

**BEFORE THE FRESHWATER COMMISSIONERS**

**IN THE MATTER** of an original submission on  
the Proposed Regional  
Policy Statement for Otago  
2021 (**PRPS**)

**BETWEEN** **AURORA ENERGY  
LIMITED**

**Submitter 0315**

**AND** **OTAGO REGIONAL  
COUNCIL**

**Territorial Authority**

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**MEMORANDUM OF COUNSEL ON BEHALF OF AURORA ENERGY  
LIMITED**

**DATED 13 APRIL 2022**

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**MEMORANDUM OF COUNSEL ON BEHALF OF AURORA ENERGY  
LIMITED**

**May it please the Commission:**

1. This memorandum is filed on behalf of Aurora Energy Limited (**Aurora**) who made a submission on the proposed Regional Policy Statement for Otago 2021 (**OS0315**).
2. Counsel has received a memorandum for the various agricultural interests<sup>1</sup> dated 13 April 2022 regarding timetabling matters in advance of hearings on the PRPS 21 (referred to as Agricultural interests for the purpose of this memorandum).
3. Aurora supports the requested timetable for the exchange of evidence for the reasons given in that memorandum. It is worth reiterating that many of the parties involved in this process are familiar to each other, having worked extensively throughout the former PRPS 2019 process, at the Council Hearing and throughout the Environment Court appeals process. In Aurora's case, those parties are the Agricultural interests, the electricity distribution providers (Network Waitaki Limited and Powernet Limited), including other regionally significant infrastructure providers (Dunedin International Airport Limited, Queenstown Airport Corporation, Port Otago Limited and Transpower New Zealand Limited).
4. There is an opportunity now, through the exchange of evidence to enable significant alignment of interested to occur. However, that alignment takes time. It is considered that the additional time enabled by the memorandum for the Agricultural interests provides a sufficient period for the parties to liaise and support as much of a joint approach as is possible given the differing interests which gave rise to the respective submissions. It is hoped that by enabling a greater period for the exchange of evidence that this can streamline the hearing process, to an extent.

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<sup>1</sup> Memorandum on behalf of Horticulture New Zealand, Otago Water Resource Users Group, Beef + Lamb New Zealand Limited, Federated Farmers of New Zealand, and Dairy NZ Limited.

5. Given the above, Aurora supports the requested approach put forward by the Agricultural interests, in terms of the sequence of the hearing and exchange of evidence, which for convenience is replicated below:
- (a) The section 42A Report to be posted on the website by 23 June 2022;
  - (b) All parties evidence in chief by 5pm on 29 July 2022 (5 weeks after section 42A Report);
  - (c) All evidence in chief to be posted on the website by 5 August 2022;
  - (d) All rebuttal evidence by 5pm 26 August 2022 (4 weeks after evidence in chief);
  - (e) All rebuttal evidence to be posted on the website by 2 September 2022;
  - (f) Hearings to commence on 12 September 2022 and are likely to concluded within 5 months (2 weeks after rebuttal evidence).

Dated 13 April 2022

A handwritten signature in blue ink, appearing to be 'Bridget Irving / Simon Peirce', written over a horizontal line.

Bridget Irving / Simon Peirce

Partner / Senior Solicitor

Counsel for Aurora Energy Limited