

NGATI TUWHARETOA GEOTHERMAL ASSETS LTD

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Ministry for the Environment
By E-mail: emissionstrading@climatechange.govt.nz

Submission on the Climate Change (Stationary Energy and Industrial Processes) and (Unique Emissions Factors) Regulations 2009 (Drafts for Consultation)

Ngati Tuwharetoa Geothermal Assets (NTGA) appreciates the opportunity provided by the Ministry for the Environment to comment on the draft Regulations.

NTGA submits that the Regulations:

1. must only apply to CO₂e gases that are emitted to the atmosphere;
2. exclude CO₂e emissions below a minimum volume (no less than 1,000tpa). The cost of determining emissions should not be disproportionate to the cost of the Emissions Trading Units;
3. at Schedule 2, table 5
 - a. are helpful for those that do not wish to have unique emissions factors determined;
 - b. has an incorrect emissions factor for "Kawerau Industrial Use" of 0.1024. The emissions from Industrial Use should be similar to Kawerau II power plant, which has the factor of 0.0275;
 - c. the emissions factor in Part A for Wairakei/Tauhara (0.0055) appears to be incorrect, as it has the same factor as that for the steam volumes. As mass flow volumes are always substantially greater than the steam volumes, the CO₂e factor should be substantially less.

NTGA considers that it is important to have an over-arching principle that CO₂e applies only to those gases emitted to the atmosphere. Each of the emissions factors needs to be tested against this principle.

NTGA is also concerned to ensure that emissions factors for 2-phase geothermal fluids reflect the actual CO₂e gases emitted to the atmosphere, as it intends in the future to be supplying geothermal energy from 2-phase to industry at Kawerau.

Please include NTGA in any further consultation / discussion on these Regulations.

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Sincerely



P J Brown

For Strettons, Managers to Ngati Tuwharetoa Geothermal Assets Ltd

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