

File ref: **FTAA-2510-1120**

4 May 2026

Canterbury Regional Council  
Genesis Energy  
Meridian Energy (the Applicant)  
Electricity Authority

Tēnā koe

**Request for information 1 in relation to the Lake Pūkaki Hydro Storage and Dam Resilience Works project under the Fast-track Approvals Act 2024**

The Lake Pūkaki Hydro Storage and Dam Resilience Works Expert Consenting Panel (the Panel) has directed the Environmental Protection Authority (EPA) to request further information from you under section 67 of the Fast-track Approvals Act 2024 (FTAA), relating to the Lake Pūkaki Hydro Storage and Dam Resilience Works application.

At the direction of the Panel, the EPA is seeking information to assist the Panel to make determinations for the purposes of section 81(1) of the FTAA as follows.

**RFI No.:**       **1.A – Dust Management**

**To:**             **Applicant; Canterbury Regional Council**

**Due Date:**     **15 May, 2026**

1. The Panel considers it would be assisted by the conferencing of the air quality experts for the Applicant and the Canterbury Regional Council to produce for the Panel (a) a joint statement (or similar), detailing their areas of agreement and disagreement with respect to dust management during the rock armouring works and (b) an updated dust management plan (**DMP**) and conditions for the rock armouring discharge to air consent sought. In particular, the Panel would be assisted by the experts conferencing on the following matters:

Conditions

2. The Panel considers that the currently proposed conditions are lacking in detail, with several commonly addressed matters deferred to the DMP. The experts are requested to discuss the

following matters and to consider whether including them in proposed conditions of consent would result in more certain and enforceable conditions.

- A certification procedure for the DMP, recognising that the evidence is that the contractor will need to be involved in finalising the plan.
- Including good practice dust control requirements, such as water application by a water cart (held on site during the works period), an on-site speed limit, road sweeping/cleaning requirements for SH8, and revegetation/rehabilitation.
- Use of water storage tank/s on site to assist with prompt dust control.
- Specifications for the on-site weather station to monitor wind and rainfall.
- Wind speed and direction trigger levels and actions.
- Real-time PM<sub>10</sub> monitoring with trigger levels and actions.
- Monitoring and control of visible dust emissions in relation to SH8.

#### Dust Management Plan

3. The Panel considers that the DMP would benefit from additional detail in some areas. The experts are requested to consider whether including the following matters in the DMP, detailing how the conditions will be implemented, would result in more effective DMP.
  - A speed limit for vehicles on the site.
  - Real-time PM<sub>10</sub> monitoring and trigger levels.
  - Availability of water for dust control and use of on-site storage tank/s.
  - Regular road sweeping/cleaning of SH8.
  - Adding a map showing the location of sensitive receptors, including addition of the Nohoanga near the Pines freedom camping area.
  - Consideration of dust effects on cyclists, walkers and traffic.
  - Inclusion of SH8 as a potentially affected receptor in relation to visible dust emissions.
4. The joint statement sought should also address any other outstanding matters in dispute between the experts, including with respect to the final content of the conditions and the DMP.

**RFI No.:** 1.B

**To:** Electricity Authority – Power System Issues

**Due Date:** 22 May, 2026

5. The Panel is grateful for the comments provided by the Electricity Authority (**EA**). There are two matters arising from the detailed comments received from Transpower Limited (the System Operator (SO)), and Genesis Energy Limited (GEL) (the operator of Tekapo B) about which the Panel would appreciate further information from the EA.

#### Competing modelling of benefits and costs of project

6. In broad terms, following the receipt of comments, the Panel now has three different appraisals of the economic benefits and costs of the project (Concept Consulting Limited (David Weaver and Simon Coates), John Culy, and Grant Telfar and Brent Layton).

7. The Panel would appreciate the EA reviewing this further information and advising the Panel whether any aspects of it cause the EA to depart from its assessment of the overall costs and benefits of the proposal as set out in its section 53 comments to the Panel.

Contingent storage and the role of the SO

8. The Panel has received detailed comments from Transpower Limited about the importance of contingent storage in the New Zealand power system and its role as SO. In response, the Applicant has offered a competing analysis on both those matters (refer the following materials for the Applicant in response: Legal Submissions, Evidence Rory Blundell).
9. The Panel would be assisted by any further information or comments about these two matters from the EA.

**RFI No.: 1.C – Tekapo Tailrace Issues**

**To: The Applicant; Genesis Energy Limited**

**Due Date: 15 May, 2026**

10. In broad terms, following the receipt of comments, the Panel now has two fundamentally divergent engineering assessments of the structural state of the temporary Tekapo B tailrace weir and discharge channel structure (Damwatch, WSP), resulting in two different recommended approaches to managing the potential risk of its failure during lowered lake levels. Damwatch recommend a ‘reactive’ (i.e., monitor and repair) approach to managing the risk of failure, whereas WSP recommend a ‘pro-active’ (i.e., make sound first) approach. In determining which approach is to be preferred on the evidence, the Panel would be assisted in further information from the Applicant and GEL on the following matters:
  - a. Regardless of which approach to risk is preferred, does the Applicant have sufficient legal rights to access the tailrace structure for repair or reinstatement without agreement from GEL? If no rights exist, how would a condition requiring either repair or reinstatement be legally effective?
  - b. What obligations arise under the Building Act 2004 for recommissioning of the weir and discharge channel structure, including either the repair or reinstatement options? How do the parties consider those obligations can be met in either scenario?

**RFI No.: 1.D – Ecology Issues**

**To: The Applicant**

**Due Date: 15 May, 2026**

11. The assessment of ecological effects on the Tasman Delta and other wetlands, and the response to Dr Susan Walker, both reason that the ecological effects of lowering the lake level below 518m

RL are permitted, because of rules in the relevant plan allowing lake lowering as a permitted activity in certain circumstances, and thus the identified effects on these wetland features can be disregarded. Understanding that application of the permitted baseline approach per s 104(2) of the Resource Management Act 1991 is at the discretion of the decision-maker, the Panel asks the Applicant to provide an assessment of ecological effects on these wetland features on the basis that a lake level of 518m RL is the existing environment and no permitted baseline is applied.

12. With respect to the Tasman Delta, the evidence of Amy Callaghan, in response to Dr Susan Walker (DOC) and Dr Jean Jack (CRC) states:

[1.19.7] *It is my view that any residual effects are sufficiently small both in terms of the extent and duration of effect that any offsetting measures or environmental compensation are not warranted. A monitoring agreement is already in place with DOC in relation to monitoring of Kaki/Black Stilt and Isolepis basilaris (which grows in wetland turfs) within the Tasman Delta.*

[1.19.8] *... the low scale and short duration of the effects do not justify taking on the challenges associated with implementing an additional monitoring programme or similar in such a short period and the limited environmental benefits that could arise from that monitoring.*

In the event the Panel does not accept these opinions and considers that there are residual adverse effects and a requirement for monitoring:

- (a) What measures does the Applicant intend the Panel to have regard to in the context of NPS-REG, Policy F(5)?
- (b) What would the principal features of a programme to monitor these effects be (i.e., objectives, methods, duration, reporting, response)?

### **Supply of Information**

In accordance with section 67(2) of the Act the party must:

- a) Provide electronic copies of the information or report requested; or
- b) Advise the EPA, with reasons that you decline to provide the information or report requested.

Please provide the further information to the EPA no later than the close of business on the Due Date relevant to you above.

If the information requested is not received, the Panel must proceed as if the request for further information has been declined. Please note, the information will be provided to the Panel, the applicant and every person who provided comments on the application. The information will also be made available on the Fast-track website.

If you have any questions, please contact me by email at [info@fasttrack.govt.nz](mailto:info@fasttrack.govt.nz).

Nāku noa, nā



Awesta Seddiqi

**Application Lead, Fast-track applications**