

**BEFORE THE HEARING COMMISSIONERS APPOINTED BY OTAGO  
REGIONAL COUNCIL**

Under the Resource Management Act 1991

In the matter of the proposed Otago Regional Policy  
Statement 2021 (excluding provisions renotified  
as part of a freshwater planning instrument)

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**STATEMENT OF EVIDENCE OF JACQUELINE MARIE NELSON (CORPORATE  
OVERVIEW) ON BEHALF OF CONTACT ENERGY LIMITED**

23 November 2022

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## 1. QUALIFICATIONS AND EXPERIENCE

- 1.1 My name is **Jacqueline (Jacqui) Marie Nelson**.
- 1.2 I have worked for Contact Energy Limited (**Contact**) for 18 years and have extensive knowledge of Contact's electricity generation activities and operations, both in the Otago Region and throughout Aotearoa New Zealand.
- 1.3 My current role at Contact is Chief Development Officer. I have held this role for 12 months. In this role, I am responsible for leading Contact's renewable electricity generation (**REG**) development and demand growth activities by attracting new industrial demand for renewable electricity (ie transitioning from fossil fuels to renewable electricity), aligned with our Contact26 strategy, to lead the decarbonisation of Aotearoa New Zealand.
- 1.4 Prior to holding this role, I have held the following positions at Contact:
- (a) Corporate Treasurer (December 2004 – Mid-2010);
  - (b) Land & Consenting Manager in Contact's Environmental Team (Mid-2010 – July 2013);
  - (c) Head of Land, Environment and Consenting (July 2013 – 2015);
  - (d) Head of Electricity Markets and Environment (2015 – March 2016);
  - (e) General Manager of Operations (April 2016 – July 2020); and
  - (f) Chief Generation Officer (August 2020 – September 2021). In this role I provided strategic and operational leadership to Contact's operations teams tasked with the safe and optimal operation of Contact's generation sites and management of Contact's LPG infrastructure. I was responsible for the electricity generation and trading, and sustainability functions of the business, which deliver 80% of Contact's EBITDAF,<sup>1</sup> and accountable for the financial management of the company's largest cost budget.
- 1.5 I have an BSc in chemistry from Otago University.

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<sup>1</sup> Earnings before interest, tax, depreciation, amortisation, and changes in fair value of financial instruments.

## 2. SCOPE OF EVIDENCE

2.1 In preparing my evidence I have reviewed at a high-level the relevant parts of:

- (a) the proposed Otago Regional Policy Statement (**proposed RPS**);
- (b) Contact's submissions and further submissions;
- (c) the Otago Regional Council's (**Regional Council's**) section 42A report, including the version showing recommendations from the Regional Council's supplementary evidence and additional supplementary evidence (**section 42A report (October version)**); and
- (d) the statements of evidence prepared by expert witnesses on behalf of Contact.

2.2 This evidence is corporate evidence and not expert evidence. I am authorised by Contact to provide this evidence on its behalf.

2.3 The purpose of my evidence is to provide:

- (a) an overview of Contact, including its operating history, role in the energy industry and its contribution to meeting national electricity demand;
- (b) an overview of Contact's continued progression toward REG and Contact's contribution to the Government's greenhouse gas emissions reduction targets;
- (c) an overview of Contact's sustainability tikanga in its operations;
- (d) an overview of Contact's assets in the Otago Region, being the Clutha Hydro Scheme (**CHS**), including a description of its key features, its current resource consents, its land holdings, how it operates within the broader electricity generation network; and what the future operation of the CHS might be;
- (e) an overview of Contact's investigation of new REG opportunities in the region; and
- (f) a discussion of the key issues and concerns that Contact has with the proposed RPS.

### **3. EXECUTIVE SUMMARY**

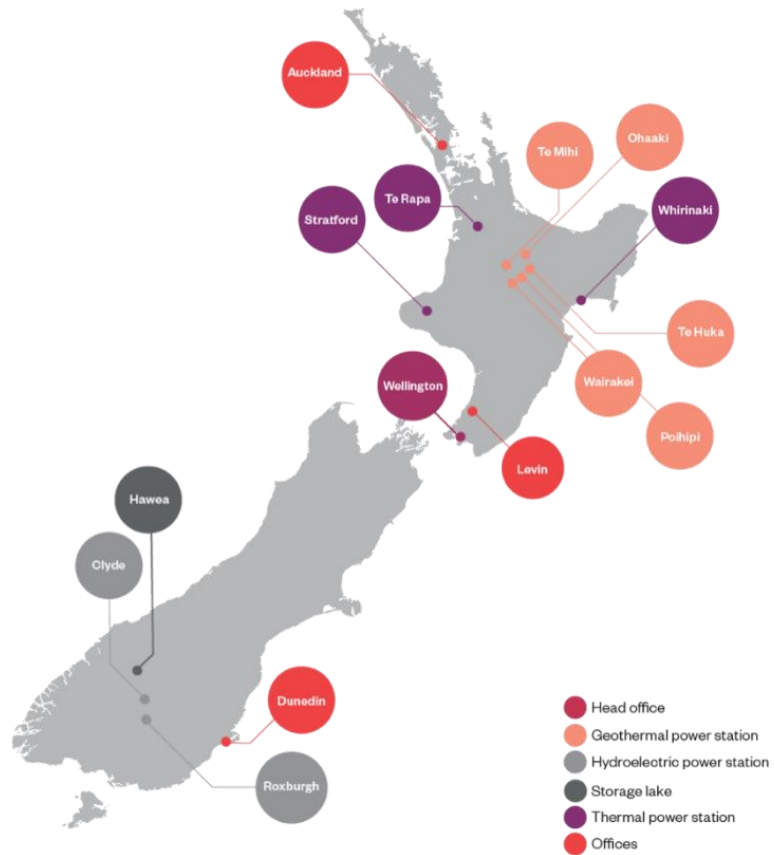
- 3.1 Contact is the second-largest electricity generator/retailer in Aotearoa New Zealand with a flexible and largely renewable portfolio of electricity generation assets. Contact owns and operates 11 generating stations across the country, and generally produces 80-85 percent of its electricity from renewable hydro and geothermal resources.
- 3.2 Contact is committed to contributing to the achievement of Aotearoa New Zealand's climate change targets and assisting the New Zealand Government to meet its climate change goals. To that end, Contact's target is to reduce Scope 1 and 2 greenhouse emissions by 45% compared to a 2018 baseline; and is currently investigating new REG opportunities in the region and New Zealand more broadly.
- 3.3 A commitment to REG is also a core part of Contact's sustainability tikanga; which informs and guides the way we run our business.
- 3.4 Within the region, Contact operates the CHS, which is nationally significant infrastructure and contributes about 10 percent of Aotearoa New Zealand's overall electricity supply and on average 12 percent of Aotearoa New Zealand's REG. Contact wants to ensure that the provisions of the RPS appropriately protect and provide for this critical infrastructure now and in the future.
- 3.5 In terms of the proposed RPS, Contact has a number of concerns, which are addressed in detail in section 9 of this evidence. To address these concerns, Contact supports the amendments to the proposed RPS set out in the expert planning evidence of **Ms Hunter**.

### **4. CONTACT ENERGY LIMITED**

- 4.1 Contact is the second-largest electricity generator/retailer in Aotearoa New Zealand with a flexible and largely renewable portfolio of electricity generation assets. Contact is listed on the New Zealand (NZX) and Australian Stock Exchanges (ASX) and has approximately 63,000 shareholders.
- 4.2 Contact commenced operations in early 1996 when it acquired a portfolio of electricity generation assets from the state-owned electricity generator

ECNZ (Electricity Corporation of New Zealand). These assets included gas and hydro electricity generation assets (including the CHS).

- 4.3 Contact owns and operates 11 generating stations across the country, and generally produces 80-85 percent of its electricity from renewable hydro and geothermal resources.



**Figure 1:** Location of Contact's assets and operations

- 4.4 Contact's contribution to New Zealand's electricity generation is critical to the health and wellbeing of New Zealanders. For example only, Contact supplies electricity to 4,428 "medically dependent" customers, which includes individuals as well as numerous hospitals, retirement villages and medical centres. Contact also supplies 14 councils with a total of 161 connections. These connections to health care and council infrastructure help to support the health and wellbeing of numerous New Zealanders by ensuring that these essential services have the electricity they need to continue to operate.

## 5. RENEWABLE ELECTRICITY GENERATION

- 5.1 In 2008, less than 55 percent of Contact's electricity generation portfolio was from renewable sources. Since then, Contact has led the substitution of almost 3 terawatt-hours (TWh)<sup>2</sup> of higher-carbon thermal generation with REG. This has led to an increase in the proportion of electricity that Contact generates from REG to well over 84 percent (81 percent in the 2021 financial year). This generation provided about 17.5 percent of Aotearoa New Zealand's total REG in 2021.
- 5.2 Contact is committed to contributing to the achievement of Aotearoa New Zealand's climate change targets and assisting the New Zealand Government to meet:
- (a) the emissions reduction target established by the Climate Change Response Act 2002 of reducing New Zealand's greenhouse gas emissions (except biogenic methane) to net zero by 2050;<sup>3</sup>
  - (b) the targets for the energy system set out in the Emissions Reduction Plan, including the Government's aspirational target of transitioning to 100 percent REG by 2030;<sup>4</sup> and
  - (c) the increased demand for REG as a result of decarbonising Aotearoa's industries as set out in the Emissions Reduction Plan.<sup>5</sup>
- 5.3 Contact's strategy focuses on achieving its vision: "*Building a better Aotearoa / New Zealand by leading the decarbonisation of its economy.*" To do this, Contact is (amongst other things) focusing on the development of new REG assets, and the on-going decarbonisation of its current generation portfolio.
- 5.4 Contact's target is to reduce Scope 1 and 2 greenhouse emissions by 45% compared to a 2018 baseline.
- 5.5 Contact is continuing to investigate new REG development opportunities across Aotearoa New Zealand, including new wind, solar developments and the potential for green hydrogen (with its partner Meridian Energy Limited).

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<sup>2</sup> A terawatt-hour is a unit of energy equal to outputting one trillion watts for one hour.

<sup>3</sup> Climate Change Response Act 2002, s 5Q.

<sup>4</sup> *Aotearoa New Zealand's first emissions reduction plan*, page 220.

<sup>5</sup> *Aotearoa New Zealand's first emissions reduction plan*, page 218.

## 6. SUSTAINABILITY

- 6.1 Sustainability is integral to Contact, and Contact is committed to continually improving its environmental performance and reducing its impact on the environment, and the communities within which we operate.
- 6.2 This starts with "*Our Tikanga*" – our commitment to being a responsible organisation. *Our Tikanga* sets out a series of principles and commitments that Contact is guided by in its business, including by:
- (a) striving to minimise any environmental impacts on our customers and communities;
  - (b) ensuring the sustainability of our business;
  - (c) taking care of the environment by looking after our natural and shared resources; and
  - (d) being a good neighbour in the communities where we operate.
- 6.3 We also have the Contact26 strategy, which sets out Contact's plan of action for the five years from 2021-2026, including Contact's commitment to lead the decarbonisation of Aotearoa New Zealand's economy by transitioning our generation portfolio to renewable electricity and developing new renewable electricity generation.
- 6.4 This strategy is grounded in a sustainable and conscious effort to lead the decarbonisation of Aotearoa / New Zealand's economy. We are committed to lowering our carbon emissions, investing in our communities, and treating our customers fairly.
- 6.5 As part of this strategy, we have a comprehensive set of environmental, social and governance targets to track our performance. Our environmental initiatives include:
- (a) a generation portfolio that is 95% renewable by 2025;
  - (b) a reduction of Scope 1 and 2 carbon emissions by 45% by 2026, compared to 2018 when we first set our targets;



- (c) a commitment to displace 1PJ<sup>6</sup> of industrial heat with electricity by 2024;
- (d) planting 20,000 hectares of economically marginal land in Aotearoa New Zealand by 2024 through our partnership with Dryland Carbon. This equates to 30 million tonnes of carbon dioxide removal over the lifetime of the 40-year partnership; and
- (e) planting an additional 100,000 native trees on Contact land and in partnership with others by 2024.

6.6 Contact also seeks to continuously improve its sustainability and environmental performance using the ISO14001:2015 Environmental Management System. This internationally recognised and audited system provides the framework for enabling Contact to go beyond fulfilling its compliance obligations to consider broader environmental and social objectives.

## 7. CONTACT ASSETS IN THE OTAGO REGION (THE CLUTHA HYDRO SCHEME)

7.1 In the Otago region, Contact owns and operates the CHS. The CHS in its entirety has a maximum output of 752 MW with an average annual output of about 3,900 GWh. As **Mr Hunt** observes, this is roughly the same scale as the total consumption of all South Island residential electricity consumers.<sup>7</sup>

7.2 The CHS contributes about 10 percent of Aotearoa New Zealand's overall electricity supply and on average 12 percent of Aotearoa New Zealand's REG. It is also a source of controllable energy which helps in balancing the overall electricity system (as discussed further in the evidence of **Mr Hunt**)<sup>8</sup> and from the perspective of Contact's generation portfolio discussed in my evidence below.

7.3 The CHS is operated as one integrated / interdependent management unit from Clyde. There are three primary structures associated with the CHS, being the Hāwea Dam (and associated Gladstone Gap Stopbank and

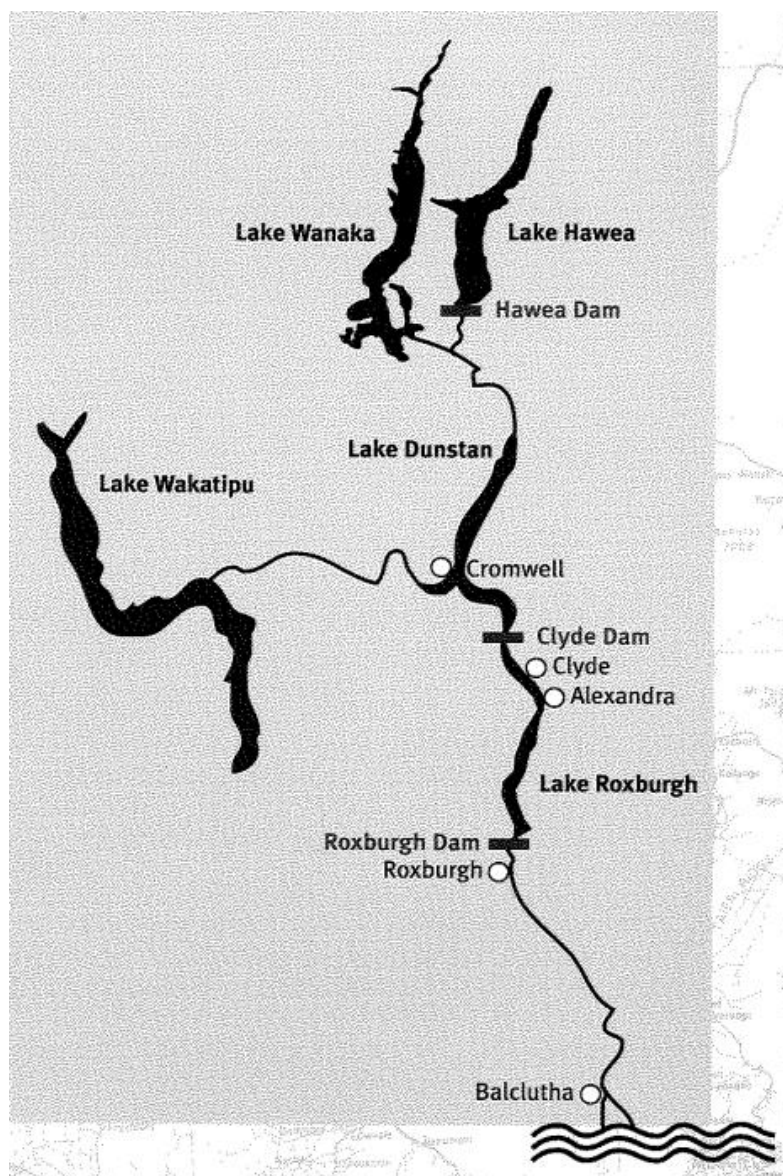
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<sup>6</sup> 1PJ is approximately 277GWh. This is the equivalent of servicing 35,000 houses for 1 year and 4.5 million Tesla car charges. By way of further context, in terms of large electricity users, Alliance – Meat uses a total of 96GWh of heat per year which amounts to approximately 35% of 1PJ.

<sup>7</sup> Hunt EIC, para 4.6.

<sup>8</sup> Hunt EIC, from para 8.5.

Spillway), the Clyde Dam and the Roxburgh Dam. The relationship between these structures is described in the following paragraphs.



**Figure 2:** Location of the Clutha Hydro Scheme and key features

### **The Hāwea Dam Control Structure**

- 7.4 A control structure was built at Lake Hāwea between 1954 and 1958 to coincide with the commissioning of the Roxburgh Dam. The Hāwea Dam is a 30 metre high earth-filled structure that is designed to give an effective control of the lake level over a range of 21.65m. Prior to the construction of the control structure, the mean lake level was 327.7m above sea level. Since 1960 the lake has generally operated at a level of 342.9m.
- 7.5 There is no electricity generation plant at Hāwea. The role of the dam is simply to control the level of Lake Hāwea and therefore provide storage for

the Roxburgh and Clyde plants downstream. The dam does, however, also have a role in providing flood control downstream.



**Figure 3: The Hāwea Dam**

- 7.6 The Gladstone Gap is a natural feature that forms a low point in the moraine of the southern shoreline of Lake Hāwea. As part of the construction of the Hāwea Dam, a stop bank (shown in red at Figure 4 below) with its crest below that of the Dam was constructed across this feature. The stop bank serves to dam Lake Hāwea when the lake is at extremely high levels and to act as the only spillway for the Dam and prevent it from overtopping.



**Figure 4:** The Gladstone Gap Stopbank and Spillway

### **The Clyde Dam**

- 7.7 The Clyde Dam was constructed by the Crown in the 1980s. Whilst its construction was completed in 1990, the filling of Te Wairere / Lake Dunstan behind it, and its commissioning were delayed until 1992 and 1993, respectively. This is because work was required to stabilise a large number of ancient landslides in the Cromwell Gorge.
- 7.8 The Clyde Dam is the largest concrete gravity dam in Aotearoa New Zealand. It is 100 metres high and has a 490 metre wide crest. The capacity of the Clyde Dam is 432 MW.





**Figure 5:** The Clyde Dam

- 7.9 Te Wairere / Lake Dunstan has an area of about 26 square kilometres that encompasses the Cromwell Gorge and the Kawarau and Clutha Arms. The lake has been operating at a range of one metre which effectively means that the power station largely uses the “run of the river”. However, this flow is supplemented using storage at Lake Hāwea.



**Figure 6:** Te Wairere / Lake Dunstan

## The Roxburgh Dam

- 7.10 The Roxburgh Dam is the oldest of the three structures that form the CHS. It was constructed in the 1950s and commissioned in 1956. It is a substantial structure with a height of about 78 metres and a crest length of 358 metres. The power station has a capacity of 320 MW.



**Figure 7:** The Roxburgh Dam

- 7.11 As a result of the dam's construction, Lake Roxburgh was formed behind the dam. It has an area of six square kilometres and extends upstream from the Roxburgh Dam to the Clyde Dam.



**Figure 8:** Lake Roxburgh, looking towards Alexandra

**Contact's land holdings and the "operating easement"**

- 7.12 Contact has landholdings within the catchment but they are small compared to the size of the lakes and river edges that it has rights over.
- 7.13 Contact owns the core CHS assets; its dams at Lake Hāwea (the control structure and Gladstone Gap), Clyde Dam and Roxburgh Dam and some land immediately adjacent to them. Contact also owns the landslide buttresses at Lake Dunstan, and pockets of land at Lowburn/Wanaka Road near Lake Dunstan, Waenga Station in the Cromwell Gorge and in and around the Manuherikia River. These land holdings amount to about 2,542 hectares (Waenga Station accounts for 2,242 hectares of this). By way of comparison Lake Dunstan covers 2,948 hectares; Lake Roxburgh covers 1,086 hectares and Lake Hāwea covers 15,600 hectares.<sup>9</sup>
- 7.14 Contact's right to store water in Lakes Dunstan, Roxburgh and Hāwea and the Hāwea River to its confluence with the Clutha River/Mata-au is created and controlled by an easement granted to it by the Crown when the power generation assets were sold to it. That right is referred to as an "Operating Easement".

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<sup>9</sup> These are all approximate values.

7.15 The Operating Easement is a series of easements for each of the lakes and relevant sections of the Hāwea/Clutha/Kawarau Rivers. Under the easements, Contact's rights include:

- (a) the right to store water on the land described;
- (b) the right to install and operate electricity works from time to time on that land; and
- (c) ancillary rights including the lawful ability to store sediment on the land subject to the easement.

### Current resource consents

7.16 The Hāwea, Clyde and Roxburgh Dams were all established prior to the enactment of the Resource Management Act 1991 (**RMA**). In 2001, Contact lodged resource consent applications to continue operating these three structures. **Table 1** below sets out a list of the resource consents applied for and held by Contact in relation to the operation of the CHS.

**Table 1:** Resource consents applied for and held by Contact in relation to the operation of the CHS

|                                |   |
|--------------------------------|---|
| <b>Hāwea Dam</b>               | Water permit to dam (2001.383)          |
|                                | Water permit to discharge (2001.389)    |
|                                | Discharge permit (2001.392)             |
|                                | Discharge permit (2001.395)             |
|                                | Water permit to take and use (2001.399) |
| <b>Gladstone Gap Stop Bank</b> | Water permit to dam (2001.384)          |
| <b>Clyde Dam</b>               | Water permit to dam (2001.385)          |
|                                | Water permit to divert (2001.387)       |
|                                | Water permit to take and use (2001.390) |
|                                | Discharge permit (2001.393)             |
|                                | Discharge permit (2001.396)             |
| <b>Roxburgh Dam</b>            | Water permit to dam (2001.386)          |
|                                | Water permit to divert (2001.388)       |
|                                | Water permit to take and use (2001.391) |
|                                | Discharge permit (2001.394)             |
|                                | Discharge permit (2001.397)             |



- 7.17 The consents were granted by independent Commissioners appointed by the Regional Council on 10 September 2003, subject to conditions. Contact, and a number of other submitters, appealed the decision to the Environment Court. In *Alexandra District Flood Action Society Inc v Otago Regional Council*,<sup>10</sup> the Court granted the consents, again subject to conditions. The consents have 35 year terms and expire on 23 May 2042.
- 7.18 Combined, these consents regulate the way in which Contact can physically operate the CHS. They are therefore integral to Contact's ability to continue to supply up to 10 percent of Aotearoa New Zealand's electricity.
- 7.19 The consents for Hāwea and Roxburgh Dams provide specific conditions which require Contact to provide for fish passage and habitat, including through the development and implementation of monitoring and mitigation programmes. As part of those conditions, Contact has been developing and implementing monitoring and mitigation programmes, including its "trap and transfer" system, to support the upstream and downstream passage of fish in the CHS. Contact is committed to continuously improving upstream and downstream fish passage within the CHS.

### **How the CHS operates within the broader electricity generation network**

- 7.20 The CHS must be operated as an integrated part of Aotearoa New Zealand's total electricity generation.
- 7.21 As explained in the evidence of **Mr Hunt**, the CHS is a source of controllable energy (particularly in the short term) which helps in balancing the overall electricity system.<sup>11</sup> Hydro-electricity generation with storage capacity can offer flexibility and speed of response, which is not the case for wind and/or solar plants.
- 7.22 The demand for electricity varies over time (i.e. days and seasons) and generation (supply) must precisely match demand. Swings in demand can be large. Therefore, hydro schemes ideally need to be able to respond not only to daily changes in demand, but also to immediate fluctuations in

<sup>10</sup> *Alexandra District Flood Action Society Inc v Otago Regional Council* Environment Court C067, 24 May 2007. See also the first interim decision C102/2005, issued 21 July 2005 and second interim decision C34/2007, issued 29 March 2007.

<sup>11</sup> Hunt EIC, from para 8.5.

demand and overall system security. This is enabled through access to water storage. Therefore, water storage is a critical component of hydro-electricity schemes.

- 7.23 There is also an operational constraint (required by consent conditions) due to the requirement to operate the Roxburgh and Clyde Dams in conjunction with one another. For example, to ensure Lake Roxburgh's levels are within the limited consented range, roughly the same flow must pass through the dams.
- 7.24 Each day decisions are made as to how Contact will generate electricity to meet its current and future electricity supply commitments and market demand while complying with its consents to operate.
- 7.25 At the same time, Contact must manage its storage and fuel use to avoid risks associated with disruptions to supply or meeting its commitments. This means generation opportunities at CHS need to be carefully managed, particularly given the nature of its run-of-river system, and short-term storage at Lake Hāwea.
- 7.26 As noted in **Mr Hunt's** evidence, the CHS plays a critical role in meeting the electricity demands of New Zealand (including through its intraday and intraweek flexibility) and therefore contributes significantly to the country's economic and social well-being.

### **Future operation of the CHS**

- 7.27 The CHS forms a key component of both Contact's REG portfolio, and Aotearoa / New Zealand's at large. As an existing physical asset that contributes an average of 12 percent of the country's renewable generation, it is critical that the efficient operation of the CHS continues to be both protected and enabled.
- 7.28 Contact does not have any immediate plans to make significant upgrades or undertake further development of the CHS. Ongoing minor upgrading and repair work will occur and may include (for example) replacing turbines and managing the visual and recreational impacts of sediment deposition in the hydro lakes.
- 7.29 Programmes to improve the operability and sustainability of the system are always being considered in the light of electricity demand, the sustainable use of the natural resource and the cultural values and wāhi tapū of hapū.

For example, we are currently working with Kai Tahu and the National Institute of Water and Atmosphere to improve native fish passage along the Clutha / Mata-au and seeking resource consent to undertake works in the Bannockburn Inlet to maintain the bed profile to enable its on-going recreational use.

7.30 From a social and economic perspective, Contact employs almost 100 people at the CHS, and looks to local industry to provide ongoing maintenance support across all aspects of the system (ie. engineering, civil works, building and resource management support). Each year we invest in, and support, several local charities and events such as the Alexandra Blossom Festival and the Contact Epic Race.

## 8. INVESTIGATING NEW RENEWABLE ELECTRICITY GENERATION DEVELOPMENT

8.1 As I have explained above, Contact is committed to contributing to the achievement of Aotearoa New Zealand's climate change targets and assisting the New Zealand Government to meet:

- (a) the emissions reduction target established by the Climate Change Response Act 2002 of reducing New Zealand's greenhouse gas emissions (except biogenic methane) to net zero by 2050;<sup>12</sup>
- (b) the targets for the energy system set out in the Emissions Reduction Plan, including the Government's aspirational target of transitioning to 100 percent REG by 2030;<sup>13</sup> and
- (c) the increased demand for REG as a result of decarbonising Aotearoa's industries as set out in the Emissions Reduction Plan.<sup>14</sup>

8.2 **Mr Hunt** has commented further on these commitments in his evidence and noted that achieving these goals will require unprecedented development of new generation.<sup>15</sup> Mr Hunt estimates around 1,100 GWh of new REG will be required on average every year until 2050. This is huge – as Mr Hunt notes, it is roughly equivalent to adding a new set of Clyde and Roxburgh hydro stations to the electricity system every 3.5 years until 2050. Mr Hunt

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<sup>12</sup> Climate Change Response Act 2002, s 5Q.

<sup>13</sup> *Aotearoa New Zealand's first emissions reduction plan*, page 220.

<sup>14</sup> *Aotearoa New Zealand's first emissions reduction plan*, page 218.

<sup>15</sup> Hunt EIC, para 6.15.

has also explained the increased need for flexible supply and diversity of generation sources.<sup>16</sup>

- 8.3 Contact is committed to helping the government achieve these commitments and accordingly has embarked on a significant project to investigate suitable sites for new wind and solar electricity generation throughout New Zealand. This includes investigation of several sites within the Otago region. However, if the planning framework becomes too restrictive in this region, Contact may decide to focus on alternative sites in other regions.

## **9. CONTACT'S KEY ISSUES AND CONCERNS WITH THE PROPOSED RPS**

- 9.1 Contact supports the intention and purpose of the proposed RPS to promote positive sustainable change and a flourishing Otago community.

- 9.2 Contact's submissions and further submissions on the proposed RPS centre around the following key concerns:

- (a) providing a policy framework that appropriately recognises and prioritises REG and its role in achieving Aotearoa New Zealand's emissions reduction targets and in providing for wellbeing;
- (b) recognition that new large-scale REG operations, like wind farms, will, due to functional, technical and locational constraints have unavoidable (and likely significant) impacts on the environment and will not be 'effects-free' – particularly at the local level;
- (c) providing a realistic consenting pathway for new REG development and upgrades, including access to the full effects management hierarchy;
- (d) protecting significant REG assets such as the CHS and ensuring that its operation, maintenance and minor upgrading is provided for;
- (e) recognising that the environment of the CHS is significantly modified and cannot realistically be returned to a "natural" state; and
- (f) protecting the CHS and any future REG assets from potential reverse sensitivity effects.

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<sup>16</sup> Hunt EIC, from para 6.18.

- 9.3 These concerns are addressed in detail in the other evidence provided on behalf of Contact, especially by **Ms Hunter**. The key points I would like to make in relation to the proposed provisions are:
- (a) the development of the CHS has had, and will continue to have over its life, a significant impact on the Clutha catchment and its environment as explained in more detail in the evidence of **Dr Keesing** and **Messrs Coombs and Foster**;
  - (b) these impacts are irreversible and extend well beyond the large-scale dam structures and their respective storage lakes – the CHS is of a scale that it has fundamentally altered the nature of the catchment and the development around it. Therefore, provisions that seek for waterways to be returned to a "natural" state are unlikely to be practical or sensible in respect of the Clutha and CHS;
  - (c) if climate change is a significant national issue (which I believe it is), and if it is an urgent issue to address (which I believe it is) then for New Zealand is to meet its climate change commitments, and decarbonise its economy, documents such as the RPS must prioritise climate change (especially greenhouse gas reductions);
  - (d) protecting existing, and enabling new, REG developments are key for New Zealand to reduce greenhouse gas emissions and to do its part in avoiding or reducing the effects of climate change on New Zealand (both on people and on our natural resources);
  - (e) Contact does not seek a 'free ride' for such activities, effects must be appropriately managed and in some cases development at a particular site may not be appropriate but what is critical is that projects can be assessed, both for their benefits and costs, through a consenting process and not prevented at a policy level as set out in **Ms Hunter's** evidence; and
  - (f) the proposed RPS ignores the significance of the implications of climate change to New Zealand and the region and the critical role that REG provides in reducing our emissions by failing to appropriately protect existing and enable new REG activities as explained further in **Ms Hunter's** evidence.

9.4 For all of these reasons, and the further reasons set out in the expert evidence provided on behalf of Contact, Contact prefers the amendments that Ms Hunter has recommended and set out in her evidence.

**Jacqueline Marie Nelson**

**23 November 2022**