

Further Submission

Please send your submission to reach us by **4.00 pm on Thursday, 19 May 2011**

Further Submission Number
Office use only

TO: The Chief Executive
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Name: New Zealand Geothermal Association

*[Full name of the person or organisation
making the submission]:*

Further Submission on: Proposed Bay of Plenty Regional Policy Statement

1. I do wish to be heard in support of my further submission.

[Delete as required]

2. If others make a similar submission I **would** be prepared to consider presenting a joint case with them at any hearing.

[Delete as required]

Brian White, Executive Officer, New Zealand Geothermal Association

19 May 2011

*[Signature of person making submission or person authorised
to sign on behalf of person or organisation making submission.]*

Date

[A signature is not required if you make your submission by electronic means]

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FURTHER SUBMISSION POINTS:

Submission Number <i>[Submission number of original submission as shown in the "Summary of Decisions Requested" report]</i>	Submitter Name <i>[Please state the name and address of the person or organisation making the original submission as shown in the "Summary of Decisions Requested" report]</i>	Section Reference <i>[Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposed plan change]</i>	Support/Oppose	Reasons <i>[State in Summary the nature of your submission giving clear reasons]</i>
37-24 46-23 66-23 95-23	Ngati Ranganui Iwi Society Ngati Makino Heritage Trust Waitaha Resource Management Committee Te Rununga o Ngati Kahu (ki Tauranga Moana)	Section 2.3 Energy and Infrastructure related to adding a Policy to enable development of geothermal infrastructure	Oppose	While NZGA supports the intention of the listed submitters in wanting to enable the development of geothermal infrastructure, we are satisfied that geothermal is recognised as a key renewable energy form in the Bay of Plenty Region and that Policy EI 1B is about promoting renewable energy sources. This policy achieves the same end using the recommended method 3 of resource consents, etc
42-10	TrustPower Limited	Section 2.3 related to adding an objective relating to providing for on-going generation of energy from renewable energy sources	Support	NZGA is supportive of efforts to maximise the use of renewable energy forms, but sees the ability to retain existing uses as being a key to achieving targets. We think that TrustPower's words related to electricity generation are too specific, though has weight associated with the NPS on Renewable Electricity Generation. One example of a major existing non-electricity use in the region is the geothermal heat supply to Norske Skog Tasman. On that basis we would favour modification of the new objective to "Provide for the on-going generation of energy from existing energy schemes using renewable energy sources"
84-16	East Coast Bay of Plenty Conservation Board	Section 2.3 related to introduction of objectives and policies to manage adverse environmental effects	Oppose	NZGA supports the notion of managing (avoid, remedy, and/or mitigate) environmental effects, but this is a given under the Resource Management Act. Policies that merely repeat or restate requirements under the Act are pointless and are potentially confusing. It does not reflect an appropriate balance between dealing with adverse effects and providing for the appropriate use of geothermal and hydroelectric energy resources.

Submission Number	Submitter Name	Section Reference	Support/Oppose	Reasons
13-6	Shell NZ Ltd, BP Oil NZ Ltd, Mobil Oil NZ Ltd, Chevron NZ	Section 2.3.1	Support	NZGA is pleased with the general content of section 2.3.1 covering Energy
8-7 14-5	Transpower New Zealand Ltd Powerco Ltd	Section 2.3.1 para 5 insertion of the words "and facilitate"	Support	NZGA supports the priority of more reliable security of electricity supply, etc. Development will be undertaken by the likes of Transpower and Powerco, but the Regional Council can play its part by <u>facilitating</u> the various projects put forward.
42-8	TrustPower Ltd	Section 2.3.1 para 2 regarding existing renewable energy generation, and Para 6 regarding the need to balance conflicting interests	Support	The para 2 statement gives detail to their earlier comment (42-10), and correctly refers to "renewable energy generation" rather than "renewable electricity generation". The statement to follow paragraph 6 about balancing conflicting interests between development and protection desires is self-evident.
82-6 92-51	Mighty River Power Contact Energy Ltd	Section 2.3.1 para 3 addition of reference to hydro And addition of reference to future wind	Support	It is useful to recognise the full suite of renewable energy options in the region.

Submission Number	Submitter Name	Section Reference	Support/Oppose	Reasons
110-6	Energy Efficiency and Conservation Authority	Section 2.3.1 para 3 addition of words explaining the context of the geothermal resource in the region	Support	We fully agree that “the region is an important producer of electricity and one of the two main regions with significant geothermal resources” and this has motivated our interest in the development of this whole policy. We note that the following sentence includes reference to hydro and a slightly changed emphasis on bioenergy which we are also satisfied with.
98-2	Carter Holt Harvey Ltd	2.3.2 para 2 addition of a general statement to the effect that some other regionally significant industrial infrastructure needs the same consideration as electricity	Support	CHH brings out the critical role of geothermal infrastructure in supplying steam to the Kawerau area, and in turn, the critical economic importance of the industry at Kawerau to the region.
110-8	EECA	2.3.2 para 2 addition of reference to the national significance of infrastructure	Support	This brings out a point we raised earlier in which we consider the geothermal and other infrastructure resources are of national importance also.
42-9	TrustPower Ltd	2.3.3 new issue related to the need to provide for existing renewable energy projects	Support but in relation to renewable energy as opposed to renewable electricity only	Our move toward the renewable energy targets will require attention to both the sustaining of existing projects and development of new projects. NZGA thinks more broadly than just electricity generation.

Submission Number	Submitter Name	Section Reference	Support/Oppose	Reasons
98-3	Carter Holt Harvey	2.3.3 Issue 4	Oppose	While we agree with CHH that energy conservation and efficiency are practices at the Kawerau industrial site where renewable energy is a major feature, there should always be encouragement of these aspects. The RPS is in error in not recognising these features at Kawerau (and some acknowledgement could be considered), but incentives to use renewable energy sources and to encourage energy conservation and energy efficiency should not be deleted from the report.
151-1	Environment Waikato	2.4 alignment with Environment Waikato RPS	Support	NZGA broadly supports an alignment of Bay of Plenty and Waikato geothermal regional policy statements in line with the signed agreement between the parties. We note that this does not require an exact cloning, but there are significant difference including in underlying philosophy, that should be avoided.
92-2 92-3 151-3	Contact Energy Ltd Contact Energy Ltd Environment Waikato	2.4 portfolio approach to geothermal resources	Support	A key area for philosophical alignment will be the portfolio approach taken by Environment Waikato to the management of geothermal resources. In this approach, both a national and regional resource is recognised along with systems within this. There will be thermal regimes within every rock and at every location in the region – a single geothermal resource. Within that there will be combinations of convection and conduction representing conventional hydrothermal systems and possible EGS systems respectively (in fact the distinction is not that clear cut). Sustainable development of the resource is achieved through the protection of certain systems within the region. It is not possible to protect all features in all systems.
151-6	Environment Waikato	2.4 regarding alignment of geothermal system types with those of EW	Support	We support broad alignment of Waikato and BOP policy. Paralleling system types is a useful mechanism, with the addition of a separate category for Rotorua as has been done in EW's submission.

Submission Number	Submitter Name	Section Reference	Support/Oppose	Reasons
92-11 129-8	Contact Energy Ltd The Proprietors of Taheke 8C Adjoining Blocks (Inc)	2.4 regarding classification of Taheke field	Support	The Taheke system does not sit under an unmodified landscape (historic sulphur mining) so does not readily sit in a classification belonging to largely unmodified systems. NZGA would support a reclassification as a 'development system' following adequate consultation with relevant Maori land holding entities, considering economic impacts and recognising current aspirations.
149-6	Bay of Plenty Regional Council	2.4 regarding adding a Research system classification	Support (especially in the context of aligning with EW)	There are geothermal systems and opportunities such as the undersea resources within the Bay of Plenty that require further research. Further there may be questions around possible links to protected systems which require a temporary cautionary classification. This can be achieved through alignment with EW's classifications.
92-12	Contact Energy Ltd	2.4 regarding ability to change classifications through a Plan Change	Support	There are classifications that are intended to be of a temporary nature e.g. EW's Research Geothermal Systems/BOP's Geothermal Management Group 6. Equally some systems could be shifted from Limited Development to Development systems. A mechanism for progressing explored fields to a development category should be outlined.
151-8	Environment Waikato	2.4 regarding naming conventions and allocation of geothermal systems to classifications	Support largely	NZGA supports the naming conventions and largely supports the classification of resources. Greater attention should have been paid to BOPRC's own desire to classify Rotoiti and the Puhi Puhi sector of Rotoma along with Kawerau and we would support this. As discussed above, we also favour classification of Taheke with Kawerau as a Development System

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151-11 92-5	Environment Waikato Contact Energy Ltd	2.4 regarding better maps of geothermal systems	Support in part	Both submitters have suggested better maps starting with regional maps. We agree that both regional maps should be improved to better reflect current understanding of the fields. Current maps are so inaccurate that it is unclear whether Taheke is located north of Lake Rotorua or Lake Rotoiti. Later in our submission we support the production of maps for the individual Development and Limited Development Systems.
82-10 92-13 110-13 151-4	Mighty River Power Ltd Contact Energy Ltd Energy Efficiency and Conservation Authority Environment Waikato	2.4.1 regarding regionally significant geothermal issues	Support	Overall we are happy with this section though agree that geothermal energy will sit alongside other renewable energy sources. We support EW's view that resources have their own intrinsic value outside any financial worth. We also agree that there is room to separate out issue 2 to cover allocation, lack of information and the need for integrated management
82-11, 12 92-14, 15	Mighty River Power Ltd Contact Energy Ltd	2.4.2 Objectives 7 and 8 regarding protection of geothermal features and holistic management of geothermal systems	Support	Several submissions indicated problems with Objective 7 and 8. Both MRP and Contact revisions need some recasting in terms of objectives, but the essential elements are ensuring a portfolio approach across the regional resource, protecting some systems from development, giving some protection to significant geothermal features in appropriate system classifications, and appropriately allocating resources.
129-1	The Proprietors of Taheke 8C & Adjoining Blocks (Inc)	2.6 regarding the role of land holding trusts and incorporations in exercising mana whenua	Support	Trusts and Incorporations represent diverse interests, while having commercial aspirations. Their views with respect to developments will be both useful and appropriate.

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151-15	Environment Waikato	2.7 Matters of National Importance changing the text to refer to surface features rather than geothermal resources	Support	The context of the discussion is in relation to outstanding landscapes. In terms of the geothermal features mentioned, these are surface features so 'geothermal surface features' should be referred to rather than 'geothermal resources'.
92-58	Contact Energy Ltd	Part 3\3.1\Policy AQ 2A regarding taking account of the natural discharges of H2S in a geothermal environment	Support	H2S and its characteristic smell are a natural feature of geothermal environments. We agree with the statement and the provisos around offensive nuisance effects and risk to human health that Contact has suggested.
82-21 92-59 110-21	Mighty River Power Ltd Contact Energy Ltd Energy Efficiency and Conservation Authority	Policy EI 1B regarding promoting the use and development of renewable energy resources	Support	NZGA fully supports the intent of this policy. We agree with a revision of the heading to help distinguish between resources and uses to read "Promoting the use and development of renewable energy sources". Similarly we support the other suggestion of EECA as blending several views and providing greater context to the policy.
14-17	Powerco Ltd	Policy EI 1B regarding transmission of renewable energy from its source to the point of demand	Support	Some geothermal electricity is transmitted internally within the region as well as inter-regionally via Transpower's network. Significant investment has been required recently in EW's area to enable adequate transmission of geothermal electricity and some investment will be required in the BOP area also.

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110-23	Energy Efficiency and Conservation Authority	Policy EI 3B regarding protecting regionally significant infrastructure	Support in part	EECA is correct in pointing out that renewable energy is a national priority so is of both regional and national significance. However it is not correct to make the policy only apply 'regionally and nationally' significant infrastructure. For most cases if infrastructure is significant nationally it will be significant regionally so the 'regional' heading is adequate. The explanation can bring in the message of the national significance and priority of renewable electricity generation
82-24	Mighty River Power Ltd	Policy EI 4B regarding recognition of the benefits of infrastructure and the use and development of renewable energy	Support	The goes back to a distinction being required between a resource and its 'use and development'. Thus we favour a change in heading to reflect "use and development"
110-24	Energy Efficiency and Conservation Authority	Policy EI 4B regarding an expansion of policy part (b)	Support in part	See comments regarding submission 110-23 as to why we do not support heading and policy (a) being changed to refer to "regionally and nationally" significant infrastructure. However we support changes to part (b) referring to energy sources type and location, reducing dependency on non-renewable energy sources, and reducing dependency on the national grid and reducing transmission losses.
83-23 110-25	Te Tumu Kaituna 14 Trust Energy Efficiency and Conservation Authority	Deletion of Policy EI 5B regarding giving priority to avoiding adverse effects of regionally significant infrastructure on matters of national importance.	Support in part	We agree that the RPS should not reprioritise aspects set out in the RMA itself. Decision makers should have the option to consider efforts to avoid, remedy or mitigate as per the RMA. There are aspects raised by EECA that are not acknowledged in the policy. The simplest solution is deletion of the policy rather than amendment.

Submission Number	Submitter Name	Section Reference	Support/Oppose	Reasons
92-36 151-2	Contact Energy Ltd Environment Waikato	Substantial replacement of Part 3\3.1\geothermal resources policies with policies based on those of Environment Waikato	Support	NZGA fundamentally supports substantial alignment of the RPSs between EW and BOPRC. Note that comments on the following geothermal resources policies assume that such substantial alignment will not be chosen.
151-7	Environment Waikato	Part 3\3.1 Geothermal Resources Policies to include a policy recognising Geothermal classification system as a management tool	Support	The alignment of system classifications is a significant step towards general alignment. This policy establishes the tool for use in the rest of the RPS. There is possibly no need to actually list fields under categories under this policy, with the exception of Rotorua which sits in its own classification.
80-11 82-26 110-26	Genesis Energy Mighty River Power Energy Efficiency and Conservation Authority	Part 3\3.1/ Policy GR 1A regarding protecting geothermal features with diminished protection for systems identified for development	Support	BOPRC has identified Group 3 as available for development so this classification should not face the full protection measures currently outlined
151-20	Environment Waikato	Policy GR 1A should have reference to unclassified systems removed if systems are classified as per 151-7	Support	If all systems re classified then a reference to an unclassified system is meaningless. The suggested words by EW make it clear that research activity can take place in Research Systems.

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151-21	Environment Waikato	Policy GR 1A should also reference action with respect to geothermal features for Development and Low Temperature Systems	Support	It should be clear that the appropriate treatment for development systems (independent of temperature) is that remediation or mitigation.
151-23	Environment Waikato	Policy GR 2A regarding use of System Management Plans	Support	NZGA supports clarification around restriction of System Management Plans to large scale developments. Such plans are likely to be unwieldy for the dozens of domestic users across the low temperature systems in the BOP and would act as a deterrent to development.
92-18	Contact Energy Ltd	Policy GR 2A regarding encouragement of geothermal reinjection	Support	NZGA supports a policy of encouraging reinjection of brine. As per Contact's recommendation an explanation of why this may not be possible or efficient should be included in the explanation.
151-24	Environment Waikato	Policy GR 2A regarding reinjection and a Discharge Strategy	Limited support	Overall the policy suggested by EW is too constraining, forcing reinjection independent of system classification and development considerations. The concept of a Discharge Strategy is useful particularly for large-scale developments.

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92-19	Contact Energy	Policy GR 3A regarding concepts of sustainability	Support	We support the view of Contact that it is sustainable management of the Regional Geothermal Resource that needs to be promoted and this is achieved through protection applied to some systems.
92-22	Contact Energy	Policy GR 3A (h) regarding scale of protection given to various system classifications	Support	For Development, Limited Development <u>and Low Temperature</u> geothermal systems significant effects should be remedied or mitigated
110-28	Energy Efficiency and Conservation Authority	Regarding Policy GR 3A being overly restrictive and needing a refocus	Support	We support the concept of refocusing the provisions around sustainable use of geothermal resources to have regard for system characteristics and values, <u>scale of development</u> , principles of best practice allocation, efficiency of use of resources and measures to avoid, remedy or mitigate adverse effects.
151-31	Environment Waikato	Policy GR 4A regarding repetition of policy GR 1A and inclusion of new policies around interactions with people and other land uses	Support	We note that 2 of the 4 policies are a repetition of Policy GR 1A so support the retitling of this policy and deletion of the redundant clauses.

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82-29 92-25	Mighty River Power Ltd Contact Energy Ltd	Policy GR 5B regarding information requirements of developers	Support	NZGA supports the collection of key information from developers. We also support the strengthening of confidentiality requirements around commercial information or culturally sensitive information
92-26 92-27 92-28 110-30 149-26 151-33	Contact Energy Ltd Energy Efficiency and Conservation Authority Bay of Plenty Regional Council Environment Waikato	Policy GR 6B regarding managing geothermal use, takes and discharges	Support	There are a number of useful suggestions to improve the policy in this area
92-30	Contact Energy Ltd	Policy GR 7B regarding integrated geothermal system management and a threshold trigger	Support	The integrated management plan is currently for an undefined significant development. We support the suggestion by Contact that this be based on a value within EW's RPS – in particular a trigger of take or discharge at 6,000 tonnes per day.
92-32 149-27	Contact Energy Ltd Bay of Plenty Regional Council	Policy GR 8B regarding discharge strategies, a threshold trigger and encouraging downstream energy extraction	Support	NZGA does not want to discourage small scale developments so supports the concept of a threshold trigger for the preparation of Discharge Strategies with the 6,000 tonnes per day trigger seeming to be appropriate again. Similarly we would like encouragement of low temperature geothermal development say in cascade form, where this is technically possible.

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82-32 92-34 151-36	Mighty River Power Ltd Contact Energy Ltd Environment Waikato	Policy GR 9B regarding protecting significant features by maintaining geothermal systems	Support	Development will cause change to a system so generally it will not be possible to maintain system characteristics in a partially or fully developed field. We support a number of suggestions for improving the wording of this section and particularly for taking the full force of this policy away from Group 3 developments
42-20 82-33 110-33	TrustPower Ltd Mighty River Power Ltd Energy Efficiency and Conservation Authority	Part 3\3.1\ Policy IR 1B regarding use of adaptive management as a tool for managing geothermal resources using a precautionary approach	Support	The three submissions referenced reflect a common view that adaptive management is an effective tool for managing the uncertainties in geothermal development.
92-62	Contact Energy	Part 3\3.1\ Policy IR 6B regarding promoting consistent and integrated management across jurisdictional boundaries, especially aligning with EW and with a minor wording change related to 'geothermal systems'	Support	Alignment with EW geothermal policy has already been emphasised. Such policy requires the use of the term 'geothermal system' rather than 'geothermal field' in this policy.
151-5	Environment Waikato	Part 3\3.1\poicy IW 2B and MN 3B regarding the relationship that Maori have with geothermal resources and their role of kaitiaki	Support	NZGA recognises the key role of Maori in future developments. NZGA also recognises the relationship that Maori have with these resources and the sense of kaitiakitanga which is felt by iwi and needs an expression.

Submission Number	Submitter Name	Section Reference	Support/Oppose	Reasons
80-20 92-71	Genesis Energy Contact Energy Ltd	Part 3\3.1\policy WL 11B regarding management of reverse sensitivity effects in rural environments to include reference to regionally significant infrastructure or geothermal systems	Support in part	Most geothermal developments are likely to be in rural environments. Hence we support some sort of inclusion of specific references to geothermal energy or renewable energy. We note that 'regionally significant infrastructure' does not yet cover geothermal energy supply for non-electricity generation as for example at Kawerau where heat is supplied to the mills so Genesis' solution will only be adequate if the definition of regionally significant infrastructure is expanded.
92-73	Contact Energy Ltd	Part 3\3.1\policy WQ 2A(c) regarding limits on groundwater but making it clear that this does not apply to geothermal water	Support	The intention of the policy is to protect groundwater but inclusion of words '(excluding geothermal water)' helps to avoid possible confusion.
110-41	Energy Efficiency and Conservation Authority	Part 3\3.1\policy WQ 3B regarding taking account of the value of water for electricity generation when considering allocation of water	Support	Decision makers should take into account the value of water (for hydro or geothermal) when considering allocation of water. The NPS on renewable electricity generation makes this a requirement.
82-42 80-22	Mighty River Power Ltd Genesis Energy	Part 3\3.1\policy WQ 4B regarding exclusion of geothermal development from a common expiry date for the taking of water	Support	Geothermal developments are high capital cost long-life projects for which long periods are required before project payback. Consents to cover the payback period are required often as a condition of funding. The exclusion of geothermal energy from this requirement needs to be made general rather than being limited to requiring authorities. Similar considerations apply to the suite of renewable energy forms so a broader exclusion should be considered.

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29-13	Rotorua District Council	Part 3\3.2 regarding provision of information on existing users to assist integrated management and possible collaboration	Support	NZGA is supportive of the supply of information to potential users of geothermal resources. Often individual wells for domestic situations may be more than adequate to supply multiple users. Availability of this information may help with more efficient use of the resource and assets developed in relation to the resource.
151-40 92-67	Environment Waikato Contact Energy	Part 3\3.2\3.2.2 guiding methods regarding the identification and classification of geothermal systems	Support	This goes back to the foundation of a portfolio approach. From this, the various systems will need to be identified and classified where possible. NZGA supports the use of maps for geothermal systems in a similar manner to the use of maps elsewhere in the RPS. We note that Contact has suggested mapping as being a policy under Matters of national Importance, but perhaps it is better here as a method.
92-37 151-39	Contact Energy Environment Waikato	Part 3\3.2\Method 24 regarding identification and classification of geothermal features	Support	See other references to the need for consistent terminology. We support the use of 'significant geothermal features'
29-14	Rotorua District Council	Part 3\3.2\Method 25 regarding provision of environmental education programmes	Support	We agree that a wider range of educators should be referenced including tangata whenua

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25-78 149-41	Western Bay of Plenty District Council Bay of Plenty Regional Council	Part 3\3.2\Method 30 regarding provision of information and guidance on natural hazards	Support	NZGA supports the provision of information, particularly on geothermal hazards. We agree with the District Council that many of the listed hazards are actually at the regional level so the appropriate source of that information should be the Regional Council itself. We agree with the regional Council that the hazards associated with geothermal can be wider than hydrothermal eruption and agree with their expansion of the list.
27-49	Eastern Bay of Plenty Branch Royal Forest and Bird Protection Society NZ Inc	Appendix A – Definitions\new definition of 'Enhance Geothermal System'	Support	See earlier comments. NZGA can help develop a definition.
92-46	Contact Energy Ltd	Appendix A – Definitions\new definition of 'Geothermal features'	Support	We agree that not every geothermal feature should be regarded as significant so there may be some places in the RPS that appropriately refer to geothermal features as opposed to significant geothermal features.
92-43 151-17	Contact Energy Ltd Environment Waikato	Appendix A – Definitions\Geothermal features of significance	Support	See other comments on consistency of terminology. The correct term to use consistently through the report is 'significant geothermal feature' as per Annex A

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151-41	Environment Waikato	Appendix A – Definitions\Geothermal System	Support in part	Given a portfolio approach, a careful definition of 'geothermal system' is required to identify the separate systems for development or protection. The definition given by EW is still not quite adequate as it requires the system to not be hydrologically connected to another water body. There may be a groundwater body that overlies multiple systems and is partly fed by these systems. The definition of a geothermal system needs to exclude this groundwater hydrological connection.
134-123	Horticulture New Zealand, ...	Appendix A – Definitions\Regionally significant infrastructure	Support in part	While we appreciate the specific recognition of geothermal as regionally significant, we recognise that all energy generation in the region from any source including non-renewable sources could be regionally significant so favour the current wording in the Proposed RPS. What is not captured in the current definition is geothermal heat supplies as at the Kawerau mills, so an additional bullet point to cover this is required: "pipelines for the distribution of geothermal energy"
92-45	Contact Energy Ltd	Appendix A – Definitions\Sustainable use	Support	This goes back to the foundational issue of a portfolio approach to the geothermal resource. Full protection of some resources ensures sustainability of the resource overall, so there is no need to define sustainable use of systems identified for development. While the intent of a 30 or 100 year period may be to ensure some inter-generational longevity, the period is still arbitrary. Developers will be incentivised to maximise the life of the development because of the high capital cost but long return periods. However, ultimately sustainability of the regional resource is achieved through the protection of specified systems with key characteristics. Hence we support deletion of the definition of sustainable use.
149-51 149-52	Bay of Plenty regional Council	Appendix A Glossary Annex A	Support	NZGA is happy with these definitions

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151-42 151-8 151-9	Environment Waikato	Throughout –consistently use the phrase 'significant geothermal feature' as defined in Appendix A Glossary Annex A	Support	Consistent use of defined phrases avoids confusion