

Before the Expert Panel

Under the Fast-track Approvals Act 2024 (**FTAA**)

And

In the matter of an application for approvals by Nova Energy Limited to establish and operate a 300-megawatt solar plant over 565 hectares of an 868-hectare site to the east of Twizel Township, Mackenzie District, within the Canterbury region
(**Twizel Solar Project**)

Memorandum of counsel on behalf of Nova Energy Limited to the
Expert Panel

Dated 2 October 2026

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MAY IT PLEASE THE PANEL

INTRODUCTION

1. As you know, we act for Nova Energy Limited (**Nova**) in respect of its substantive application (**Application**) under the Fast-track Approvals Act 2024 (**FTAA**) for the Twizel Solar Project (**Project**).
2. On 1 October 2026 the Panel issued RFI#1 in relation to ecology and landscape matters. The deadline for responses is 5pm on 9 October 2026.
3. Nova respectfully requests that the Panel exercise its discretion to suspend the processing of the Application in accordance with section 64 of the FTAA.
4. Nova seeks that the suspension take effect from Friday 2 October 2026. Nova provisionally anticipates that it will request that processing is resumed on Friday 23 October 2026 but will update the Panel as soon as the proposed date can be confirmed and will lodge a formal request for resumption of processing under section 65 of the FTAA at the relevant time.
5. The reason for this request is because Nova's technical expert team requires additional time to prepare a robust and complete response to the ecology questions in the RFI. In particular, more time is required because:
 - (a) A number of the questions are complex and more time will be required to provide a fulsome response to them;
 - (b) Question 1.2 requests updated, ground-truthed vegetation mapping. Additional time is required to consider this request and timing of any further survey work; and
 - (c) A number of Nova's ecology experts are on leave next week due to school holidays, so are unavailable to prepare responses in the requested timeframe.
6. Nova has no objection to the Panel and its advisers, or the EPA, continuing work on the Application during the suspension period.

7. Assuming that Nova requests resumption of processing on Friday 23 October 2026, the following timeframes would apply (noting that 26 October is Labour Day and 26 April is Anzac Day and non-working days):
- (i) Invitations to comment would need to be issued by 27 October 2026;
 - (ii) Nova's response to RFI#1 would be due on 2 November 2026;
 - (iii) Comments from s53 parties would be due by 24 November 2026;
 - (iv) Nova's response to comments would be due by 1 December 2026; and
 - (v) the Panel's decision on the Application would be due on 27 April 2026.
8. Nova is grateful for the Panel's attention to this matter.

DATED this 2nd day of October 2026



Stephanie de Groot / Kate Storer
Counsel for Nova Energy Limited