

**ENVIRONMENT COURT OF NEW ZEALAND
CHRISTCHURCH REGISTRY
I MUA I TE KOOTI TAIAO O AOTEAROA
ŌTAUTAHU**

ENV-2025-CHC-078

In the matter of **AN APPEAL UNDER CLAUSE 14 SCHEDULE 1 OF THE
RESOURCE MANAGEMENT ACT 1991**

And

In the matter of **AN APPLICATION UNDER SECTION 274 OF THE
RESOURCE MANAGEMENT ACT 1991**

Between **MERIDIAN ENERGY LIMITED**

Appellant

And **MACKENZIE DISTRICT COUNCIL**

Respondent

**NOTICE OF GENESIS ENERGY LIMITED'S WISH TO BE A SECTION 274
PARTY TO THE PROCEEDINGS**

Dated: 24 September 2025

BUDDLE FINDLAY

Barristers and Solicitors
Wellington

Solicitors Acting: **David Allen / Chelsea Easter**
Email: david.allen@buddlefindlay.com / chelsea.easter@buddlefindlay.com
Tel 64 4 462 0423 Fax 64 4 499 4141
PO Box 2694 / DX SP20201
Wellington 6011

TO: the Registrar
Environment Court
Christchurch

1. Genesis Energy Limited (**Genesis**) wishes to be a party to the appeal proceedings lodged by Meridian Energy (the **Appellant**) under section 274 of the Resource Management Act 1991 (**RMA**).
2. The proceedings of interest to Genesis are the appeal against parts of the decisions of the Mackenzie District Council (the **Respondent**) on Plan Change 28 to the Mackenzie District Plan ("Hazards and Risks, Historic Heritage and Notable Trees), Variation 1 to Plan Change 26 and Variation 1 to Plan Change 27 (collectively **PC28**), which was publicly notified on 10 February 2025 (the **Decision**).

Nature of the interest in the proceedings

3. Genesis Energy made submissions dated 22 January 2025 (and further submissions on 24 February 2025) generally supporting the notified provisions of Plan Changes 28 and 29 while seeking targeted amendments relating to hydro inundation to protect the ongoing operation, maintenance and upgrade of the Waitaki Power Scheme, including the TPS, from reverse sensitivity and unnecessary regulatory or financial burdens.
4. Genesis has an interest in the proceedings that is greater than that of the public generally as they own and operate the existing Tekapo Power Scheme (**TPS**) in the Mackenzie Basin. Genesis is directly affected by reverse sensitivity effects caused by any development within the hydro inundation zone. These have the potential to significantly affect the TPS operations, forcing Genesis into significant and expensive upgrades to ensure their compliance with Dam Safety Regulations and to protect the safety of people and property.
5. The TPS is a hydro renewable electricity generation scheme located at the head of the Waitaki Valley and comprises two power stations (Tekapo A and B), Lake Tekapo and its associated inflows, and the Tekapo Canal. Together the TPS and power stations operated by Meridian Energy comprise the Waitaki Power Scheme (**WPS**).

6. The TPS operates under a suite of resource consents granted by the Mackenzie District Council and Canterbury Regional Council (Environment Canterbury).
7. Genesis is not a trade competitor for the purposes of section 308C or 308CA of the RMA.

Extent of interest in the proceedings

8. Genesis is interested in that part of the appeal related to PC28 only. Genesis is not interested in that part of the appeal related to PC30.
9. Genesis generally supports the provisions in the Decisions Version of PC28 and is neutral on the changes sought by the Appellant.
10. Genesis' interest in these proceedings is to ensure that any amendment to PC28 arising from this appeal appropriately recognises and protects the TPS and its operations, accords with the purpose and principles in Part 2 of the RMA and gives effect to the National Policy Statement for Renewable Electricity Generation.

Alternative dispute resolution

11. Genesis agrees to participate in mediation or other alternative dispute resolution of the proceedings.



David Allen / Chelsea Easter
Counsel for Genesis Energy Limited

Date: 24 September 2025

Address for service of person wishing to be a party:

Genesis Energy Limited
c/- **David Allen**
Buddle Findlay
Level 17, Aon Centre
1 Willis Street
PO Box 2694, Wellington 6140

Phone: 04 462 0423
Mobile: 021 955 744
Email: david.allen@buddlefindlay.com

c/- Chelsea Easter

Buddle Findlay
Level 17, Aon Centre
1 Willis Street
PO Box 2694, Wellington 6140
Phone: 04 462 0825
Mobile: 021 925 613
Email: chelsea.easter@buddlefindlay.com