



18 November 2019

Ref: OIA 1920-0672

Andrew Tipton

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Dear Andrew Tipton

On 22 October 2019, the Ministry of Business, Innovation and Employment (MBIE) received a transfer of your request from the Ministry for the Environment, requesting, under the Official Information Act 1982 (the Act), information relating to the Greenhouse Gas Inventory.

For the sake of clarity, I will be responding to your questions individually.

(1) What is the reason for the inconsistency between the figures provided in MfE's GHG Inventory and MBIE's energy statistics publications?

Liquid fuels

In the case of liquid fuels used for electricity generation, MBIE's oil data series has been revised since the Greenhouse Gas (GHG) Inventory was prepared. MBIE's WebTables reflect this revision and the 63.40 TJ reported is the updated figure.

Gaseous Fuels

The difference between the Inventory value and that reported on MBIE's WebTable is due to difference in allocation. As the request notes, for the GHG Inventory, some gas used for cogeneration is allocated to the relevant manufacturing sectors. MBIE's response to question three provides further detail regarding this.

(2) Did you rely upon any additional (non-disclosed) data sources in arriving at the activity data for category 1.A.1.a of the Inventory? If so, can you please describe these additional data sources? If the data source is not currently available to the public, please provide it as part of your response.

No additional sources were used. All sources of activity data are described in the Activity Data section of New Zealand's Greenhouse Gas Inventory (1990 – 2017) for this category which can be found in section 3.3.6: 'Activity Data, 1.A.1.a Public electricity and heat production', page 88.

(3) How did you determine whether or not a particular co-generation plant's "primary purpose" was to "produce electricity"? For the purposes of reproducing your results, can you please provide a list of the co-generation plants that you evaluated, together with the plant's fuel consumption and the category (such as 1.A.1.a) it was assigned to in the Inventory?

The approach to determine whether a plant is a main activity electricity generator where its "primary purpose" is to produce electricity, or an autoproducer, is presented in section 3.3.6: 'Activity Data, 1.A.1.a Public electricity and heat production,' Figure 3.3.7, page 89 of New Zealand's Greenhouse Gas Inventory (1990 – 2017).

As noted in this section, six cogeneration plants were determined to be main activity electricity generators.

Below is a list of cogeneration plants which have contributed to Greenhouse Gas Inventories and their assessed classifications.

The Ministry is unable to advise on the plants' fuel consumption as the release of this information would be likely to unreasonably prejudice the commercial position of the person who supplied or who is the subject of the information. As such, your request for this information is refused under section 9 (2)(b)(ii) of the Act.

Plant Name	Generation Type
Auckland City Hospital	Main activity
Auckland City Hospital 2	Main activity
Ballance (Mount)	Autoproducer
Ballance (Whangarei)	Autoproducer
Birkenhead	Autoproducer
Blue Mountain Lumber	Autoproducer
Edgecumbe	Main activity
Christchurch Wastewater Treatment	Autoproducer
Civic Building Trigeneration	Autoproducer
Dominion Salt	Autoproducer
Fonterra Edendale	Autoproducer
Fonterra Te Awamutu	Autoproducer
Fonterra Waitoa x 2	Autoproducer
Glen Innes Aquatic Centre	Autoproducer
Glenbrook	Autoproducer
Glenfield Leisure Centre	Autoproducer
Home of Compassion	Autoproducer
Hotel Grand Chancellor	Autoproducer
Howick Baptist Healthcare	Autoproducer
Hyatt Hotel	Autoproducer
Invercargill Waste Water	Autoproducer
Kapuni	Main activity
Kawerau A&B (Wood)	Autoproducer
Kawerau Mill - Back Pressure	Autoproducer
Keith Spry Pool	Autoproducer
Kinleith	Autoproducer

Lagoon Leisure Centre	Autoproducer
Lido Aquatic Centre	Autoproducer
Lloyd Elsmore Park Leisure Centre	Autoproducer
Mangare Wastewater Treatment	Autoproducer
Manuera Aquatic Centre	Autoproducer
Massey Park Aquatic Centre	Autoproducer
Milford Deep, Underwater Observatory	Autoproducer
Otara Leisure Centre	Autoproducer
Pacificare Trust Centre & Hospital	Autoproducer
PanPac Steam Turbine	Autoproducer
Papatoetoe Centennial Pools	Autoproducer
Pukete Sewage Plant	Autoproducer
QE2 Sports Centre Cogeneration - Burwood Landfill	Autoproducer
Ravensdown (Dunedin)	Autoproducer
Ravensdown (Christchurch)	Autoproducer
Ravensdown (Napier/Awatoto)	Autoproducer
Rosedale WWTP (North Shore)	Autoproducer
Roskill Masonic Village	Autoproducer
Scion Gas Cogeneration	Autoproducer
SDA Hospital	Autoproducer
Southdown	Main activity
Southern Cross Hospital	Autoproducer
Stanford Plaza Hotel	Autoproducer
Te Awamutu	Main activity
Te Rapa	Main activity
Todd Energy Aquatic Centre	Autoproducer
Tussock Creek Sawmill	Autoproducer
Upper Hutt Pool	Autoproducer
Waipa Sawmill	Autoproducer
Wellington Regional Aquatic Centre	Autoproducer
West Wave Aquatic Centre	Autoproducer
Western Bay Health	Autoproducer
Whangarei City Council	Autoproducer
Whareroa Cogeneration	Main activity

(4) The CRF tables accompanying the Inventory also state the "implied emission factors" for each fuel type. Please explain which data sources you used, and the methodology that you employed, to arrive at the specific emissions factors that were used in the calculation of category 1.A.1.a in the Inventory. If any of the data that you used is not currently available to the public, please provide that data as part of your response.

Emissions factors used for New Zealand's energy sector and their sources are published in Annex 4 of New Zealand's Greenhouse Gas Inventory (1990 – 2017). The methodology employed for different emission factors is discussed in Annex 4, as well as in section 3.3.1 'Sector-wide information: Emission factors', page 82.

As noted in section 3.3.1, New Zealand's natural gas emission factor fluctuates from year to year, mainly due to the different mixture of gas fields that produce gas in that given year. To calculate emissions from gaseous fuel use in category 1.A.1.a, MBIE collects information from generators on the origins and volumes of natural gas used. The implied emissions factor is therefore aggregated from plant-specific data. The disaggregated plant-specific data is commercially sensitive and the release of this information would be likely unreasonably to prejudice the commercial position of the person who supplied or who is the subject of the information. As such, your request for this information is refused under section 9 (2)(b)(ii) of the Act.

I trust you find the information helpful. You have the right to seek an investigation and review by the Ombudsman of this decision. Information about how to make a complaint is available at www.ombudsman.parliament.nz or freephone 0800 802 602.

Yours sincerely



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