

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

UNDER The Resource Management Act
1991 (**Act** or **RMA**)

IN THE MATTER of an original submission on the
Proposed Regional Policy
Statement for Otago 2021
(**PORPS**)

BETWEEN **AURORA ENERGY LIMITED**

Submitter 0315

NETWORK WAITAKI LIMITED

Submitter 0320

POWERNET LIMITED

Submitter 0511

AND **OTAGO REGIONAL COUNCIL**

Local Authority

**SUBMISSIONS OF COUNSEL ON BEHALF OF AURORA ENERGY
LIMITED, NETWORK WAITAKI LIMITED AND POWERNET LIMITED**



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MAY IT PLEASE THE HEARING PANEL:

1. Introduction

1.1 These submissions are presented on behalf of the three primary electricity distribution businesses (**EDBs**) that operate in Otago:

- (a) Aurora Energy Limited (**Aurora Energy**).
- (b) Network Waitaki Limited (**Network Waitaki**).
- (c) PowerNet Limited (**PowerNet**).

1.2 The purpose of these submissions is to:

- (a) Provide an introduction to the EDBs and why they are involved in PORPS as well as to introduce the evidence lodged by the EDBs and their approach to this hearing.
- (b) Explain the regional significance of parts of the electricity distribution network and the issues facing future development of the network, insofar as it is relevant to the relief subject to this hearing appearance.

1.3 For convenience, enclosed as **Appendix 1** is a summary of the relief which is the subject of this hearing. The balance has been sought to be addressed next month with the EIT Chapter.

2. Introduction to Electricity Distribution Businesses

2.1 The EDBs are in the business of the operation, maintenance, development and upgrade of their respective electricity distribution networks. As defined, their network comprises:¹

the lines and associated equipment that are used for conveying electricity and are operated by a business engaged in the distribution of electricity; but does not include lines and associated equipment that are part of the national grid.

2.2 Distribution is only one of 3 primary systems which convey electricity across a network. Those systems are summarised below:

¹ Definition of Distribution Network.

- (a) Electricity **Generation**, primarily renewable in Otago, and generated by Manawa Energy, Pioneer Energy, Contact Energy and Meridian Energy.
- (b) Electricity **Transmission** through the National Grid. This transmits electricity from generation sources to Grid-Exit Points (**GXPs**) typically at a voltage of 110kV or greater.
- (c) Electricity **Distribution**, which conveys electricity from GXPs to consumers and operating at three distinct voltages:
 - (i) Electricity Sub-Transmission (**ESTI**): operating at 66 kV (minority) and 33 kV.
 - (ii) High Voltage (**HV**) Distribution: generally operating at 11 kV in Central Otago and 6.6 kV in Dunedin.
 - (iii) Low voltage (**LV**): operating at 400 V three phase or 230 V single phase typically used for consumer connections.

2.3 Generation, transmission and distribution operate as a single electricity system. Neither can achieve the end goal of facilitating electricity to a customer without the other.

2.4 Parties representing all three systems have lodged submissions and will be (or have already) presented submissions and evidence before this panel.

Aurora Energy

2.5 Aurora Energy is the largest network operating in Otago and supplies approximately 92,000 customers across two non-contiguous networks.² The first network is at Dunedin which distributes electricity from two grid-exit points at Halfway Bush and South Dunedin³ as well as from the Waipori Falls Dam operated by Pioneer Energy.

2.6 The second network spans both Central Otago and the Queenstown Lakes District servicing urban areas such as Cromwell, Alexandra, Clyde, Wānaka, Queenstown, Glenorchy, and various small towns in

² Evidence of Joanne Dowd at 4.1

³ Evidence of Joanne Dowd at 4.2

between. Electricity is supplied from three grid-exit points at Cromwell, Clyde and Frankton as well as directly feeding from the Roaring Meg power plant located in the Kawarau Gorge.

PowerNet

- 2.7 PowerNet is a network management company which is contracted by OtagoNet Joint Venture to maintain and operate its network. That network is largely to the north and south of Dunedin, servicing towns south from Waihola, Balclutha, Lawrence and Clinton, and towns to the north of Dunedin including Waitati, Palmerston, Macrae Mine and Ranfurly.

Network Waitaki

- 2.8 Network Waitaki is, by comparison to Aurora Energy and PowerNet, the smaller of the operators in terms of customer base. However, their role is no less important to their customers which are primarily in north Otago (and parts of the Canterbury region) with most located in Oamaru.

3. EDBs involvement in the PORPS

- 3.1 There is no direct recognition of electricity distribution in the RMA framework. This is unlike electricity generation and transmission which are both recognised through respective national policy statements⁴ as being infrastructure of national or regional significance. By contrast, there are no parts of the electricity distribution which automatically attain regional significance.
- 3.2 However, in the Partially Operative Regional Policy Statement, the Electricity Sub-Transmission Network was recognised as regionally significant, and that has been pulled through into PORPS.
- 3.3 ESTI refers to those parts of the distribution network which convey electricity between Grid-Exit Points and Zone Substations. They are the most important lines in the network as they supply electricity to both the HV and LV network.

⁴ NPS Electricity Transmission and NPS Renewable Electricity Generation.

- 3.4 EDBs are indirectly recognised in the RPS as they operate a lifeline utility as defined by the Civil Defence Emergency Management Act 2002.⁵ The definition focusses on the entity as opposed to the nature of the infrastructure, so by consequence all parts of the electricity network are included.
- 3.5 The EDBs networks spans the largest distance of all electricity systems in Otago. Covering such vast distances, the EDBs encounter all manner of sensitive environments that have varying forms of landscape protections in the PORPS. This is likely to be the case with many infrastructure providers. The key difference, however, is the frequency that the electricity network crosses over those environments.
- 3.6 Operating in these environments is a constant challenge that is built into how EDBs operate. However, the sensitivity of those environments creates a tension with the requirements of the EDBs to deliver electricity supply to the community, without which the generation and transmission elements of the energy sector would not achieve their end purpose.
- 3.7 Aurora Energy was involved in the development of the Partially Operative Regional Policy Statement 2019. While that process was long and fraught with tension between stakeholders a good outcome was reached. This was only possible following appeals to the Environment Court and mediation between the parties. The discussions were useful for a tangential purpose, allowing the infrastructure submitters to understand each other's interests and views. For current purposes it has led to alignment between the electricity sector (in part) with the aim of establishing an energy focussed section of the EIT Chapter in the PORPS. That will be the focus of the next hearing attendance but is worthwhile highlighting now because this foreshadows the EDBs substantive relief to be addressed in the week of 13 March.

4. Submissions and Evidence

- 4.1 The EDBs lodged separate original submissions on the PORPS in September 2021 and attended informal discussions with Otago Regional Council and other parties. Recognising their interests and relief sought were largely aligned, the EDBs agreed to prepare a joint

⁵ Civil Defence Emergency Management Act 2002, Schedule 1 Lifeline utilities.

case which advanced an approach that was focussed on electricity distribution. Additionally, the EDBs have met with the Electricity Generators informally to discuss their respective relief with a view of advancing a focussed Chapter pertaining to energy/electricity infrastructure.

- 4.2 The EDBs case is supported by the joint expert planning evidence of Ms Megan Justice which has advanced a comprehensive suite of changes to the PORPS in support of the interests and needs of the EDBs.
- 4.3 In addition to joint planning evidence, each EDB has lodged evidence outlining and explaining their respective networks; the current challenges they face in their unique environments; and future investment in their networks.
- 4.4 The evidence of Mr Paterson has been lodged partly on a joint basis. This recognises that the Aurora Energy network is, from a technical or engineering perspective, the same as Network Waitaki and PowerNet. Mr Zwies and Mr Watson rely on parts of Mr Paterson's evidence for that reason.
- 4.5 The following evidence has been lodged:
 - (a) Ms Megan Justice, Planner.
 - (b) Mr David Paterson, Primary Systems Manager at Aurora Energy.
 - (c) Ms Joanne Dowd, Regulatory Assurance Manager at Aurora Energy.
 - (d) Mr Shane Watson, General Manager Network at Network Waitaki.
 - (e) Mr Mark Zwies, Engineering Manager (Networks) at PowerNet.
- 4.6 Messrs Watson and Zwies will appear at the EDBs second appearance in March when the EIT Chapter is discussed.
- 4.7 These submissions traverse the following topics and provisions:
 - (a) Definitions / Interpretation:
 - (i) Definition of Significant Electricity Distribution Infrastructure.

- (ii) Definition of Regionally Significant Infrastructure.
- (b) SRMR – Significant Resource Management Issues for the Region
 - (i) Amendment to SRMR-I1.
 - (ii) New SRMR relevant to Electricity Distribution
- (c) IM – Integrated Management
 - (i) IM-P1 - Integrated approach to decision-making
 - (ii) IM-P14 - Human impact

5. Definitions / Interpretation

- 5.1 The EDBs sought a range of changes to definitions in their submissions. The focus now is only on two definitions: Significant Electricity Distribution Infrastructure (**SEDI**) and Regionally Significant Infrastructure (**RSI**). The two issues are linked because the EDBs seek to recognise SEDI as RSI.
- 5.2 The s 42A Report Author has recommended the definition under the PORPS19 be pulled through into the PORPS. This approach is supported in evidence by the EDBs save for removing reference to “identified” in a District Plan which Ms Justice considers is indicative of a method, as opposed to a definition. A consequential amendment to a method is proposed accordingly.
- 5.3 The bigger issue is the recognition of SEDI as RSI. This was not achieved under the PORPS. Although this Counsel was not present in those discussions, it is understood that the issue with doing so was not to dispute the importance of those lines, but rather the expansiveness of the definition which potentially could include all lines in the region simply as a consequence of lines serving more than 700 people. This approach was refined in the context of the Queenstown Lakes District Council Proposed District Plan review in which Aurora Energy identified those particular lines of concern, and limited any policy recognition to only those lines, compared with all other lines that meet the definition.
- 5.4 The definition advanced is deliberately broad for the purpose of the PORPS as it provides a framework through which the importance of

particular lines can be tested in a District Plan review framework. This is pulled through with the proposed method, as opposed to the definition itself.

- 5.5 The particular lines that were identified by Aurora Energy typically fall into the category of being a single line which services an isolated community of which there is no other source of supply. This increases the risk for supply disruption, many of which have been publicised in local media over the last few years.
- 5.6 There is no particular threshold for what regionally significant infrastructure is. Clearly it must have significance to the region, but to what extent is uncertain. The approach taken by Canterbury, Southland and Waikato has recognised the threshold as being low and include the entirety of the electricity distribution network as regionally significant infrastructure.
- 5.7 The PORPS contains a similarly low threshold with respect to community drinking water abstraction and community stormwater, wastewater and sewage collection. Counsel submits that the provision of electricity is an equivalent need of regional significance.

6. SRMR – Significant Resource Management Issues for the Region

- 6.1 A regional policy statement must state the significant resource management issues for the region.⁶ The s 32 Report states that “Issues are existing or potential problems that must be resolved to promote the purpose of the RMA”.⁷ The s 42A Report Author goes further to say that the approach in the PORPS approach is to include *the most* significant resource management issues facing the Otago region.⁸ This assumes an addition layer of importance, beyond simply regional significance that is overly constrained.
- 6.2 There is no requirement to assess issues in accordance with s 32 of the RMA. That is a striking omission considering the importance of issues in the creation, implementation and interpretation (if necessary) of lower order provisions. Despite a legislative requirement, Counsel submits

⁶ Resource Management Act, s 61(1)(a).

⁷ Section 32 Evaluation Report – Proposed Otago Regional Policy Statement 2021, May 2021 at 3, Page 17.

⁸ Section 42A Report 5, section 3.8.2.1 para 24.

there ought to be a good reason for deviating so significantly from an approach which garnered support through a public submission process and later by parties through appeals to the Environment Court.

6.3 The PORPS19 included a number of issues in relation to each objective. Among them were six issue statements under Objective 4.2 which presented a compelling and relevant summary of issues pertinent to the EDBs. The issues are produced below for convenience:

- (a) Social and economic wellbeing depends on having adequate infrastructure. Failing to provide for its functional needs can result in adverse effects.
- (b) Aging and sub-standard infrastructure can present a risk to the community by threatening community resilience and can constrain new infrastructure solutions.
- (c) Activities locating in proximity to infrastructure may lead to reverse sensitivity effects on that infrastructure.
- (d) Infrastructure may adversely affect other lawfully established activities.
- (e) Infrastructure of regional and national significance may result in localised adverse environmental impacts, or adversely affect other nationally important values.
- (f) Some infrastructure can only locate in particular areas, and it may not always be possible to avoid significant adverse effects.

6.4 The EDBs submission is to reintroduce the above issues into a format that is consistent with how the PORPS frames them, namely, to expand on environmental, economic and social impact.

6.5 The EDBs are not the only submitter who requests the introduction of a new issue. Other submitters as noted by Ms Todd in her opening statement included: Transpower, the Telecommunication Companies, Fish and Game, RealNZ and NZSki.

6.6 The EDBs consider the following issue to be of regional significance: *Resilient electricity supply is critical to the health, wellbeing and prosperity of Otago, particularly in adapting to climate change.*

6.7 Electricity intersects with all aspects of our lives and plays an important role in adapting to climate change. It is so woven into the fabric of our

existence that it is easy to take for granted. The provision of electricity supply in Otago is complex and involves multiple sectors: generation, transmission and distribution. Its development must contend with, and appropriately protect the vast sensitive environments that Otago is privileged to hold. It is therefore necessary to ensure that there is a policy framework that supports both outcomes and ultimately achieves integrated management.

- 6.8 The issue is integrated with a focus on adapting to climate change. The evidence of Ms Dowd is that electricity distribution will have an important role in the provision of infrastructure to service decarbonisation initiatives and that Aurora Energy will undertake targeted investments to facilitate.⁹
- 6.9 Aurora Energy has also developed a Network Evolution Plan to understand the potential impacts of decarbonisation. Linked to that is more frequent and intense weather events which will require a proactive response to ensure the network can withstand those events, and a reactive response in terms of addressing faults or undertaking maintenance.¹⁰
- 6.10 The s 42A Report Author does not respond directly to the merits of the issue statement but offers the following general statement in opposition:¹¹

The existing issue statements have been workshopped and widely consulted on, including public consultation and Reference Group workshops. I do not consider that it is appropriate to add significant resource management issues to the existing suite when they have not been through the same consultation process as the eleven issues that have been identified.

In addition, I consider that most of the requested issue statements deal with industry specific concerns and do not warrant a dedicated issue statement in a Regional Policy Statement. The requested language is solution focused rather than issue focused.

⁹ Evidence of Joanne Dowd at 10.6

¹⁰ Evidence of Joanne Dowd at 10.8.

¹¹ Section 42A Report, Chapter 5: Submissions on Part 2 – Resource Management Overview, Jacqui Todd and James Adams at [550] page 101.

- 6.11 For the avoidance of doubt, Counsel notes that we are currently engaged in a public consultation process. The PORPS was publicly notified and submissions invited. The EDBs, being an entity that delivers a service of critical importance lodged a submission requesting an additional issue be identified. The public was put on notice to that submission and had an opportunity to support or oppose that relief. Counsel submits that the public has had every opportunity to consider the relief sought and that this current process is a continuation of the consultation and review process that the s 42A Report Author refers.
- 6.12 Ms Todd appears to have stepped back from her earlier statement somewhat in response to questioning from the panel on 7 February. In Additionally, Ms Todd appeared to accept the proposition, put to her by Commissioner Crosbie (Chair), that the volume of evidence demonstrating the issues with consenting major activities of importance to the region. This is an important concession as it goes to the heart of the EDBs concerns with the PORPS which is to ensure an appropriate consenting pathway is provided in lower order planning instruments.
- 6.13 An appropriate consenting pathway is not simply providing carte blanche rights to infrastructure, but rather, to find a way through the extensive use of the term 'avoid' in the PORPS in favour of an approach which recognises the relative importance of particular electricity lines and ensure that they only locate in those environments where it is necessary, and subject to that proviso, any effects are appropriately managed.
- 6.14 The relevance to the SRMR Chapter is:
- (a) Firstly to ensure that the PORPS is horizontally integrated i.e. that the effects management regime proposed in lower order policies is reflected through issues, objectives and methods.
 - (b) Secondly, to recognise a genuine issue of regional significance. Electricity supply is often taken for granted, despite its fundamental importance to all people. It is logical that no one raised it as an issue during consultation because a reasonable person expects electricity supply to be ubiquitous.

6.15 Counsel notes that this issue statement includes electricity generation and transmission and that joint evidence has not been led by those parties in support of this particular issue. It is necessary to refer to all three given the roles they play in delivering electricity. If it is necessary, then the EDBs would support a direction to confer with those submitters and submit an issue statement that is agreeable to the electricity generators and Transpower.

7. IM – Integrated Management

7.1 A regional policy statement must achieve integrated management of the natural and physical resources of the whole region. In that regard, the High Court recently said this, “includes achieving integration across policies so that, for example, policy or decisions on water issues should be made in conjunction with policy on land matters that affect water or links that might need to be made to the policy on natural hazards”.¹²

7.2 The EDBs support that general proposition. Their relief sought seeks integrated management by balancing the protection of the natural and physical resources of the region against the need to appropriately providing for a range of activities that “enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety”.¹³ That integration is sought to be achieved through a suite of policies, as advanced by Ms Justice that apply region wide.

7.3 The provisions IM-P1 and IM-P14 cut across the relief sought by the EDBs and introduce a standard which does not sit comfortably with the way that relief has been crafted. The issue with IM-P1 is primarily with the words that follow ‘expressed’ and which address the way in which a conflict between provisions is to be resolved.

7.4 The words which proceed it espouse the ordinary method of statutory interpretation and is generally analogous with the approach to decision making under the PORPS19. Counsel submits that introducing a ranking to resolve conflict assumes a shortcoming in the crafting of lower order provisions. Counsel submits that the more appropriate course of action is through the ordinary weighting of provisions in accordance with

¹² *Otago Regional Council v Royal Forest and Bird Protection Society of New Zealand Inc* [2022] NZHC 1777 at [30].

¹³ Resource Management Act 1991, s 5.

the directiveness of the language and the relevance of the provision to a particular issue. If there are particular issues of greater relevance or weight, then they ought to be given stronger or more directive language in accordance with their importance, rather than by introducing a failsafe through this policy.

8. Conclusion

8.1 For the reasons advanced in these submissions, Counsel submits that the relief sought by the EDBs is appropriate and assists to achieve the purpose of the PORPS.



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Counsel for Aurora Energy Limited, Network Waitaki Limited and PowerNet Limited

8 February 2023

Appendix 1 – Summary of Relief Sought Relevant to Hearing 8 February 2023

Definitions / Interpretation

Supplementary Evidence Version 11 October	Relief sought by EDBs
<p><u>Significant Electricity Distribution Infrastructure means electricity distribution infrastructure identified in a district plan which supplies:</u></p> <ul style="list-style-type: none"> • <u>Essential and emergency services (such as hospitals and lifeline facilities);</u> • <u>Other regionally significant infrastructure or individual consumers requiring supply of 1MW or more;</u> • <u>700 or more consumers; or</u> • <u>Communities that are isolated and which do not have an alternative supply in the event the line or cable is compromised and where the assets are difficult to replace in the event of failure.</u> 	<p><u>Significant Electricity Distribution Infrastructure means electricity distribution infrastructure identified in a district plan which supplies:</u></p> <ol style="list-style-type: none"> 1. <u>Essential and emergency services (such as hospitals and lifeline facilities);</u> 2. <u>Other regionally significant infrastructure or individual consumers requiring supply of 1MW or more;</u> 3. <u>700 or more consumers; or</u> 4. <u>Communities that are isolated and which do not have an alternative supply in the event the line or cable is compromised and where the assets are difficult to replace in the event of failure.</u>
<p>Regionally Significant Infrastructure</p> <p>means:</p> <p>(1) roads classified as being of regional importance in accordance with the One Network Road Classification <u>One Network Framework</u>,</p> <p>(2) electricity sub-transmission infrastructure, (3) renewable electricity generation facilities that connect with the local distribution network but not including renewable electricity generation facilities designed and operated principally for supplying a single premise or facility,</p> <p>(4) telecommunication and radiocommunication networks facilities as respectively defined in section 5 of the Telecommunications Act 2001 and in section 2 of the Radiocommunications Act 1989,</p>	<p>Regionally Significant Infrastructure</p> <p>means:</p> <p>(1) roads classified as being of regional importance in accordance with the One Network Road Classification <u>One Network Framework</u>,</p> <p>(2) electricity sub-transmission infrastructure <u>and significant electricity distribution infrastructure</u>,</p> <p>(3) renewable electricity generation facilities that connect with the local distribution network but not including renewable electricity generation facilities designed and operated principally for supplying a single premise or facility,</p>

Supplementary Evidence Version 11 October	Relief sought by EDBs
<p>(5) facilities for public transport, including terminals and stations,</p> <p>(6) the following airports: Dunedin, Queenstown, Wanaka <u>Wānaka</u>, Alexandra, Balclutha, Cromwell, Ōamaru <u>Ōamaru</u>, 140 Taieri.</p> <p>(7) navigation infrastructure associated with airports and commercial ports which are nationally or regionally significant,</p> <p>(8) defence facilities <u>for defence purposes in accordance with the Defence Act 1990</u>,</p> <p>(9) community drinking water abstraction, supply treatment and distribution infrastructure that provides no fewer than 25 households with drinking water for not less than 90 days each calendar year, and community water supply abstraction, treatment and distribution infrastructure (excluding delivery systems or infrastructure primarily deployed for the delivery of water for irrigation of land or rural agricultural drinking-water supplies)</p> <p>(10) community stormwater infrastructure,</p> <p>(11) wastewater and sewage collection, treatment and disposal infrastructure serving no fewer than 25 households, and</p> <p><u>(11A) oil terminals, bulk fuel storage and supply infrastructure, and ancillary pipelines at Port Chalmers and Dunedin, and</u></p> <p>(12) Otago Regional Council's hazard mitigation works including flood protection infrastructure and drainage schemes.</p> <p>(13) For the avoidance of doubt, any <u>Any</u> infrastructure identified as nationally significant infrastructure is also regionally significant infrastructure.</p>	<p>(4) telecommunication and radiocommunication <u>networks</u> facilities as respectively defined in section 5 of the Telecommunications Act 2001 and in section 2 of the Radiocommunications Act 1989,</p> <p>(5) facilities for public transport, including terminals and stations,</p> <p>(6) the following airports: Dunedin, Queenstown, Wanaka <u>Wānaka</u>, Alexandra, Balclutha, Cromwell, Ōamaru <u>Ōamaru</u>, 140 Taieri.</p> <p>(7) navigation infrastructure associated with airports and commercial ports which are nationally or regionally significant,</p> <p>(8) defence facilities <u>for defence purposes in accordance with the Defence Act 1990</u>,</p> <p>(9) community drinking water abstraction, supply treatment and distribution infrastructure that provides no fewer than 25 households with drinking water for not less than 90 days each calendar year, and community water supply abstraction, treatment and distribution infrastructure (excluding delivery systems or infrastructure primarily deployed for the delivery of water for irrigation of land or rural agricultural drinking-water supplies)</p> <p>(10) community stormwater infrastructure,</p> <p>(11) wastewater and sewage collection, treatment and disposal infrastructure serving no fewer than 25 households, and</p> <p><u>(11A) oil terminals, bulk fuel storage and supply infrastructure, and ancillary pipelines at Port Chalmers and Dunedin, and</u></p>

Supplementary Evidence Version 11 October	Relief sought by EDBs
	<p>(12) Otago Regional Council's hazard mitigation works including flood protection infrastructure and drainage schemes.</p> <p>(13) For the avoidance of doubt, any <u>Any infrastructure identified as nationally significant infrastructure is also regionally significant infrastructure.</u></p>

SRMR - Significant Resource Management Issues

Supplementary Evidence Version 11 October	Relief sought by EDBs
<p>SRMR-I1 Natural Hazards</p> <p>Economic</p> <p>...</p> <p>Natural hazards could also impact on renewable electricity generation in <u>and its transmission and distribution the region with subsequent impact on electricity generation capacity. the potential for significant national and regional consequences. Where possible new infrastructure should be located in areas where it is less vulnerable to natural hazards.</u></p>	<p>SRMR-I1 Natural Hazards</p> <p>Economic</p> <p>...</p> <p>Natural hazards could also impact on renewable electricity generation in <u>and the its transmission and distribution of electricity the region with subsequent impact on electricity generation capacity. the potential for significant national and regional consequences. Infrastructure should be enabled and protected to ensure it is resilient. Where possible practicable new infrastructure should be located in areas where it is less vulnerable to natural hazards.</u></p>

Supplementary Evidence Version 11 October	Relief sought by EDBs
	<p>Insert the following issues statement or amend the SRMI to include a new issue that addresses the need to operate, maintain, develop and upgrade regionally significant infrastructure.</p> <p>SRMI-X Resilient electricity supply is critical to the health, wellbeing and prosperity of Otago, particularly in adapting to climate change.</p> <p>Statement</p> <p>Electricity supply is essential to our way of life. It supports community wellbeing, health, safety and economic prosperity. It also has a critical role to play in adapting to climate change by supporting communities to become less reliant on fossil fuels for heating and transport. As such there will be a need for electricity network providers to undertake significant development and upgrades to support the communities needs in the future.</p> <p>Context</p> <p>Otago’s electricity supply comprises electricity generation (primarily from hydro-electricity generation); transmission through the National Grid; distribution from grid-exit points to zone substations, electricity sub-transmission infrastructure and finally through the distribution network to consumers.</p> <p>The electricity distribution network connects Otago to electricity supply. As such, faults in the network can have a direct impact on the health and safety and wellbeing of people and communities. The importance of electricity distribution to the community is reinforced by its identification as a lifeline utility. Electricity distribution providers have obligations to plan and prepare for significant natural hazard events to ensure that supply is able to be maintained and/or reinstated as soon as practicable.</p> <p>Climate change will have adverse effects on these network providers by increasing the risks to the infrastructure due to increasing storm intensity, increasing temperatures etc. This will occur in conjunction with increasing demands on the network dur to population growth and greater reliance on electricity. Providers will need to adapt to other changes including more small-scale community electricity generation (such as in home solar).and should be avoided by providing a framework for the operation, maintenance, upgrade and development of that infrastructure.</p>

Supplementary Evidence Version 11 October	Relief sought by EDBs
	<p data-bbox="719 188 943 220">Impact Snapshot</p> <p data-bbox="719 260 913 292">Environmental</p> <p data-bbox="719 339 2132 451">The distribution network has adverse effects on the environment which need to be appropriately managed. However, the management of the distribution network is limited by its functional and operational needs which often dictate where it can be located in the environment.</p> <p data-bbox="719 499 2132 611">The development, operation, maintenance and upgrade of the distribution network can be constrained or adversely affected by the establishment of incompatible activities around the network which can give rise to reverse sensitivity effects.</p> <p data-bbox="719 659 857 691">Economic</p> <p data-bbox="719 738 2132 850">The distribution network is critical to the economic wellbeing of people and communities. Faults in the distribution network arising from natural hazards; adverse effects from climate change and incompatible activities increase the risk of network faults.</p> <p data-bbox="719 898 2132 962">Failing to proactive manage incompatible activities in proximity to the distribution network may require those activities to be dis-established and cause unintended economic loss.</p> <p data-bbox="719 1010 2132 1090">A lack of integrated management and long-term strategic planning for land-use activities can delay urban growth and land use changes reliant on an electricity supply.</p> <p data-bbox="719 1137 813 1169">Social</p> <p data-bbox="719 1201 2132 1409">Incompatible activities can have adverse effects on the distribution network and may give rise to reverse sensitivity effects. This is particularly the case where urban expansion and intensification seeks to locate near the distribution network to a degree that can create risks to the health and safety and wellbeing of people. To avoid those risks, it is appropriate to manage incompatible activities near the distribution network, including primarily electricity sub-transmission infrastructure and significant electricity distribution infrastructure.</p>

Supplementary Evidence Version 11 October	Relief sought by EDBs
	<p>Where the electricity network is not resilient enough it can exacerbate the adverse effects and consequences of adverse weather events and natural hazards which can impact on communities already affected by these events.</p> <p>Or, as alternative relief:</p> <p>Amend the SRMR to include a new issue that addresses the need to operate, maintain, develop and upgrade regionally significant infrastructure.</p>

IM – Integrated Management

Supplementary Evidence Version 11 October	Relief sought by EDBs
<p><i>IM-P1 – Integrated approach to decision-making</i></p> <p><u><i>Giving effect to the integrated package of objectives and policies in this RPS requires decision-makers to consider all provisions relevant to an issue or decision and apply them according to the terms in which they are expressed, and if there is a conflict between provisions that cannot be resolved by the application of higher order documents, prioritise:</i></u></p> <p><u><i>(1) the life-supporting capacity and mauri of the natural environment and the health needs of people, and then</i></u></p> <p><u><i>(2) the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.</i></u></p> <p><i>The objectives and policies in this RPS form an integrated package, in which:</i></p> <p><i>(1) all activities are carried out within the environmental constraints of this RPS,</i></p> <p><i>(2) all provisions relevant to an issue or decision must be considered,</i></p>	<p>Note: Policy IM-P1 now incorporated parts of IM-P2, and IM-P1 has been deleted.</p> <p>Relief sought:</p> <p>Delete IM-P1 or refine this policy so that is only applies to the management of freshwater resources</p>

Supplementary Evidence Version 11 October	Relief sought by EDBs
<p>(3) if multiple provisions are relevant, they must be considered together and applied according to the terms in which they are expressed, and</p> <p>(4) notwithstanding the above, all provisions must be interpreted and applied to achieve the integrated management objectives IM-O1 to IM-O4.</p>	
<p>IM-P14 – Human impact</p> <p><u>When preparing regional plans and district plans, P</u>reserve opportunities for future generations by:</p> <p>(1) identifying environmental limits wherever practicable, to both growth and adverse effects of human activities beyond which the environment will be degraded,</p> <p>(2) requiring that activities are established in places, and carried out in ways, that are within those environmental limits and are compatible with the natural capabilities and capacities of the resources they rely on, and</p> <p>(3) regularly assessing and adjusting environmental limits and thresholds for activities over time in light of the actual and potential environmental impacts., <u>including those related to climate change, and</u></p> <p>(4) <u>promoting activities that reduce, mitigate, or avoid adverse effects on the environment.</u></p>	Delete IM-P14