

IN THE ENVIRONMENT COURT OF NEW ZEALAND  
I MUA I TE KŌTI TAIAO O AOTEAROA

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ENV-2024-CHC-39

*IN THE MATTER* of the Resource Management Act  
1991 (“Act”)

*AND*

*IN THE MATTER* of an appeal under clause 14 Schedule  
1 of the Act concerning the **Proposed  
Otago Regional Policy Statement  
2021**

*BETWEEN*

**ENVIRONMENTAL DEFENCE  
SOCIETY INCORPORATED**

Appellant

*AND*

**OTAGO REGIONAL COUNCIL**

Respondent

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**RMA, S 274 NOTICE BY MERIDIAN ENERGY LIMITED**

**DATED 7 JUNE 2024**

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**Instructing counsel:**

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— BARRISTER —

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To The Registrar  
Environment Court  
Christchurch

**Meridian Energy Limited** (Meridian) wishes to be a party to the following proceeding:

- (a) The Environment Court appeal reference ENV-2024-CHC-39 concerning an appeal against Otago Regional Council decisions on the Proposed Otago Regional Policy Statement.

Meridian is —

- (a) A person who made a submission about the subject matter of the proceeding and;
- (b) A person with an interest greater than the public generally. Meridian undertakes renewable electricity generation activities across the country and has a special interest in how the national direction under the NPS-REG is implemented.

Meridian is not a trade competitor for the purposes of [section 308C](#) or [308CA](#) of the Resource Management Act 1991.

Meridian is directly affected by an effect of the subject of the appeal that—

- (a) Adversely affects the environment, and
- (b) Does not relate to trade competition or the effects of trade competition. Meridian is interested in the entire proceeding, but without limiting the foregoing, signals a specific interest in the following particular issues:
  - (i) The extent to which the resolution of the Appellant has identified issues and the relief sought will either promote or frustrate the directions in RMA Part 2, including RMA, ss 7(i) and (j) relevant to renewable energy generation and transmission;
  - (ii) The extent to which the Appellant has identified issues and relief sought will either promote or frustrate the statutory requirement to give effect to NPS-REG;
  - (iii) The extent to which the Appellant has identified issues and the relief sought will either promote or frustrate the appropriate recognition of the importance of the impacts of climate change

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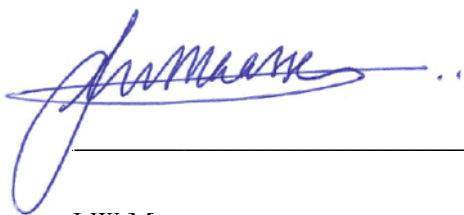
and the need to facilitate renewable energy generation to achieve targets set in the Climate Change Response Act 2002;

- (iv) The extent to which the Appellant has identified issues and the relief sought in the appeal will promote or frustrate the purpose and aims of the Decisions Version of the PORPS that, in combination with the relief sought by Meridian in its appeal, will satisfactorily meet the requirements of RMA, Part 5.

Meridian opposes the relief sought in the appeal because:

- (a) The relief sought by Meridian in its appeal is, in combination with the Decisions Version of the PORPS, necessary to achieve RMA, Part 5 appropriately and notably:
- (i) To prepare an Otago Regional Policy Statement in accordance with Part 2;
- (ii) Give effect to the NPS-REG;
- (iii) Appropriately recognise the effects of climate change and the need to facilitate renewable energy to achieve the targets set in the Climate Change Response Act 2002.
- (b) The Appellant's relief will not appropriately secure the issues Meridian is interested in above and undermines the package of provisions in the Otago Regional Policy Statement Meridian seeks in its appeal.

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



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J W Maassen  
Counsel authorised to sign on behalf of Meridian Energy Limited.

Date 7 June 2024

Address for service of person wishing to be a party:  
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