

**IN THE ENVIRONMENT COURT  
AT WELLINGTON**

**I MUA I TE KŌTI TAIĀU O AOTEAROA  
TE WHANGANUI A TARA ROHE**

**ENV-2019-WLG-000106**

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

**AND**

**IN THE MATTER** of an appeal pursuant to Clause 14(1) of the First  
Schedule to the Act

**BETWEEN** **MINISTER OF CONSERVATION**

**Appellant**

**AND** **GREATER WELLINGTON REGIONAL COUNCIL**

**Respondent**

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**NOTICE OF PERSONS WISHING TO BE PARTY TO PROCEEDINGS  
ON BEHALF OF FIRST GAS LIMITED**

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**Govett Quilliam**  
THE LAWYERS

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**NOTICE OF PERSONS WHO WISH TO BE PARTY TO PROCEEDINGS**  
***Section 274 Resource Management Act 1991***

**TO:** The Registrar  
Environment Court  
WELLINGTON

1. First Gas Limited (“First Gas”) wishes to be a party to the proceedings *Minister of Conservation v Greater Wellington Regional Council* (ENV-2019-WLG-000106). The proceedings concern an appeal against parts of the decisions of the Greater Wellington Regional Council on the Proposed Natural Resources Plan (the “Proposed Plan”).
  
2. First Gas is both:
  - 2.1 a person who made a submission about the subject matter of the proceedings<sup>1</sup>; and
  
  - 2.2 a person who has an interest in the proceedings that is greater than the interest that the general public has, including for the following reasons:
    - 2.2.1 First Gas owns and operates a gas transmission and gas distribution network within the Wellington Region, which is regionally significant infrastructure;
  
    - 2.2.2 the relief sought may have implications on First Gas’ ability to safely, effectively and efficiently operate, maintain, upgrade, replace, remove and develop its regionally significant gas network.

**Trade competition**

3. First Gas is not a trade competitor for the purposes of section 308C of the Resource Management Act 1991.

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<sup>1</sup> First Gas is the successor of Vector Gas Limited. Vector Gas Limited made a submission and further submission on the Proposed Plan.

**Interest in proceedings**

- 4. First Gas is interested in the following matters raised by the Appellant:
  - 4.1 Section 4.10 – Coastal Management: Policy P138 – Structures in sites with significant values;
  - 4.2 Section 5.7 – Coastal Management: Rule R151 – Additions or Alterations to structures – controlled activity.

**Position in respect of relief sought**

- 5. First Gas opposes in principle the relief sought by the Appellant for the following reasons:
  - 5.1 The relief sought will not promote the sustainable management of natural and physical resources.
  - 5.2 The relief sought will not provide an appropriate and sufficiently certain regulatory framework for the safe, effective and efficient operation, maintenance, upgrade, replacement, removal and development of First Gas' regionally significant gas network.

**Mediation / Alternative Dispute Resolution**

- 6. First Gas agree to participate in mediation or other alternative dispute resolution of the proceedings.

**Signature**



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**L P Wallace / R E Eaton**  
Counsel for First Gas Limited

**Date:** 12 December 2019

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