

**UNDER THE** **FAST-TRACK APPROVALS ACT 2024**

**IN THE MATTER OF** an application for replacement resource consents in relation to the Tekapo Power Scheme

**BY** **GENESIS ENERGY LIMITED**  
**Applicant**

**AND** **ROYAL FOREST AND BIRD PROTECTION SOCIETY OF NEW ZEALAND INCORPORATED**  
**Invited Party**

---

**MEMORANDUM OF COUNSEL FOR THE ROYAL FOREST AND BIRD**

**PROTECTION SOCIETY OF NEW ZEALAND INCORPORATED**

**20 October 2025**

---

---

**Royal Forest and Bird Protection Society of New Zealand**

Solicitor Acting:  
T C T Williams

[REDACTED]

Counsel:  
P D Anderson

[REDACTED]

**MAY IT PLEASE THE PANEL**

1. The Royal Forest and Bird Protection Society of New Zealand Incorporated has received and considered the draft decision and conditions.
2. Forest & Bird has no comment to make on the draft decision or conditions.
3. Forest & Bird maintains the views set out in its comments and evidence, including the response to Minute 6 (memorandum and evidence).

Dated: 20 October 2025

A handwritten signature in black ink, appearing to read 'P Anderson', is enclosed within a light grey rectangular box.

---

P Anderson

Counsel for Royal Forest and Bird Protection Society of New Zealand Inc