



Kaukapakapa Area Residents and Ratepayers Association

To: Rodney District Council
Private Bag 500
Orewa

Name of submitter: Kaukapakapa Area Residents and Ratepayers Association
Incorporated (“KARRA”)

1. This is a further submission in support of or in opposition to submissions on Proposed Plan Change 107: Introduction of a Special 18 (Rodney District Thermal Energy Generation Rural Zone) Zone to the Operative Rodney District Plan 1993 and Proposed Variation 89: Introduction of a Special 27 (Rodney District Thermal Energy Generation Rural Zone) Zone to the Proposed Rodney District Plan 2000

Security of Supply

2. KARRA opposes the following submissions in so far that they address the security of electricity supply. A number of the submissions claim that the proposed Rodney Power Station is necessary to ensure security and/or continuation of electricity supply to the North Auckland and Northland areas, and wider New Zealand.

1002/1 Beverley West
1003/1 Betty Drake
1005/1 Maxwell Huddleston
1006/1 Eric West
1015/1 June King
1016/1 Donald & Alison McKenzie
1025/1 Golden Bay Cement
1039/1 H Victor Shankland
1047/1 Federated Farmers
1048/1 Wharehine Contractors
1114/1 MEUG
1115/1 NZ Refining Company
1117/1 GFM Flashbuilt
1126/1 Auckland Regional Public Health Service
1128/1 Te Runanga O Te Taou
1141/1-9 Transpower

1142/1 Ngati Whatua Nga Rima o Kaipara
1146/1 Northland Regional Council
1156/1 Christopher Ross
1160/1 Parakai Developments Stage 2 Ltd Feroz Khan
1171/1 Northland Chamber of Commerce
1172/1 Vector

1143/1 Waitakere City Council (**oppose in part**)
1169/1-6 Auckland Regional Council (**oppose in part**)

3. KARRA's reasons for opposing the above submissions are as follows:

North Auckland & Northland Grid Upgrade

4. KARRA believes that security of supply issues for North Auckland and Northland will be addressed in the short to medium term solely by Transpower's planned network upgrade for the area, scheduled to be completed by 2013.
5. A list of options for investment in the NAaN area was compiled by Transpower, including a Northern Generation Option (Rodney Power Station). Transpower states that an "initial high-level qualitative and quantitative assessment" of sixteen investment options was made against particular criteria. As a result, Transpower identified a short list of three options that it considered equally likely to proceed to proposal stage. The Northern Generation Option (Rodney Power Station) did not meet the criteria and was not short-listed.
6. On 9 May 2008 Transpower presented the Electricity Commission with two revised final proposals for a network upgrade, as solutions to the need to ensure reliable electricity supply to North Auckland and Northland (NAaN) beyond 2013. An Electricity Commission timeline indicates that a final decision on the NAaN proposals will be made by September 2008.
7. It was noted in Transpower's report on the NAaN proposals that new generation simply delays the requirement to reinforce supply into North Auckland and Northland.
8. A media release from Transpower on 17 July 2008 (**attached** to this submission), states that New Zealand can expect over 1,300MW of new generation capacity to be commissioned over the next four years. This figure includes geothermal, wind and hydro generation, with the only new thermal component being Contact Energy's proposed 200MW thermal peaking plant in Stratford.
9. KARRA believes that Transpower's proposed grid upgrade for North Auckland and Northland, due for completion in 2013, will ensure that this extra capacity can be transmitted north.

Transpower Submissions 1141/1-9

10. KARRA notes Transpower's comment in its submission that the proposed facilities for the Rodney Power Station will "*complement*" the National Grid.

Genesis Energy proposes to construct a transmission substation and associated lines as part of the power station development. Obviously Transpower would welcome the construction of new network infrastructure such as that proposed by Genesis Energy. But at no point in its submission does Transpower indicate that the Rodney Power Station or its associated facilities are needed to secure electricity supply, either locally, regionally or nationally.

11. In their submission Transpower refers to the National Policy Statement on Electricity Transmission (NPSET) which came into force on 28 April 2008. KARRA would like to point out that the NPSET deals with *transmission*, not generation, and therefore should only be taken into consideration when assessing the transmission components of Genesis Energy's proposal.
12. Transpower refers to some policies and provisions from the NPSET, including "Policy 1, which requires decision makers to recognise and provide for the national, regional and local benefits of sustainable, secure and efficient electricity transmission." KARRA questions how the local community will directly benefit, given the configuration of the transmission network.

Renewable Generation Opportunities in the North Isthmus

13. KARRA believes that new thermal plant is not necessary and that there are sufficient renewable generation opportunities in the Northern Isthmus.
14. At the end of May Crest Energy received \$1.8 million from the Government's Marine Energy Deployment Fund. Crest are awaiting a decision on their resource consent applications for a 200MW tidal generation project in the Kaipara Harbour. The Northland Regional Council has indicated that a decision will be made by the end of July 2008.
15. In its previous submission, KARRA has referred to Sinclair Knight Mertz reports on renewable generation opportunities in Northland and Auckland. On 11 July 2008 the Electricity Commission published its final report on the Transmission to Enable Renewables (TTER) Project. This report contains information on potential wind, hydro and geothermal generation sites in New Zealand and the transmission investments likely to be needed to support generation from renewable sources.
16. The TTER report included an assessment of the economic wind resource of New Zealand, on a regional basis and considering cost and time distributions. The wind resource was split into three tranches, with Tranche 1 representing areas that will be economic for development in the near future, and Tranches 2 and 3 representing areas that will become economic for development with a larger rise in the value of electricity.
17. As you can see from the TTER map **attached** to this submission, there are significant economic wind resources in Northland and Auckland. The two regions combined are estimated to have a capacity of 420MW in Tranche 1, 2,170MW for Tranche 2 and for 3,520MW for Tranche 3.
18. The Commission has also used the TTER report to analyse the potential grid transmission augmentations required to accommodate new renewable generation.

Planned Generation Projects for New Zealand

19. KARRA strongly believes that new generation projects will more than meet the increasing demand for electricity in New Zealand, which is estimated at between 150 and 200MW every year.
20. The Electricity Commission estimates that over 1,300MW of new generation is likely to be built in the next four years. This figure does not include generation from the proposed Rodney Power Station.
21. In April 2008, the Ministry of Economic Development provided KARRA with a table outlining planned generation projects in New Zealand over 10MW. KARRA has subsequently updated this table as new projects have been announced, and as the status of an individual project changes as it moves through the resource consent process.
22. KARRA believes that over 1,520MW of new generation will be commissioned over the next four years – more than twice what is required to meet the increase in demand. This amount includes over 745MW of geothermal baseload generation. The only thermal component is Contact Energy’s 200MW peaking plant in Stratford, due to be operating by winter 2010.
23. This table is **attached** for your consideration. KARRA will continue to monitor developments in new generation and an updated version of the table will be presented to commissioners prior to the hearing.

Signature: Kaukapakapa Area Residents and
Ratepayers Association Incorporated:

Date:

Address for service:

Telephone:

Email: