figure 1: Typical costs for new electricity generation⁵



Increases to electricity costs can also be mitigated by having a diverse array of energy sources. Fossil fuels can be subject to price shocks or supply disruptions, which can sharply increase thermal generation costs.

⁵ Ministry of Economic Development, *New Zealand Energy Strategy to 2050*, October 2007, p.38

Maximising energy from renewable resources

As mentioned above, New Zealand relies heavily on hydro power for our electricity, with approximately 60 percent generated from hydro. A further ten percent comes from other renewable and waste heat sources⁶, and the remainder from fossil fuelled plants⁷. New Zealand's electricity generation system can be described as a mixed hydro-thermal system, where hydro energy is used as much as possible, depending on lake levels, and thermal power stations run as necessary to make up the rest of the required supply.

However, New Zealand's energy composition is about to undergo change. The government has set a target of 90 percent electricity to come from renewable sources by 2025. This will require substantial increases in renewable electricity generation.

The Government believes there is no need for new baseload fossil fuel generation in the short to medium term. The government has introduced to the House the Climate Change (Emissions Trading and Renewable Preference) Bill that will restrict the construction of new baseload fossil-fuelled electricity generation for the next ten years, except to the extent necessary to ensure the security of New Zealand's electricity supply. This makes it especially important that consents for new renewable generation are approved.

While New Zealand has a wealth of renewable energy resources, economic and consentable sites are limited. Many of the best hydro sites have already been developed, and resource consent issues exist for the remainder. Geothermal energy is limited to certain parts of New Zealand and is subject to resource sustainability constraints. Bio-energy, using wood or methane collected from landfills, is likely to continue playing a small role. Solar energy is not yet extensively used because of its cost. Harnessing marine energy is a potential future source of energy, assuming robust and cost-effective technologies are developed.

The government considers wind and geothermal energy to be the most likely renewable energy sources to meet growing demand for electricity and to achieve the government's 90 percent renewable electricity target.

New Zealand is ideally situated to generate electricity from wind. Located directly across the path of prevailing westerly winds, many regions of New Zealand have a wind resource that is among the best in the world. There are, however, a finite number of sites that have prime wind resources and are feasible for wind energy development. It is important to maximise our use of these quality resources by consenting projects such as Mt Cass.

Reducing greenhouse gas emissions

The energy system has global and local environmental effects. A key global environmental concern is climate change. Without more effective international action to reduce greenhouse gas emissions, the likely effects of climate change in New Zealand include rising average temperatures, rising sea levels, more frequent extreme weather events and a change in rainfall patterns. Globally, the major greenhouse gas generated by human activity is carbon dioxide from energy use. A number of actions are being undertaken both internationally and nationally to combat climate change, including the emission abatement targets set by the Kyoto Protocol and development of an emission trading scheme.

Greater use of renewable energy resources with lower emissions of greenhouse gases will reduce greenhouse gas emissions, and ultimately the climate change impacts, of New Zealand's energy use.

⁶ Predominately geothermal, with the rest made up of wind and biomass.

⁷ Ministry of Economic Development, *New Zealand Energy Data File*, June 2008.

Mt Cass is an environmentally responsible alternative to fossil-fuelled electricity generation. It will not produce greenhouse gas emissions such as carbon dioxide or air pollutants such as sulphur dioxide during its operation.

If Mt Cass does not go ahead and the electricity came from a gas-fired generator, approximately 90,000 tonnes of carbon dioxide would be released each year. If the electricity came instead from a coal-fired generator, approximately 200,000 tonnes would be released each year. Mt Cass has clear national benefits, as it would help New Zealand meet its international climate change obligations and avoid the economic consequences of not doing so.

Resource Management

In 2002, the Government decided to provide a stronger mandate to councils to encourage energy efficiency and renewable energy generation (CAB Min (02) 27/3A). The result was the passing of the Resource Management (Energy and Climate Change) Amendment Act in 2004 and the inclusion of sections 7(ba), (i) and (j).

The amendment sought greater alignment between local authorities' plans and national energy objectives outlined in the New Zealand Energy Efficiency and Conservation Strategy and climate change policies. The amendment aimed to ensure that local authorities and consent authorities consider the contribution their regions and districts can make to meeting New Zealand's commitments under the United Nations Framework Convention on Climate Change and the Kyoto Protocol.

The amendment to section 7 requires decision-makers to have particular regard to the efficient use of energy, the effects of climate change, and the benefits associated with the use and development of renewable sources of energy. The Ministry considers all of these matters in section 7 to be met by the Mt Cass proposal.

As one of the actions under the New Zealand Energy Strategy, the government is preparing a national policy statement on renewable electricity under the RMA to provide further guidance to consent authorities on the national benefits of renewable electricity. This policy statement is expected to be notified in 2008. While it is under development, it signifies the importance to the government of renewable electricity projects.

4. The Ministry of Economic Development requests that the consent authority make the following decision:

Approve the application for land use consent.

5. The Ministry of Economic Development may wish to be heard in support of its submission, if any clarification of its position is required.

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Attention: Richard Hawke