BEFORE THE HEARING PANEL
CONSTITUTED BY THE OTAGO REGIONAL COUNCIL

IN THE MATTER	of the Resource Management Act 1991
AND	
IN THE MATTER	of submissions on the Proposed Otago Regional Policy Statement 2021, non-freshwater provisions
AND	
IN THE MATTER	of submissions and further submissions by Meridian Energy Limited

MEMORANDUM OF MERIDIAN ENERGY LIMITED RESPONDING TO THE NON-FRESHWATER HEARING PANEL'S MINUTE 19 CONCERNING IMPLICATIONS OF THE NPSIB

DATED 18 SEPTEMBER 2023

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MAY IT PLEASE THE PANEL:

[1] Following the Non-Freshwater Hearing Panel's Minute 19, Meridian Energy Limited (**MEL**) provides this short response.

[2] Attached to this memorandum, as Attachment 1, is a response from MEL's consultant planner, Ms Ruston, dated 18 September 2023, addressing Otago Regional Council's (**ORC**) memorandum on the implications of the National Policy Statement for Indigenous Biodiversity (**NPSIB**) for the Non-Freshwater provisions of the Proposed Otago Regional Policy Statement (**pORPS**) and the evidence of Andrew Maclennan (both dated 8 September 2023).

[3] MEL provided a memorandum (dated 18 August 2023) to the Freshwater Hearing Panel concerning the implications for the pORPS of the NPSIB. The key points from that memorandum equally apply to the non-freshwater provisions of the pORPS. In brief, the critical question for MEL is how the NPSIB assists with resolving the planning treatment of renewable electricity generation (**REG**) activities in the pORPS. As detailed in MEL's submissions, ORC's smorgasbord approach to managing nationally significant REG activities (with provisions located in various parts of the policy statement) is resulting in inconsistencies with the National Policy Statement for Renewable Electricity Generation 2011 (**NPSREG**) and other national policy direction. In contrast, the energy generators have recommended a well-ordered policy and rule framework that provides a distinct focus on REG activities and is consistent with and gives effect to the national policy direction. The NPSIB specifically excludes its application to REG activities, thereby reinforcing the need for discrete provisions for REG activities.

[4] MEL provided a memorandum to the Non-freshwater Hearing Panel and the Freshwater Hearing Panel (dated 4 September 2023) setting out the four key principles that counsel argued for in the *Port Otago* proceeding for Marlborough District Council and that are now found in the *Port Otago* decision. For the reasons set out in that memorandum, MEL submits that the energy generator provisions, updated by Ms Ruston's recommendations

in Attachment 1 to this memorandum, are the correct provisions for the Panel to apply.

J W Maassen
Counsel for Meridian Energy Limited

ATTACHMENT 1:

RESPONSE OF SUSAN RUSTON TO ORC'S MEMORANDUM ON THE IMPLICATIONS OF THE NPSIB AND EVIDENCE OF MR ANDREW MACLENNAN DATED 8 SEPTEMBER 2023

Name, Qualifications, and Experience

[1] My full name is Susan Clare Ruston.

[2] My qualifications and experience are set out in my statement of evidence dated 23 November 2022.

Code of Conduct

[1] I have read the Code of Conduct for Expert Witnesses issued as Section 9 of the Environment Court of New Zealand's Practice Note 2023. I agree to comply with the Code of Conduct. I am satisfied that the matters addressed in this response are within my expertise. I am unaware of any material facts that have either been omitted or might alter or detract from the opinions expressed in this response.

Scope of Response

[2] I have been asked by Meridian Energy Limited (**Meridian**) to consider the implications of the National Policy Statement for Indigenous Biodiversity (**NPSIB**) for the non-freshwater provisions of the Proposed Otago Regional Policy Statement (**pORPS**) that address potential renewable electricity generation (**REG**) activities and to respond to Otago Regional Council's Memorandum on the Implications of the NPSIB dated 8 September 2023 (**the ORC Memo**) and the evidence of Mr Andrew Maclennan dated 8 September 2023.

NPSIB Does Not Apply to REG Activities

[3] As identified in the ORC Memo[1] and Mr Maclennan's evidence[2], clause 1.3(3) of the NPSIB explicitly states that nothing in the NPSIB applies to the development, operation, maintenance and upgrade of renewable electricity generation assets and activities. That, in my opinion, is an unambiguous policy directive from the Government that recognises and reinforces the national significance of REG activities in avoiding, reducing or displacing energy sources that emit greenhouse gases, as is set out in the National Policy Statement for Renewable Electricity Generation 2011 (**NPSREG**). This policy directive responds to growing evidence that the effects of climate change are profoundly impacting the environment (including biodiversity) and communities, locally, nationally, and globally and that increased renewable electricity generation is a key part of the Government's response to climate change.

[4] This distinction in how the development, operation, maintenance and upgrade of renewable electricity generation assets and activities are to be managed under the Resource Management Act 1991 (**the Act**) must be appropriately addressed in the pORPS.

[5] As set out in my evidence dated 23 November 2022, Meridian's submissions sought to ensure that the pORPS provisions relating to REG activities fully give effect to the NPSREG (as required by s62(3) of the Act), are readily locatable in the pORPS, and their relationship to other provisions in the plan is clear.

[6] In my opinion, the NPSIB's specific exclusion of its application to REG activities further highlights the need for a self-contained set of REG provisions in the pORPS as set out in my evidence dated 23 November 2022. Such separation of REG provisions will avoid tensions arising when giving effect to the NPSIB in other parts of the pORPS.

[1] ORC Memo, paragraph 13
[2] Evidence of Andrew Maclennan, Implications of the NPSIB, 8 September 2023, paragraph 24

Effects Management Hierarchy

[7] Mr Maclennan has recommended adoption of new policy ECO-P6A which sets out an effects management hierarchy for REG and electricity transmission activities.

[8] In establishing the need for the new policy Mr Maclennan states that:

> "*Some renewable electricity generation and electricity transmission network activities will be nationally or regionally significant and others will not.*"[3]

[9] I disagree with Mr Maclennnan's statement. There are now three national policy statements that recognise and provide for the national significance of REG. The NPSREG directs that the national significance of REG activities is recognised and that the development, operation, maintenance and upgrading of REG activities are provided for so that the Government's national target for REG is met. Policy 4 of the National Policy Statement for Freshwater Management February 2023 (**NPSFM**) requires that freshwater is managed as part of New Zealand's integrated response to climate change. Clause 3.31 of the NPSFM allows for target attribute states to be set below national bottom lines in Freshwater Management Units that are affected by the Clutha Hydro-electricity Generation Scheme (amongst other schemes); and, as previously discussed, clause 1.3(3) of the NPSIB explicitly states that nothing in the NPSIB applies to the development, operation, maintenance and upgrade of renewable electricity generation assets and activities.

[10] Further to this, the NPSREG establishes the national significance of all REG activities regardless of their scale. Policy B of the NPSREG requires decision-makers to have particular regard to (amongst other matters):

> *"b) even minor reductions in the generation output of existing renewable electricity generation activities can cumulatively have significant adverse*

[3] Evidence of Andrew Maclennan, Implications of the NPSIB, 8 September 2023, paragraph 136

effects on national, regional and local renewable electricity generation output; and

c) meeting or exceeding the New Zealand Government's national target for the generation of electricity from renewable resources will require the significant development of renewable electricity generation activities".

[11] Human induced climate change poses a profound risk to achieving sustainable management of natural and physical resources across New Zealand, including in the Otago Region. New Zealand's response to climate change is not limited to the responsibility of some regional councils and not others. On this basis, I am not able to identify an REG activity in Otago (or that could be established in Otago) that would not be both nationally and regionally significant.

[12] In establishing the need for the new policy Mr Maclennan also states that:

> *"In my view, although the NPSIB does not apply to renewable electricity generation or electricity transmission networks, this does not mean their effects should not be managed at all. I am aware that this point has been made in the legal submissions of Forest and Bird on the FPI parts of the pORPS. There are still obligations on local authorities to protect areas of significant indigenous vegetation and significant habitats of indigenous fauna and to maintain indigenous biodiversity."*[4]

[13] I agree with this statement, however I consider it is important to acknowledge that when managing the effects of REG activities, the national direction that must be given effect to leads to a distinctly different 'effects management hierarchy' for REG activities.

[14] On this basis, I disagree with Mr Maclennan's recommended new policy ECO-P6A where (1) and (2) of the policy together imply that some REG activities will not be nationally or regionally significant. A policy that

[4] Evidence of Andrew Maclennan, Implications of the NPSIB, 8 September 2023, paragraph 137

implies some REG activities are not nationally significant is not consistent with the NPSREG, NPSFM and NPSIB.

[15] Concerning Mr Maclennan's new policy ECO-P6A (1)(a) to (d), I consider refinement is needed to be consistent with and give effect to the NPSREG.

[16] For example, to be consistent with the NPSREG, Mr Maclennan's new policy ECO-P6A (1)(a) should be amended as follows:

> *"(a) avoiding as far as practicable~~, as a first priority,~~ locating within significant natural areas, and"*

[17] I consider that this change better reflects that the NPSREG does not set a 'first priority' in the hierarchy, while also recognising that it is reasonable (under the Act) to expect that avoidance of adverse effects is achieved as far as practicable.

[18] I consider that Mr Maclennan's new policy ECO-P6A (1)(b), where it requires that adverse effects are 'minimised', is not consistent with the NPSREG. While the 'Proposed National Policy Statement for Renewable Electricity Generation [2023] Draft for consultation V 7.4 as at 30/3/2023' uses the term "*minimised*", Mr Maclennan rightly notes that this document is a draft and currently has no legal weight.[5] The NPSREG does not use the term 'minimised', rather it refers to avoiding, remedying, or mitigating environmental effects (along with offsetting and compensation). Further to this, while the NPSIB uses 'minimised' in its effects management hierarchy, the NPSIB does not apply to REG activities. On this basis, the term 'minimised' should not be adopted in an effects management hierarchy for REG activities.

[19] Mr Maclennan has recommended new definitions for 'biodiversity compensation' and 'biodiversity offsetting'. Both definitions refer to 'avoidance, minimisation and remediation measures' and do not refer to 'mitigation measures' as provided for in the NPSREG when managing the effects of REG activities. The same issue applies to Mr Maclennan's

[5] Evidence of Andrew Maclennan, Implications of the NPSIB, 8 September 2023, paragraph 132

recommended APP3 and APP4 that set the principles for biodiversity offsetting and biodiversity compensation. To be consistent with the NPSREG and NPSIB (where it states that it does not apply to REG activities) these definitions and appendices need to be amended to reflect that mitigation is part of the effects management for REG activities.

[20] For the preceding reasons, I do not support Mr Maclennan's new policy ECO-P6A and I continue to support provision of the self-contained REG provisions set out in Annexure 1 to my evidence of 23 November 2023, in particular the effects management hierarchy in EIT-EN-P5 of that Annexure.

[21] In response to Mr Maclennan's other recommended amendments to the pORPS, consequential amendments will be needed when providing a set of self-contained REG provisions. For example, REG activities would need to be identified as being exempt from Mr Maclennan's recommended definition of "Effects management hierarchy (in relation to indigenous biodiversity)". This could be achieved by amending EIT-EN-P5 in my evidence of 23 November 2023 as follows:

> *"Despite other provisions in this policy statement, when providing for new or upgraded renewable electricity generation activities…."*

Correction to My Evidence of 23 November 2022

[22] In revisiting my evidence of 23 November 2022 through this response to the NPSIB I have identified an error in my Annexure 1. Concerning my recommended EIT-EN-P5 (2)(b), my correction is as follows:

> *"In a scheduled significant natural area, where more than minor residual adverse effects on biodiversity cannot be practicably avoided, remedied, or mitigated, regard shall be had to biodiversity offsetting and/or biodiversity compensation, and the principles set out ~~must be considered in accordance with~~ in APP3 and/or APP4."*

Conclusion

[23] The NPSIB explicitly states that nothing in the NPSIB applies to the development, operation, maintenance and upgrade of renewable electricity generation assets and activities.

[24] Concerning REG activities, I have considered whether Mr Maclennan's recommended changes to the pORPS's non-freshwater provisions, to give effect to the NPSIB, are also consistent with and give effect to the NPSREG.

[25] In my opinion, Mr Maclennan's recommended new ECO-P6A is not consistent with the NPSREG, and this highlights the importance of the pORPS setting clear direction on how REG activities are to be provided for and managed within the pORPS, particularly when tensions arise between provisions in the pORPS.

[26] On this basis, I confirm that I continue to recommend the amendments to the pORPS set out in Annexures 1 and 2 in my evidence of 23 November 2022, and at the same time I recommend the following amendment to EIT-EN-P5 in my evidence of 23 November 2023:

> *"Despite other provisions in this policy statement, when providing for new or upgraded renewable electricity generation activities…."*.

[27] For completeness, the package of REG provisions set out in Annexure 1 of my evidence of 23 November 2022, and the amendments to these provisions discussed in my evidence today, is provided in the following table.

Recommended New Provisions / Text	Scope
Proposed new note at beginning of chapter: Note: The provisions contained in EIT-EN apply to all energy activities and electricity generation activities, and the provisions contained in EIT-INF do not apply to those activities.	Manawa (00311.29) submission. Contact further submission point (FS00318.116) Meridian further submission point (FS00306.073) [and consequential amendments]
Objectives	
EIT–EN–O1 Energy and well-being Renewable electricity generation activities enable people and communities to provide for their environmental, social and cultural well-being, their health and safety, and support sustainable economic growth and development.	Meridian submission (00306.051) Contact submission (00318.023) Manawa submission (00311.030), further submission from Contact (FS00318.121) [and consequential amendments]
EIT-EN-O2 – Existing renewable electricity generation is protected Existing renewable electricity generation capacity is protected, and where appropriate enhanced.	Contact submission (00318.024) Manawa submission (00311.031) Meridian further submission (FS00306.076)

EIT–EN–O3 Renewable electricity generation contributes to national targets Renewable electricity generation activities in Otago contribute to the achievement of New Zealand's national target for renewable electricity generation and climate change commitments, including supporting the reduction of national greenhouse gas emissions.	Manawa submission (00311.031) and Meridian further submission (FS00306.076) Contact submission (00318.024) Meridian submission (00306.052) [and consequential amendments]
EIT–EN–O4 Energy use Development is located and designed to facilitate the efficient use of energy and to reduce demand if possible, minimising the contribution that Otago makes to total greenhouse gas emissions.	As per pORPS version subsequent to supplementary evidence.
Policies	
EIT–EN–P1 Recognising and providing for renewable electricity generation Ensure that decisions on the allocation and use of natural and physical resources, including the use of fresh water and development of land: (1) recognise and provide for: a) the national significance of renewable electricity generation activities; and b) the national, regional and local benefits of renewable electricity generation activities, (2) have particular regard to:	Manawa submission (00311.034) Meridian submission (00306.054) Contact submission (00318.026) Manawa submission on policy order (00311.032) [and consequential amendments]

a) the importance of maintaining the generation output of existing renewable electricity generation activities and the continued availability of the renewable energy resource for existing activities, and b) the functional needs and operational needs of existing and new renewable electricity generation activities, (3) recognise that the attainment of increases in renewable electricity generation capacity will require significant development of renewable electricity generation activities.	
EIT–EN–P2 Operation, maintenance, refurbishment and minor upgrading of existing facilities Protect and enable the operation, maintenance, refurbishment and minor upgrading of existing renewable electricity generation activities. **Insert new definition of 'minor upgrading':** Development to bring existing structures or facilities up to current standards or to improve the functional characteristics of structures or facilities, provided the upgrading itself does not give rise to any significant adverse effects on the environment and provided that the effects of the activity are the same or similar in character, intensity and scale as the existing structure and activity. In relation to renewable electricity generation activities, includes increasing the generation or transmission capacity, efficiency or security of regionally significant infrastructure and replacing support structures within the footprint of authorised activities.	Manawa submission (00311.033) Meridian submission (00306.053) Contact submission (00318.025) Manawa submission on policy order (00311.032) [and consequential amendments]

EIT–EN–P3 Identifying new sites or resources Provide for activities associated with the investigation, identification and assessment of potential sites for new renewable electricity generation and of new and diverse sustainable energy sources.	Manawa submission (00311.036) Meridian submission (00306.056) Contact submission (00318.028) [and consequential amendments]
EIT–EN–P4 Development and upgrade of renewable electricity generation Provide for upgrades to existing renewable electricity generation activities and the development of new renewable electricity generation activities.	Manawa submission (00311.035) Meridian submission (00306.055) Contact submission (00318.027) [and consequential amendments]
EIT–EN–P5 Managing effects Despite other provisions in this policy statement, when ~~When~~ providing for new or upgraded renewable electricity generation activities: (1) Avoid, where practicable, locating such activities in the following areas: a) Scheduled wāhi tupuna, and areas with protected customary rights, b) Scheduled significant natural areas, c) Natural wetlands, d) Scheduled outstanding natural features and outstanding natural landscapes, e) Scheduled outstanding water bodies, f) Scheduled areas of outstanding natural character, g) Scheduled areas or places of historic heritage value,	Manawa submission (00311.037) Meridian submission (00306.057) Contact submission (00318.029) [and consequential amendments]

(2)	Where it is not practicable to avoid locating in the areas listed in (1) above, because of the functional needs or operational needs of renewable electricity generation activities, manage adverse effects as follows: (a) In wāhi tupuna, in accordance with HCV-WT-P2, (b) In a scheduled significant natural area, where more than minor residual adverse effects on biodiversity cannot be practicably avoided, remedied, or mitigated, regard shall be had to biodiversity offsetting and/or biodiversity compensation, and the principles set out ~~must be considered in accordance with~~ in APP3 and/or APP4, (c) In natural wetlands, in accordance with the NESF, (d) In all other areas listed in (1) above, manage the adverse effects of the renewable electricity generation activities on the values that contribute to the area's importance by: i. Avoiding adverse effects, where practicable, ii. Where adverse effects cannot be practicably avoided, they are remedied or mitigated to the extent practicable, iii. Where they cannot be practicably remedied or mitigated regard shall be had to offsetting and/or compensation of more than minor residual adverse effects.	
(3)	In areas outside (1), avoid, remedy or mitigate significant adverse effects and when considering any residual adverse effects have regard to offsetting measures and compensation.	

EIT-EN-P5A Managing the effects of renewable electricity generation activities within the coastal environment When managing the effects of renewable electricity generation activities within the coastal environment the provisions of the CE – Coastal environment chapter apply.	Consequential amendment to reflect other submissions and s42A / supplementary evidence.
EIT–EN–P6 Reverse sensitivity Activities that will result in reverse sensitivity effects on existing or consented renewable electricity generation activities are avoided, and only if that is not practicable, are minimised. **Insert new definition for 'minimise'** as "*means to reduce to the smallest amount practicable.*"	Manawa submission (00311.038) Meridian submission (00306.058) Contact submission (00318.030) [and consequential amendments]
EIT–EN–P7 Small and community scale distributed electricity generation Provide for small and community scale distributed electricity generation activities that increase the local community's resilience and security of electricity supply.	As per PORPS version subsequent to supplementary evidence.
EIT–EN–P8 Non-renewable electricity generation Avoid the development of non-renewable electricity generation activities in Otago and facilitate the replacement of non-renewable energy sources, including the use of fossil fuels, in electricity generation.	As per PORPS version subsequent to supplementary evidence.
EIT–EN–P9 Energy conservation and efficiency Development supports energy conservation and efficiency by:	As per PORPS version subsequent to supplementary evidence.

(1) requiring the development of new housing that is durably constructed and energy efficient, (2) designing subdivisions to maximise solar access, and (3) locating development to minimise, as far as practicable, transportation costs, car dependency and greenhouse gas emissions.	
Methods	
EIT-EN-M1 – Regional plans Otago Regional Council must prepare or amend and maintain its regional plans to: (1) protect and enable the ongoing operation, maintenance and minor upgrading (including identifying activities that qualify as minor upgrades) of existing renewable electricity generation activities including maintenance of generation output and protection of operational capacity, (2) provide for activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation, (3) provide opportunities to increase the installed capacity of renewable electricity generation assets and enable development of new renewable electricity generation activities, (4) manage the potential effects of new or upgraded renewable electricity generation activities, (5) avoid the establishment or operation of activities that may result in reverse sensitivity effects or compromise the operation or maintenance of renewable electricity generation activities or adversely affect the efficient functioning of renewable electricity generation infrastructure.	Meridian submission (00306.061) Manawa submission (00311.040) [and consequential amendments]

EIT-EN-M2 – District plans Territorial authorities must prepare or amend and maintain their district plans to: (1) protect and enable the ongoing operation, maintenance and minor upgrading (including identifying activities that qualify as minor upgrades) of existing renewable electricity generation activities including maintenance of generation output and protection of operational capacity, (2) provide for activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation, (3) provide opportunities to increase the installed capacity of renewable electricity generation assets and enable development of new renewable electricity generation activities, (4) manage the potential effects of new or upgraded renewable electricity generation activities, (5) avoid the establishment or operation of activities that may result in reverse sensitivity effects or compromise the operation or maintenance of renewable electricity generation activities or adversely affect the efficient functioning of renewable electricity generation infrastructure, (6) require the design of subdivision development to optimise solar gain, including through roading, lot size, dimensions, layout and orientation, and (7) require the design of transport infrastructure to provide for multi-modal transport options in urban and rural lifestyle areas.	Meridian submission (00306.062) Manawa submission (00311.041) [and consequential amendments]

EIT-EN-M3 – Education and information (1) Local authorities must provide education and information to improve energy efficiency and provide for the adoption of renewable energy sources, including: (a) ways to increase energy efficiency and energy conservation, and (b) opportunities for small and community scale distributed electricity generation. (2) Territorial authorities must provide information on design techniques to optimise solar gain, including through roading, lot size, dimensions, layout, and orientation.	As per PORPS version subsequent to supplementary evidence.
Explanation	
EIT-EN-E1 – Explanation The policies in this section are designed to set a clear preference for renewable electricity generation activities contributing to meeting New Zealand's national target for renewable electricity generation and the decarbonisation of the economy. Renewable electricity generation is a matter of national importance and a key component in responding to climate change and energy demands. Increasing renewable electricity security will assist with ensuring that communities have options for clean heat and electricity for health and wellbeing services. Renewable electricity generation activities are enabled by providing for the investigation, operation, maintenance, upgrading and development of existing and new assets and ensuring that decisions on allocating	Meridian submission (00306.063) Manawa submission (00311.042) [and consequential amendments]

natural resources and the use of land, for example, recognise the benefits of renewable electricity generation activities arising from maintaining or increasing generation capacity. The functional needs and operational needs associated with renewable electricity generation activities are to be recognised, and the extent to which unavoidable adverse effects can be remedied or mitigated is a key consideration. Where residual adverse effects remain, consideration is to be given to proposals to offset these or compensate for them. To ensure the on-going functionality of renewable electricity generation assets and to maximise their benefits, reverse sensitivity effects or activities that may compromise renewable electricity generation activities are to be avoided or only if that is not reasonably practicable their impacts minimised. The policies also seek that energy use is efficient and energy waste is reduced, which will have consequential effects on minimising Otago's contribution to the nation's greenhouse gas emissions.	
Principal reasons	
EIT-EN-PR1 – Principal reasons Electricity is a basic requirement of life in Otago. It enables communities to provide for their well-being, and health and safety, and is essential to the regional economy. Everyday life is significantly affected when electricity supply is disrupted. Therefore, ensuring the security of renewable electricity resources to meet demand is crucial. The ability of existing renewable electricity generation activities to continue operating is dependent on access to resources such as water in hydro lakes and the operator's ability to maintain existing infrastructure.	Manawa submission (00311.044) [and consequential amendments]

Otago is fortunate to have several existing renewable electricity generation sites and the potential to increase renewable electricity generation. The benefits of renewable electricity generation include reducing greenhouse gas emissions, reducing dependence on imported energy and increasing supply security. These benefits are afforded to both Otago communities and nationally as exported electricity is significant for other regions. Because of this, protecting existing resources and providing for new renewable electricity generation opportunities to meet increasing electricity demand is necessary. Additionally, addressing inefficiencies in energy use can ensure that existing infrastructure is better utilised to reduce the need for new generation sites. Renewable electricity generation facilities may cause adverse effects on the environment because of their functional need or operational need to locate in particular areas. These areas are where resources are available, for example water for hydro-electricity generation, but they may also contain other significant values. In some situations, it may not be possible to avoid, remedy or mitigate all significant adverse effects and consideration should be given to whether those residual effects are offset or compensated. The provisions in this chapter assist in giving effect to the NPSREG and NPSFM and implementing sections 5 and 7(j) of the RMA. Implementation of the provisions will occur primarily through regional plans and district plan provisions but regional, city and district councils also have a role in providing education and information to the community.	
Anticipated environmental results	
EIT-EN-AER1	As per PORPS version subsequent to supplementary evidence.

The proportion of electricity generated by renewable electricity generation activities (including small and community scale distributed electricity generation) in Otago increases over time.	
EIT-EN-AER2 Energy use in Otago becomes more efficient over time and security of supply is maintained.	As per PORPS version subsequent to supplementary evidence.
EIT-EN-AER3 The adverse effects associated with renewable electricity generation activities are avoided, remedied or mitigated, or where appropriate, offset or compensated for.	Manawa submission (00311.045), further submission from Meridian (FS00306.094) [and consequential amendments]
EIT-EN-AER4 The proportion of greenhouse gas emissions per capita from electricity generation reduces over time.	As per PORPS version subsequent to supplementary evidence.

Susan Clare Ruston