



meridian

15 December 2008

Ministry for the Environment  
Wellington 6143

By email: [emissionstrading@climatechange.govt.nz](mailto:emissionstrading@climatechange.govt.nz)

Dear Sir / Madam

**Climate Change (Stationary Energy and Industrial Processes) Regulations 2008**

1. Meridian Energy ('Meridian') appreciates the opportunity to make submissions on the Climate Change (Stationary Energy and Industrial Processes) Regulations (the 'Regulations') which contains significant measures to implement the government's climate change policy.
2. Meridian anticipates that it will be a Stationary Energy and Industrial Process participant in the Emissions Trading Scheme, in respect of its business unit Energy for Industry (EFI) which combusts waste to generate industrial heat.
3. Meridian conducts a full collection, calculation and disclosure of all greenhouse gas emissions attributable to the Meridian Energy Group, including EFI on an annual basis. Half-yearly GHG inventories are also reported six monthly for selected business unit, including EFI. All Meridian Energy inventory reports are developed to comply with the requirements of the ISO 14064-1:2006 standard for greenhouse gas accounting, and the Greenhouse Gas Protocol (an accounting and reporting standard developed by the World Business Council for Sustainable Development). EFI holds certification under Landcare Research's Certified Emission Management and Reduction Standard (CEMARS) scheme.
4. Meridian anticipates continuing to measure and report its greenhouse gas footprint in future years. On this basis, Meridian anticipates that additional costs incurred in compliance with these regulations would be negligible.
5. Meridian welcomes the availability of a standardised emission factor for combustion of waste.
6. Meridian recognises that the operation of the ETS, including through these regulations, will have implications for the price of thermal fuel inputs to generation of stationary energy and

industrial processes. A high degree of transparency about the magnitude of carbon price impacts is needed in order for entities to evaluate behaviour change options including the efficacy of opting in to the scheme as a participant. In the absence of a fully fledged liquid carbon market, or a well subscribed functioning exchange, it would be desirable that disclosure of NZU prices is mandated by regulatory means. Meridian suggests that the Committee give consideration to requiring points of obligation to make an annual disclosure of the average cost of carbon incurred and passed downstream.

7. If you have any queries in relation to this submission please contact me.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Gillian Blythe', written in a cursive style.

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