



Submission from

Raukawa

To

The Electricity Authority Te Mana Hiko

On

**Consultation Paper – The Future of New Zealand’s
Power System**

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The Electricity Authority Te Mana Hiko
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Tēnā koe

SUBMISSION ON THE FUTURE OPERATION OF NEW ZEALAND'S POWER SYSTEM CONSULTATION PAPER

INTRODUCTION

1. Raukawa thanks the Electricity Authority Te Mana Hiko ("EA") for the opportunity to make a submission on the future operation of New Zealand's power systems consultation paper.
2. This submission is made on behalf of the Raukawa Charitable Trust (**RCT**) which is a subsidiary of the Raukawa Settlement Trust (**RST**). RST represents 16 marae and is the post-settlement governance entity (**iwi authority**) for Raukawa.

WHO RAUKAWA ARE

3. Raukawa is a large iwi associated with a significant area of the central North Island and is a key area for energy and primary production for the country.
4. The Raukawa takiwā is represented by four pou: Te Pae O Raukawa, Wharepūhanga, Maungatautari and Te Kaokaoroa O Pātetere. These four areas include Mōkai, Atiamuri, Whakamaru, Mangakino, Arapuni, Tokoroa, Putāruru, Tīrau, Tapapa, Matamata, Kēmureti (Cambridge), Kihikihi and Te Awamutu. The Raukawa takiwā and area of association is shown in **Appendix One**.
5. The Raukawa takiwā has been the focal point for substantial infrastructure development over the last 150 years. Our central location in the North Island has led to the development of an extensive network of dams and other energy and power infrastructure that now connects across and through our takiwā both internally and externally.
6. This working landscape provides energy and power services to the local, regional, and national economy and their communities. However, these wider benefits (both regionally and nationally) have come at significant cost to Raukawa. The scale of land for early land schemes and confiscation of land for public works has decimated the Raukawa relationship with our lands and left us with a faction of our ancestral whenua within our control.
7. Regarding energy and power systems, some of the issues Raukawa currently in our takiwā include (but are not limited to):
 - a. Historic lack of Raukawa involvement in planning for new infrastructure and significant system/network upgrades.
 - b. Continuing reliance upon traditional generation methodologies.
 - c. Continuing reliance upon traditional energy sources.
 - d. Continuing reliance upon traditional grid and network models.

RAUKAWA FEEDBACK

8. RCT acknowledge and recognise the need for New Zealand to transition to a sustainable energy future which requires large scale, grid connected, renewable energy generation. However, this is not to be achieved at the expense of security and equity.

9. RCT are embarking on a journey to address energy hardship within our takiwā, primarily focusing on the South Waikato region. The Raukawa Energy Innovation Project (“REIP”) focuses on the long-term goal of providing energy solutions across all three areas of sustainability/reducing emissions, security and affordability.
10. RCT has also developed a Marae resilience strategy which looks to increase the resilience of marae with one component being the development of small and community-scale renewable electricity generation infrastructure and associated storage capability.
11. RCT advocate for smaller grids and networks to build resilience into communities, and promote the use of innovation, clean, sustainable, and future-focused systems always. Infrastructure grids and networks are innovative, smart, efficient, effective, robust in design and structure, and serve our community needs and aspirations well.
12. Given the statutory objectives of the EA, RCT supports the development of a future power system that:
 - a. enables clean, green and renewable energy technologies.
 - b. promotes the uptake of smaller grids and infrastructure systems.
 - c. provides systems resilience for our Raukawa uri and wider communities.
 - d. eliminates energy poverty and improve energy affordability for our communities.
 - e. meets the Crown’s treaty obligations with respect to natural assets and creates meaningful opportunities for our Iwi, hapu and marae to engage, including commercially, to ensure our communities benefit from the energy transition.

Key Drivers of Change to the Power System Operation in NZ over the coming decades

13. RCT agree and support the six identified drivers of change to power system operations.
14. Through the REIP, RCT are looking to empower our iwi and community in implementing solutions to address energy poverty and promote mana Motuhake and tino rangatiratanga through sustainable energy transition. Raukawa are seeking to reduce energy hardship as well as seek opportunities to engage commercially in the energy sector.
15. RCT support the transition development of small-scale, or in some cases community-scale, renewable electricity generation infrastructure and associated storage capability. This would have the dual benefit of reducing reliance on the electricity generation and transmission network, particularly in climate induced or civil emergencies and ensuring that the generation of electricity for marae and papakainga contributes to Aotearoa’s greenhouse reduction targets.

Do you consider we need an increased level of coordination of network planning, investment and operations across the New Zealand power system?

16. Yes. RCT agree that there is an increased need for coordination of network planning, investment and operations across the NZ power system.
17. As highlighted in the consultation document through the six drivers of change and emerging system complexities, greater coordination is needed. There are coordination challenges at both a regional and national level, with an increasingly complex web of initiatives, policy directives and energy legislative reform that are all contributing (or will contribute) to these challenges. For example, the proposed Fast Track Approvals Bill could significantly de-rail such coordinated efforts and lead to detrimental outcomes for the consumer and the environment.
18. RCT is concerned that if there is inadequate or poorly managed coordination between private and public energy sectors, regulators and Crown agencies and Iwi, it could result in:
 - a. Increased costs to consumers because of inefficient investment choices and/or high transaction costs. This risks further energy hardship in our takiwā.

- b. Sub-optimal land use choices for energy infrastructure, for example in areas with highly productive soils, such as in the Raukawa takiwā, if coordination with local planning authorities is lacking.
19. Although the EA does not have a view on whether more coordination is needed when it comes to network planning to ensure the most efficient level of network investment is achieved for consumers, RCT encourage the EA to adopt the next step approach noted in clause 5.47 to craft an accurate problem definition and identify possible options to address the problem.
20. RCT remains open to engage and collaborate with EA and MBIE Energy to explore options to address the problem. We have made good progress through the Raukawa Energy Innovation Project, Tahatū o te Rangi, Motai ki te Whenua Raukawa Climate Change Strategy and the Raukawa Marae Resilience Plan which could help enhance and support the continued development of the national energy strategy.
21. We would again like to thank you for the opportunity to provide our feedback to you.

Nāku noa, nā



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Appendix One – Raukawa Takiwā and Area of Association

