

To: Aileen Gallagher – aileen.gallagher@ea.govt.nz

From: Dr Helen Brookes – Lower Waitaki Valley President and Trustee Waitaki Power Trust.

Subject: Meridian Energy, Waitaki Hydro Lakes operating rules and Waitaki Dam Power Station consent conditions.

Date: 14th July 2020

Thank you for providing us with your email address which will ensure that this email will not be classified as 'spam'!

On July 1st 2020, the Otago Daily Times reported the Electricity Authority has concluded that during the early December 2019 Waitaki Catchment flood, Meridian Energy.

“ Close to reduce its generation in order to spill water.... Thus holding up (electricity) prices in the South Island “(O.D.T, 1-7-2020,)

There is however, a fundamental question that requires an answer to validate the contention that Meridian was **deliberately and intentionally** reducing generation while spilling water under flood conditions.

The question specifically relates to whether Meridians operational management of flood flows was in accordance with the terms and conditions of the 1990 Operating Rules for Waitaki Power Stations and the Resource Consents Meridian Energy holds to operate the Waitaki Dam Power Station, by way of a specific example.

The Authority may already have the relevant documents and thus be in a position to resolve the compliance issue. As such, the Authority's spokesman Chief Executive James Stevenson-Wallace will know whether or not he was an sound ground when describing Meridians management of the December flood flows as an intentional and deliberate act.

None the less, the legitimacy or otherwise of Meridians flood flow management is also integral to the flow on effects to the Lower Waitaki River. Flood spills, as discharge to the Lower Waitaki River significantly increased downstream erosion which has continued during the following six months and is now on going.

Indeed the downstream erosion rate has reached the stage that Transpower too, is now a potentially affected party, with questions being asked as to the security of at least one pylon that is part of Transpower Sub-transmission Lower Waitaki/ South Canterbury networks.

Accordingly, in the event that the electricity Authority does not have full information relating to the manner in which Meridian Energy is required to operate when generating and spilling water in the Waitaki Catchment, please find attached at appendices A,B and C copies of the documentation referred to as above.

Also attached at appendix D are like graphs showing rainfall at Mount Cook over-laying discharge measures in cumecs at Waitaki Dam covering a six month period between August 2019 and Mid-January 2020, plus updated comment to June 2020 by Environment Canterbury.

With respect to the timelines of NIWA's warnings about predicted extreme rainfall events at Mount Cook it is relevant to note that at a recent stakeholder meeting at Waimate on 9th July 2020 when a question was asked relating to the timelines of information Meridian receives from NIWA relating to predicted weather events Meridians representative answered as follows:

"NIWA provides Meridian notice of predicted extreme rainfall at Mount Cook around 7 days ahead of time and by 3 days out Meridian is relatively confident as to whether or not the predicted rainfall even will occur" (Jeff Page, Meridian Energy, Recorded meeting minutes 9th July 2020)

Yours Sincerely

Helen Brookes

Lower Waitaki Valley, Land Owner.