

From: [Melanie Foote](#)
To: [Mailroom Mailbox](#)
Subject: Proposed Canterbury Air Regional Plan: Submission by Orion
Date: Friday, 1 May 2015 5:02:24 p.m.
Attachments: [image001.png](#)
[Air Quality Plan ECan - Orion submission- 1 May 15 FINAL.pdf](#)



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Please note I work Monday, Wednesday and Friday

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From: Melanie Foote
Sent: Friday, 1 May 2015 4:58 p.m.
To: mailroom@ecan.govt.nz
Subject: Proposed Canterbury Air Regional Plan: Submission by MainPower

Please find attached a submission by MainPower

Regards

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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 Orion New Zealand Limited (“Orion”)

ADDRESS: Orion New Zealand Limited
PO Box 13896
Christchurch 8141

INTRODUCTION

1. This is a submission by Orion in opposition to aspects of the Proposed Canterbury Air Regional Plan.
2. Orion own and operate the electrical distribution network between the Waimakariri and Rakaia Rivers and supply line services to around 190,000 customers within Christchurch City and the Selwyn District. Orion’s core purpose is to consistently deliver a safe, secure and cost-effective supply of electricity.
3. Broadly, the electricity network comprises underground cables, overhead lines, substations/transformers/kiosks, electricity structures (poles/pylons, earth rods and associated buildings) and access tracks. Orion is responsible for the installation, maintenance, repair and upgrade of the electricity network.
4. Orion 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.

STATEMENT OF INTEREST

5. Orion’s particular interests in the draft Canterbury Air Regional Plan (the Plan) are with the policies and rules dealing with the discharge of contaminants to air from diesel generators. Some businesses,

including Orion, have generators that maintain electricity supply to their operations during periods when network supply is disrupted. This includes Orion's headquarters in Wairakei Road which is the central hub for managing the operation of the supply network in the region.

6. Typically the need to use diesel generators occurs during:
 - natural hazard events;
 - times when there has been a failure on the Transpower's national transmission grid or Orion's local distribution network;
 - times when electricity network demand is peaking; or
 - possibly, although this has not previously occurred, when the supply of energy to the grid is constrained (e.g. during a severe shortage in hydro storage for electricity generation).

7. 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

8. Orion 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 Orion in the balance of this submission and any further submission that Orion may make at the appropriate time. Where specific relief is provided, Orion would accept words to like effect or otherwise may be required to ensure sustainable management.

THE SPECIFIC SUBMISSIONS

DELETIONS

Submission Point 1 – Definitions

Submission

9. 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
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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.

10. The definition also needs to recognise meteorological conditions and natural disaster events.

Relief Sought

11. 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

12. Orion 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

13. 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

14. Rule 7.14 requires offsetting of PM₁₀ emissions that exceed 2.5 µg/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 2.5 µg/m³ threshold is very onerous and as such Orion's moderate to large generators may 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

15. Orion 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

16. Orion 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

17. Orion 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

18. Orion 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

19. Orion 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

20. Orion 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
Orion New Zealand Limited

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Melanie Foote
Authorised agent for and on behalf of Orion New Zealand Limited

Dated 1 May 2015

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