Renewable Energy Zone (REZ) Northland Pilot Transpower's Summary of Submissions



From February until April Transpower invited submissions on *Renewable Energy Zones (National Consultation)*, and for a *Renewable Energy Zone Northland Pilot Concept*. The results of the consultation are now <u>published on the Transpower website</u>. Te Kahu o Taonui engaged in consultation with Northpower and Top Energy and made a submission to Transpower. Here are some key points from the submissions summary. Other submitters included the Hokianga Housing Response Collective, Ngati Korokoro Hapu Trust, Patuharakeke Te Iwi Trust Board and Ngati Hine Forestry Trust, Te Runanga o Te Rarawa, and the Waipapa Trust

1. Support for a Northland Pilot

In response to the question *Do you support the development of a REZ in Northland?*, 83% of the 71 responses indicated full or partial support.



From the national consultation there was strong support for Northland as a pilot. Of the 47 responses there were 131 submissions for regions. Those favouring Northland were more than twice as numerous as the second choice (Taranaki).



A clear advantage for Northland is proximity to the Auckland market for export, and the existing high costs of energy here.

2. Support for iwi and community inclusion

Submissions provided strong support for iwi inclusion. For example, the Northpower Top Energy combined submission stated:

The REZ could also provide a significant opportunity for iwi to participate in renewable generation either utilising iwi resources or for iwi investment for the prosperity of their people.

And from the submission from the combined councils:

We are pleased to see that the consultation paper acknowledges that community and tangata whenua consultation is essential. We recommend robust and meaningful consultation with owners of whenua Māori, marae, hapū and iwi.

The Te Runanga o Te Rarawa submission stressed the importance of Te Tiriti in REZ planning.

As a treaty partner government must ring fence capacity within the system for Māori. Without this large corporates could take up on the capacity within the system.

This signals two issues for further discussion. First, generation capacity, estimated at 2000 MW can be compared to a resource such as fishing quota. In the spirit of Te Tiriti, at least 50% could be reserved for Māori ownership. Note that page eight of the Submission Summary document refers to a tender process.

Many respondents supported the use of a tender process following an expression of interest for committing projects in a Renewable Energy Zone. The main reasons provided were benefits of formalising a process that included elements of transparency, fairness and competition. Several respondents agreed that a tender process would be a useful way to coordinate and attract interest, and test both near term and long-term commercial aspirations from interested parties.

A tender process could see organisations with deep pockets line up and lock up generation opportunities. A related concern is land banking, where these organisation purchase land in the designated renewable energy zones.

The second issue is the general principle around community ownership of essential infrastructure, such as water and energy. Electricity generation owned by Māori is much more likely to be retained over the long term. This prevents the alienation of resources that were paid for from the public

purse, but later sold off to commercial (sometimes offshore) interests. It is worthwhile noting that both our lines companies are publicly owned. The submission summary noted (page 11).

It was strongly evident from respondents the need to ensure that the local community, Northland tangata whenua, hapū and iwi, are well engaged through the Renewable Energy Zone process. Similarly, respondents noted the importance of fairness and equity, and to ensure that local stakeholders including iwi are not precluded from participation in the development of a Renewable Energy Zone, for instance, being outbid by large corporate entities or restricted through 'land banking'.

For discussion

Note that Transpower's timeline for 2022/2023 includes the "call for expressions of interest". Should Te Kahu o Taonui advocate for ringfencing of a percentage of generation capacity for Māori?

3. Caution around cultural and environmental values

Some submissions called for caution around sites of environmental and cultural value. Ungrounding electrical cables was presented as a (more expensive) option. Wind farms, in particular, can attract community opposition.

4. Potential sites

Submitters offered some sites of consideration (page 37).

- Ruakākā or Portland, particularly in industrial areas.
- Kaikohe to Dargaville transmission line to provide redundancy for the Kaikohe to Maungatapere line.
- Dargaville and Marsden where renewable energy is located.
- Muriwhenua and Pārengarenga where there is potential for wind and solar.

Front-end Solar Technologies Ltd submitted on behalf of the Hokianga Housing Resource Collective.

Front-end Solar Technologies Ltd (FST) strongly supports the development of trial REZ zones in Northland. We are strongly of the view these are needed all over rural Aotearoa.

FST believes that smart solar-wind-small hydro technology AND the use of smart grid/network elements will be essential to cost-effectively strengthen the power supply system to new and existing papakāinga / Māori housing developments in the Hokianga area.

We are currently working with HHRC to develop an appropriate response to the MBIE "Renewable Energy on Māori Housing" program. We see that a local REZ network in partnership with Top Energy as potentially a winner for such developments.

Appendix one includes network maps to identify potential REZ sites close to substation.

5. Inclusion of southern Te Tai Tokerau

The REZ proposal encompasses the Top Energy and Northpower territories. These are the same as the local government boundaries and split the peninsula in two at the Kaipara. Hapū of Ngāti Wai and Ngāti Whātua may be interested in providing generation too. An advantage is their proximity to the 220 kv line from Auckland.

Next steps

There are a lot of unknowns about the potential for Māori ownership of electricity generation. Wider kōrero would be useful. A hui, either virtual or in person in the next few months to explore some of the possibilities would help to generate more momentum?

Appendix one: Siting generation

These maps show the main transmission lines for Northpower and Top Energy. Locations near substations would be ideal sites for REZs.



Figure 1: Northpower's subtransmission network. From 2021 - 2031 Asset Management Plan, page 58.



Figure 2: Top Energy subtransmission network (Northern Area) From 2021 Asset Management Plan, page 63



Figure 3: Top Energy subtransmission network (Southern Area) From 2021 Asset Management Plan, page 63