



MAJOR ELECTRICITY USERS' GROUP

5 October 2007

Minister for the Environment

Comments in support of submission on Transpower's notices of requirement and applications for resource consents: 400 kV transmission line and related works call-in

The reasons for my/our submission are:

1. The members of the Major Electricity Users' Group (MEUG) have reservations regarding the wise use of resources and sustainable development of the proposed 400 kV transmission line and associated works compared to alternative proposals to cater for forecast electricity demand growth in Auckland and north of Auckland.
2. A list of MEUG members and our Mission Statement is attached in a separate memorandum dated 17th July 2007.
3. On 5th July 2007 the Electricity Commission (EC) announced their final decision to approve the proposal in terms of their powers under the Electricity Act. On the same day MEUG issued a media release stating our view that a 220 kV line would have been a better solution than the 400 kV line. A copy of that media release is attached.
4. Since that date Transpower have posted their resource consents and the call-in process has commenced. Other events have also strengthened the case for a 220 kV transmission line relative to that of a 400 kV line. For example RMA consents relating to proposed gas fired power station(s) at Rodney have been lodged and various EC and Transpower related activities have used lower electricity demand forecasts. The views of MEUG expressed in the media release of 5th July 2007 therefore remain unchanged apart from:
 - a) While we believe a 220 kV line to be a better use of resources than the proposed 400 kV line proposal, there may also be other proposals that are better than the 220 kV alternative. The Transpower proposal has failed to evaluate those alternatives; and
 - b) MEUG have in this submission opposed all the consents requested by Transpower. If in viewing submissions and evidence from Transpower and other parties that demonstrate from an overall national benefit or sustainable development perspective the 400 kV proposal is indeed the best of all feasible options; then we reserve the right to alter our position.

Yours sincerely

Ralph Matthes
Executive Director