

**BEFORE A FRESHWATER PANEL
CONSTITUTED UNDER THE
RESOURCE MANAGEMENT ACT 1991**

IN THE MATTER of the freshwater components of the
Proposed Otago Regional Policy
Statement

AND

IN THE MATTER of submission and further submissions by
Meridian Energy Limited

**MEMORANDUM NO. 2 FOR MERIDIAN ENERGY LIMITED
CONCERNING PARAGRAPH [4] OF THE NOTICE OF HEARING
DATED 30 NOVEMBER 2022**

DATED 6th DECEMBER 2022

Instructing counsel:

Humphrey Tapper
In-house counsel
287/293 Durham Street North
Christchurch Central
Christchurch 8013
Ph: 03 357 9767
Email: humphrey.tapper@meridianenergy.co.nz

Counsel acting:

John Maassen
— BARRISTER —

✉ john@johnmaassen.com
🌐 johnmaassen.com
☎ 04 914 1050
📠 04 473 3179

MAY IT PLEASE THE PANEL:

- [1] In paragraph [4] of the Panel's notice of hearing dated 30 November 2022, the Panel allowed submitters the opportunity to seek leave to address the Panel on multiple topics/chapters in one hearing slot.
- [2] MEL seeks leave to present its submissions and evidence on several topics/chapters of PORPS collectively in the week of 13 March to 17 March 2023 (Energy etc.).
- [3] The reasons for MEL's request are the following:
 - (a) MEL's case has evolved with other generators into a joint package of provisions that benefit from consideration holistically to achieve relevant national policy.
 - (b) The generators' evidence focuses on a distinct Energy section addressing the significant environmental issues of renewable energy and climate change.
 - (c) The 'package' centres on one type of resource use purpose with a new Energy section with ancillary and supporting provisions in other locations, including the Integrated Management chapter. Consequently, hearing Meridian's evidence and legal submissions collectively in one hearing slot is efficient.
- [4] Contact Energy Ltd and Manawa Energy Ltd may choose to make appearances on other chapters reflecting different interests in the region. All three generators, however, seek a time allocation close to each other in the week of 13 March to 17 March 2023 because that is the most efficient and impactful way to convey their collaborative work on the key Energy chapter.
- [5] Accordingly, MEL seeks the following directions:
 - (a) MEL may present its evidence and submissions on various chapters collectively in one slot in the week of 13 March to 17 March 2023 (Energy etc.).

- (b) MEL's time for giving evidence and submissions in the week of 13 March to 17 March 2023 (Energy etc.) is to be scheduled alongside other generators promoting the same package of provisions i.e. Contact Energy Ltd and Manawa Energy Ltd.



J W Maassen
Counsel for Meridian Energy Limited