

From: [Melanie Foote](#)
To: [Mailroom Mailbox](#)
Subject: Proposed Canterbury Air Regional Plan: Submission by MainPower
Date: Friday, 1 May 2015 4:58:08 p.m.
Attachments: [image001.png](#)
[Air Quality Plan ECan - MainPower - 1 May 15 FINAL.pdf](#)

Please find attached a submission by MainPower

Regards

Melanie



Melanie Foote
Consultant Planner

Resource Management Group
Level 4, 69 Cambridge Terrace
PO Box 908
Christchurch Box Lobby
Christchurch 8140

P 03 943 4112
M 021 959 295
D 03 962 1738
E melanie@rmgroup.co.nz

-
Please note I work Monday, Wednesday and Friday

Disclaimer: This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to which they are addressed. You must not present this message to another party without gaining permission from the sender. If you have received this email in error please notify the sender immediately. Any views expressed in this message are those of the individual sender, except where the sender specifically states them to be the views of Resource Management Group Ltd. Finally, the recipient should check this email and any attachments for the presence of viruses. Resource Management Group Ltd accepts no liability for any damage caused by any virus transmitted by this email.

Before printing think about your responsibility and commitment to the environment. Print double-sided and two pages per sheet whenever possible

RESOURCE MANAGEMENT ACT 1991
SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

TO: Chief Executive
Canterbury Regional Council
PO Box 345
Christchurch 8140

COMMENTS ON: The Proposed Canterbury Air Regional Plan

COMMENTS BY MainPower New Zealand Limited

ADDRESS: MainPower New Zealand Limited
P O Box 346
RANGIORA 7440

INTRODUCTION

1. This is a submission by MainPower in opposition to aspects of the Proposed Canterbury Air Regional Plan.
 2. MainPower owns and operates the electricity distribution network throughout the North Canterbury and Kaikoura area and supplies line services to approximately 33,000 customers. The network covers an area of 11,180 square kilometres. MainPower owns and operates power lines and equipment used to transport power from the national grid to property boundaries.
 3. MainPower is responsible for the construction and maintenance of an efficient and safe electricity network.
 4. MainPower's particular interests in the Proposed Canterbury Regional Air Plan are with the policies and rules dealing with the discharge of contaminants to air from diesel generators.
 5. MainPower undertakes, and will continue to undertake, these activities in accordance with strict Industry Codes of Practice, Environment Canterbury requirements, and Electricity Network Technical Specification standards.
 6. Electricity supply is a lifeline utility¹ as defined in the Civil Defence and Emergency Management Act (The Act). Orion has duties under section 60 of the Act regarding the provision of services during an
-

emergency. Notwithstanding those duties, the maintenance of supply outside of emergency periods is a critical issue for the community.

GENERAL SUBMISSION POINT

7. MainPower seeks that all provisions of the Proposed Canterbury Air Regional Plan are retained, except to the extent that specific changes are made in accordance with the relief sought by MainPower in the balance of this submission and any further submission that Orion may make at the appropriate time. Where specific relief is provided, MainPower would accept words to like effect or otherwise may be required to ensure sustainable management.

THE SPECIFIC SUBMISSIONS

Submission Point 1 – Definitions

Submission

8. The definition of Emergency Electricity Generation needs to recognise the need for allowing for constraints on the network. For example after the Canterbury earthquakes although grid electricity supply was available to some areas it was desirable for operators of generators in such areas to generate their own electricity as this effectively allowed increased power supply to other areas. This resulted in more households having power than would otherwise have been the case. The local electricity distribution network is an interconnected network meaning that power supply can be shifted from one area to another if desired, and as such the definitions should allow for this. Further although electricity supply may be 'available' to a site, it may be desirable from a community perspective for generators to be run at such a site if there were network constraints elsewhere.
9. The definition also needs to recognise meteorological conditions and natural disaster events.

Relief Sought

10. Amend definition of 'Emergency Electricity Generation' as follows:

Means the use of internal combustion generators to generate electricity at times when national grid electricity supply is not available due to a failure of either the national grid or the local distribution network, or when there is a constraint on either the national grid or local distribution network, or where network generation capacity is significantly reduced due to meteorological conditions and a national electricity savings campaign has been implemented, or a natural disaster. This definition applies to the generation of electricity used on site, and not distributed via the grid.

Submission Point 2 - Policies

11. MainPower seeks a new policy to be included to ensure that the electricity network is resilient and that the use of generators in emergency situations is appropriate. Post-earthquake there has been increased recognition of the importance of diesel generation and the importance of resiliency. Diesel generation is an important component of increased resiliency.

Relief Sought

12. Add a new policy suggested wording is as follows:

“Provide for diesel electricity generation to ensure a resilient regional and local electricity network during emergency events.”

Submission Point 3- Rule 7.14

13. Rule 7.14 requires offsetting of PM₁₀ emissions that exceed 2.5µg/m³ (24-hour average) within Clean Air Zones. This rule attempts to implement the requirements of Regulation 17 of the National Environmental Standards for Air Quality (NES). Orion has concerns about this for the following reasons:

- In practice the 2.5µg/m³ threshold is very onerous and as such Orion’s moderate to large generators may likely exceed this threshold.
- This rule applies to the Clean Air Zone boundaries which are bigger than the gazetted airshed boundaries. Under the NES, the offsetting provisions only relate to polluted airsheds. Therefore should Orion need to locate a generator outside the airshed boundary but within the Clean Air Zone boundary it would be captured by this rule.
- The rule does not provide for an exemption for existing consented activities applying to renew their consent with no increase in discharge of PM₁₀. By comparison the NES does provide for this.

Relief Sought

14. MainPower seeks that the condition be reworded in order to be compatible with NES regulation 17 (1) and (2) which states:

17 Certain applications must be declined unless other PM₁₀ discharges reduced

*(1) A consent authority must decline an application for a resource consent (the **proposed consent**) to discharge PM₁₀ if the discharge to be expressly allowed by the consent would be likely, at any time, to increase the concentration of PM₁₀ (calculated as a 24-hour mean under Schedule 1) by more than 2.5 micrograms per cubic metre in any part of a polluted airshed other than the site on which the consent would be exercised.*

(2) However, subclause (1) does not apply if--

*(a) the proposed consent is for the same activity on the same site as another resource consent (the **existing consent**) held by the applicant when the application was made; and*

(b) the amount and rate of PM₁₀ discharge to be expressly allowed by the proposed consent are the same as or less than under the existing consent; and
(c) discharges would occur under the proposed consent only when discharges no longer occur under the existing consent.

Submission Point 4 – Rules 7.17 and 7.18

Submission

15. MainPower oppose Rules 7.17 and 7.18 for the following reasons:

- It is unclear how the following phrase in each rule will be interpreted “...*that will likely result in guideline values...being exceeded...*”. In a polluted airshed where concentrations already exceed the guidelines for PM₁₀ such as Christchurch, any additional contribution to PM₁₀ could be seen as resulting in the guideline being exceeded.
- The non-complying status when read in combination with the advice on Section 3 of the Proposed Canterbury Regional Air Plan. (“*non-complying activities will generally only be granted in exceptional circumstances*”) sets a higher threshold than ordinary applied to non-complying activities under the Resource Management Act.
- The prohibited status removes the ability to carry out a health risk assessment if necessary to demonstrate effects relative to the guidelines that are acceptable.

Relief Sought

16. MainPower seek that the following clause be deleted and that the normal tests under the RMA for non-complying activities be relied upon:

“Non-complying activities require resource consent, which may only be considered for granting under section 104 of the RMA if the requirements of section 104D of the RMA are deemed to have been met. ~~Consents for non-complying activities will generally only be granted in exceptional circumstances~~”

Submission Point 7 – Rule 7.26

Submission

17. MainPower considers that conditions 1 and 2 are very restrictive. After the Canterbury earthquakes Orion installed many generators for extended periods close to sensitive activities to ensure electricity was restored and provided to customers.

Relief Sought

18. MainPower seeks that an exemption clause be inserted with regard to clause (1) and (2) with suggested wording:

Emergency electricity generation activities carried out by electrical distribution companies are exempt from complying with Clause (1) and (2).

HEARING

19. MainPower wishes to be heard in support of its submission. If others make similar submissions, the university may be prepared to consider presenting a joint case with them at any hearing.

SIGNED for on behalf of

MainPower New Zealand Limited

.....

Melanie Foote

Authorised agent for and on behalf of MainPower New Zealand Limited

Dated 1 May 2015

Address for service of Submitter:

MainPower New Zealand Limited

C/- Resource Management Group Limited

P O Box 908

Christchurch Box Lobby

Christchurch 8140

Contact person: Melanie Foote

Telephone: (03) 962 1738

Email: melanie@rmgroup.co.nz