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The Committee Secretariat
Petitions Committee
Parliament Buildings, WELLINGTON.
25 January 2022

Submission on our petition to keep the Marsden Point oil refinery in operation

Introduction

While the Refinery is operated by a private company with commercial shareholders the government is inexorably tied to the company through its ownership of shares (Accident Compensation Corporation 8.38%), requirement to purchase reserve fuel stocks, tax revenue income, and requirement to ensure the country's fuel security (especially essential services).

The Cabinet paper 'Fuel supply resilience without a domestic oil refinery' released on 2nd November 2021 contains numerous important warnings, yet the potential for the outcomes it describes appears to have been lost on Cabinet, whose members seem to think that the ongoing ramifications justify them sitting on their hands and doing nothing. (much of the content of the cabinet paper comes from two reports commissioned by MBIE from Hale and Toomey)

Economic Costs

The ongoing actual and likely economic costs of closure of the Refinery will be born by the government, fuel users, and individuals - which ultimately means all New Zealanders will pay.

1. *"Closure of the Marsden Point refinery will result in increased cost of IEA 90-day stockholding compliance –* ***up to $13 million annually****".* (CP)

2. *"The quantity of reserve stock purchased in 2019/20 was equivalent to around 700 million litres of fuel,* ***at a cost of more than $20 million****. Reserve stock costs are recovered by a levy on all petrol and diesel sold. The levy is currently set at 0.6 cents per litre, of which 0.455 cents is allocated to fund reserve stocks."* (CP)

3. *"Refining NZ stopped producing bitumen in January 2021 mainly due to economic factors as the manufacturing plant required capital investment. New Zealand has since been in a 100% bitumen import model, which has worked well to date to ensure sufficient bitumen supply is available in the country."* (CP)

According to Auckland Mayor Phil Goff, the **cost of bitumen has risen over 40%** since that time. (Interview Magic Talk radio 19th October 2021)

4. *"Food-grade liquid carbon dioxide, used in the food and beverage sector and in some water treatment plant, is currently produced at the refinery and at the Kapuni gas processing plant in Taranaki. There are two national suppliers – BOC and Air Liquide. While there are other potential CO2 sources, including imports,* ***closure of the refinery will challenge the CO2 supply chain*** *– particularly a short lead time to make necessary investments or relocate plant."* (CP)

5. *"The refinery currently produces sulphur and CO_2 as by-products from its process. Sulphur is sold to the fertiliser industry and CO_2 to the carbonated drinks industry. It is likely* ***in both cases costs would rise*** *for those industries in the absence of supply from Refining NZ"* (Hale and Toomey report March 2020).

6. *"Closure of the Marsden Point refinery will result in the loss of about 240 direct jobs and associated economic impact in Northland".* (CP)

The cabinet paper doesn't mention the loss of indirect jobs – contractors, suppliers, and other businesses affected by the loss of income into the Whangarei economy. The economic impact on Northland economy only is anticipated to be roughly an 8 percent drop. A First Union study done about a decade ago said that for about every job at the refinery it creates about eight jobs in that community, so potentially up to 4000.

7. *"Closure of the refinery may close off opportunities to use or re-purpose the refinery to produce biofuels alongside conventional fuels, which might be a low cost pathway to future large-scale biofuels production in New Zealand.".* (CP)

Without it those options become much more difficult and very expensive as the infrastructure, already in existence at Marsden Point, will have to be constructed from scratch. The same goes for fuels from carbon capture, plastic to fuel technology, Sustainable Aviation Fuel.and other options.

8. The costs for remediation of the Refinery site (environmental cleanup) once the refining operation stops is estimated to be in the vicinity of $300 million. No plan has been published for this work, but the costs will undoubtedly be passed on to fuel users through the cost of fuel at the pumps. (Not disclosed to shareholders in the Conversion proposal and shareholder explanatory booklet 5th July 2021).

9. Taxpayers and fuel users have contributed large sums of money to improve and expand the capacity of the refinery since it was first built in 1964. In 1980 the Government effectively gave a guarantee, under which a loan for expansion would be serviced through its petrol pricing policies. In the July 1986 Budget the Government had introduced a package to take over the Think Big debts. This included the re-financing of the loans for the refinery expansion, with their subsequent amortisation and interest repayments being funded from an Excise Duty rather than, as initially, by a direct levy on transport fuels. The Government then repaid the lenders on behalf of the Company. The project to install a 170 kilometre pipeline ($55 million) to Wiri and a hydrocracker was completed in 1986 at a final cost of $1.84 billion.

Subsequently, the Petroleum Sector Reform Act 1988 enabled the Crown to assume the liability for the balance of the Eurodollar Expansion Loans on 9th May 1988.

In 1988 the Refinery assets were transferred by the Labour Government to the New Zealand Refining Company Limited, a consortium of the five major petrol retailers. The Government injected $85 million to enable the company to adapt to the new deregulated environment. The bulk of that $85 million went straight into the pockets of the shareholders as dividends.

The New Zealand public has therefore invested a large sum of money into the refinery. That investment will disappear if the refinery closes as the plan is for the plant to be dismantled and sold for scrap. (Refining NZ shareholders will benefit from estimated tax losses of approximately $300 million to $350 million generated on the decommissioning and write-off of refinery assets – Conversion proposal and shareholder explanatory booklet 5th July 2021).

10. The reason advanced by Refining New Zealand for the closure of the plant and the change to imported refined fuel is that there is insufficient profit for shareholders in the refining operation. A report commissioned by the company in 2020 predicted low margins for several years as a result of Covid -19 but a return to good profitability by 2024. A Grant Samuels report prepared for the shareholder meeting that voted on the closure echoes that - "Refining margins are expected to remain at low levels as a result of excess refining capacity through to 2025 and possibly beyond". Despite this the company's interim report to June 2021 shows it has already returned to profit (albeit small). That report says *"Refining NZ's forecasts for the next twelve months indicate the Group has the ability to continue to operate as a going concern despite the challenges arising from the current low margin environment and COVID-19".* Effectively the removal of New Zealand's capacity to refine its own fuel is being driven purely by the pursuit of shareholder profits. (The oil companies operating in NZ hold just under 50% of the shares.)

11. If the company under its changed name of Channel Infrastructure, is going to produce better returns for shareholders that can be achieved in only two ways, reduced costs or higher prices. Many commentators predict higher prices as a result of the change to imported refined fuel. The price Kiwis pay for fuel has been the subject of many investigations over the years. Here are a few examples:

(a) An investigation by Inland Revenue begun in 1963 found that the oil companies had been setting too high a transfer price for their supplies of oil imported from their overseas parents so as to reduce their tax liabilities in New Zealand. It was also argued that in assessing the transport loading, the companies were overstating their costs by using relatively small tankers as the basis for setting costs.

(b) The Commerce Commission released a Retail Fuel Market Study Report in December 2019 following the more than doubling of petrol and diesel importer margins over the past decade which could not be explained by any significant increase in capital expenditure. It found that an active

wholesale market does not exist in New Zealand, and that is weakening price competition in the retail market. The report contained a number of recommendations aimed at improving competition in the New Zealand retail fuel sector. The Fuel Industry Act 2020 was passed in August as a first step to implementing these changes, most of which are only now coming into force.

(c) Just yesterday (24th January 2022) a Newsroom article reported that MBIE had reported that increased fuel company profit margins were contributing to rising petrol and diesel prices this summer. *"According to provisional data from the Ministry of Business, Innovation and Employment, most of this rise is made up of increased importer margins. If MBIE is to be believed, the fuel companies are just pocketing more profits at the expense of New Zealand motorists".* https://www.newsroom.co.nz/commerce-commission-ready-to-rein-in-record-pump-prices

The price of fuel has a significant effect on the price of everything that consumers purchase or services they use. It is a major cost for the country's transport fleet, agricultural machinery, tradesman workforce, couriers, airlines, etc, and is priced into their charges. It also has a significant effect on the cost of travel for workers commuting to jobs. Consumer NZ chief executive Jon Duffy quoted in that Newsroom article *"This is a social issue. Particularly in a country like ours, where – you can insert the adjective – but we're pretty rat-shit at public transport, right? So it's pretty hard if you need a vehicle to work. Auckland's a prime example where if you live in certain areas, and you've got to get to work by 7am, you need a car. And if it's a low paying job, you've potentially got a cheaper, less fuel efficient car."*

(d) With the move to imported refined fuel, there are few mechanisms to ensure the oil companies don't return to using a transfer price mechanism for their supplies of imported product from their overseas parents, who have interests in the refineries those products will be sourced from, so as to reduce their tax liabilities in New Zealand or to ramp up wholesale and retail margins.

Future Fuel Security

"The need for New Zealand to refine its own transport fuels, ensuring access to a reliable and high-quality supply of affordable fuels was realised in the 1950s. More than 60 years later, and with a wealth of experience and technical know-how under our belts, the need is as strong as ever" – Refining New Zealand 2019 Annual Report.

"Refining NZ has played a significant role in New Zealand's fuel supply chain since the refinery was originally commissioned in 1964. It is one of the safest and most reliable oil refineries in the Asia-Pacific region and continued investment has helped to ensure that the refinery has kept pace with emerging industry standards, with a particular focus on product quality, operating efficiency and carbon emission reduction". Refining New Zealand Conversion proposal and shareholder explanatory booklet 5th July 2021.

Yet the country is now faced with the closure of the refinery. New Zealand will rely totally on the capacity of international shipping supply lines to get imported refined fuel into the country from refineries in Korea and Singapore.

In the event of a natural disaster or a geopolitical conflict (China/Australia/ USA) the shipping routes to New Zealand could be cut off. Tensions continue to increase following the AUKUS deal over nuclear submarine availability for Australia, China's incursion into Philippine territory despite an international court ruling and it's publicly stated intentions over Taiwan.

If the situation in Afghanistan worstens and widens oil wells in the Middle East could well come under attack. On 14 September 2019, state-owned Saudi Aramco oil processing facilities at Abqaiq and Khurais in eastern Saudi Arabia were targeted in a drone attack. Oil production from the world's leading oil exporter was cut by half.

"Asian refiners prefer to process Middle East crude grades as they are generally cheaper than oil from other regions due to relatively higher sulphur levels. Middle East oils also tend to be heavier grades, allowing refiners to further process residue fuel into higher-value products to boost revenue. Despite efforts to diversify purchases beyond the Middle East, South Korea, Singapore and Taiwan still need to import 70-75% of their crude from the Gulf". Reuters 9th January 2020. https://www.reuters.com/article/asia-mideast-oil-factbox-idINKBN1Z71VW

In either, or similar circumstances the supply of fuel for essential services could be severely compromised.
This list of essential services is not exhaustive but includes:-

- Air transport into and out of and around New Zealand including all our air freight exports
- Helicopter rescue services, Fire and Ambulance services
- Coastal shipping, inter-island ferries and shipping to the Pacific Islands
- New Zealand's Army, Navy and Air Force including rescue and disaster relief operations (for example Tonga)
- All fishing boats and short distance and inter-island ferries
- The country's transport fleet that moves goods around New Zealand
- Heavy construction machinery and infrastructure and road building equipment
- Agricultural machinery including forestry, farming and horticultural equipment
- Goods and passenger rail operations

If crude oil is not able to be shipped to New Zealand for whatever reason if the refinery was still in operation it could be modified to use New Zealand's own oil supplies from Taranaki and at the very least keep major essential transport, freight, air and defence operations going.

The Cabinet paper 'Fuel supply resilience without a domestic oil refinery' released on 2nd November 2021 contains several concerning items:

*"**The loss of domestic refining could have more adverse outcomes in an unlikely, but potentially high consequence, event** in which New Zealand becomes completely or significantly cut off from global fuel markets for an extended period. "*

*"**An extended "closed border" event would have a severe impact** whether or not New Zealand has a domestic refinery, **but the impact could potentially be worse without a refinery.***

Having a domestic refinery could potentially enable the refining of at least some fuels from crude oil produced within New Zealand *together with any imported crude oil that is available."*

*"**While officials have not specifically assessed the impact of an extended "closed border" scenario**, they have considered the impact of a less severe scenario in which 50 per cent of product imports from North Asia or Singapore are halted completely for a period of one month."*

*"Fuel security/insurance: **loss of ability to refine domestic crude oil could leave New Zealand more exposed to the severe consequence of depleting all fuel stocks** if unable to import any fuel for a sustained period. **A disruption of this kind is considered unlikely in the next 10-15 years but cannot be discounted."***

The head of the Northern Australia Strategic Policy Centre Dr John Coyne is aghast.

"They're very naive," he said.

"They're buying into a very dated view of globalisation, and they certainly haven't learned the lessons from Covid-19, around secure supply chains and national resilience."

The pandemic disproved assumptions that global supply chains could readily deliver, whether it was vaccines or oil, he said.

"If you listen to the oil companies, they'll tell you that all the risk is under control."

But they could not manage the complexities, when conflicts could escalate very quickly, trade splits were deepening, and one natural disaster might pile on top of another, he said.

"If the oil refinery in New Zealand closes, you are totally reliant on oil companies doing the right things ... a really dangerous proposition."

https://www.rnz.co.nz/news/national/448417/nz-naive-to-shut-down-marsden-point-australian-analyst 4 August 2021

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New Zealand researcher Toby Dalley looked into 15 years of risk assessments done for the government, for his masters degree research last year into New Zealand's oil security.

Toby Dalley said he was baffled at the blinkered way this country has for years been weighing the risks of running out of fuel.

He said it was "staggering" how these reports relied on assumptions the market could weather any crisis.

"When I started my research, I was quite baffled to find ... those assumptions, and that we haven't actually concluded a comprehensive assessment or modelling of our supply chain and its security."

Other Western countries like Australia, had weighed the impacts of actual physical shortages of oil, Dalley said.

But lawmakers here faced a "gap" so that it was not even possible to assess how much Marsden Point's closure would narrow the options.

"We certainly haven't gotten all the information at hand we need to actually make an informed decision."

https://www.rnz.co.nz/news/national/448417/nz-naive-to-shut-down-marsden-point-australian-analyst 4 August 2021

From Toby Dalley's thesis - *Medium-term quantitative model-based energy scenarios are almost universally used to play out possible futures, options, and policy effects, and invariably focus on technical and energy-economic dimensions such as changes in demand and supply, greenhouse gas emissions, and supply costs. Existing oil security reports that guide the New Zealand Government's policymaking on oil security exemplify these limitations. Perhaps more surprising is that there has been very little in-depth research examining the exposure and vulnerability of each element of New Zealand's oil supply chain beyond its borders.*

In contrast, the Australian Government has highlighted geopolitical uncertainty as part of its justification for an ongoing review of its oil supply chain and the appropriateness of its policy settings, given Australia's potential exposure to disruptions. It has determined that it is necessary to keep two refineries operational.

What does the NZ government apparently know about security of supply that the Australian government doesn't?

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Simon Terry of the Sustainability Council says it's not too late for the government to follow Australia, and impose a levy of a cent a litre on fuel to keep the refinery going.

"It's like insurance," Terry said.

"It's hundreds of millions of dollars a day in economic costs if supply lines are cut for an extended period. And that's before what it costs society if food and medical supplies run short.

"So you say OK, in order to guard against that possibility, let's take out some insurance and keep the refinery going so we can at least get 20 percent of the country's fuel needs met."

The trouble was, rosy risk assessments had not factored in the real costs of disruption - or what it was worth paying to avoid that, he said.

https://www.rnz.co.nz/news/national/448417/nz-naive-to-shut-down-marsden-point-australian-analyst 4 August 2021

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Adelaide energy analyst Dr Graeme Bethune said crude can be secured from a wider range of sources.

Even with two refineries secured, Australia is considered an outlier for not having better oil security, he said.

"The Australian government has been sort of playing catch up as the outlook has become more and more dire, with refineries closing," Bethune said.

Coyne said "all of a sudden, national resilience is really important".

Though Australia was taking a different tack to New Zealand, and protecting its last refineries, even so the US military based around Darwin had demonstrated "a vote of no-confidence" in Canberra by building up its own strategic fuel reserves, he said.

https://www.rnz.co.nz/news/national/448417/nz-naive-to-shut-down-marsden-point-australian-analyst 4 August 2021

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If an international event severly reduced the supply of crude oil the Asian refineries are unlikely to say – “oops we're short of oil, but that's ok we'll ensure our smallest and furthest away customer, New Zealand, gets what it needs before our bigger customers”.

We are already experiencing global supply line shortages and shipping companies bypassing New Zealand and some New Zealand ports in preference to discharging at larger ports.

“Exporters at the top of the South Island say they’re struggling to fill international orders due to container ships regularly skipping Nelson’s port. Since the start of the year vessels have often skipped Nelson Port to make it to other, larger ports like Tauranga and Auckland in time”. https://www.1news.co.nz/2021/08/11/south-island-exporters-struggling-as-container-ships-skip-nelson-port/

“Numbers from Sea Intelligence show the full extent of our port congestion and shipping woes. The delays were initially forecast to end after Christmas, but the numbers show things have only deteriorated since then.

Shipping reliability across all ports was running at 70 per cent in August. Which means 70 per cent of ships were turning up to ports on time. But this fell to 8.87 per cent in November, with Auckland at 9.57 per cent and Tauranga operating at 7.5 per cent reliability”. https://www.stuff.co.nz/business/125567726/shipping-schedule-reliability-worst-it-has-ever-been

In the event of a natural disaster or a geopolitical conflict (China/Australia/ USA) that situation could rapidly worsen and the shipping routes to New Zealand could be cut off.

Deliveries to regional ports could be compromised and with the two coastal tankers that already deliver refined product to ports around the country being dispensed with, fuel supply to regional areas would be under threat. Additional trucking capacity would have to be sought and costs of fuel as well as transport emissions would rise.

About 15-20% of the oil refined at Marsden Point already comes from Taranaki. The refinery ideally needs a blend of the majority of the heavier Middle East crude (which the hydrocracker was designed to handle) and the lighter Taranaki condensate. But it could quickly reverse the proportions and run quite happily. It could even run totally on the Taranaki supply but not as efficiently.

None-the-less, fuel for essential services could still be produced, and the coastal tankers would enable two way delivery of unrefined and refined product. It should be noted that not all regional terminals have the capacity to receive imported refined product – so more trucks required to transport fuel should the refinery close.

Without an operational refinery the option of processing our own oil is off the table and we would rely on stocks of fuel in storage.

"There is not a strong economic case to hold onshore reserve stocks beyond the current stock level, but there may be other reasons to consider this, for example the management of international supply chain risks." “However stocks held overseas would not provide any fuel supply resilience if New Zealand were unable to import fuel - only domestic stocks can do that, albeit at higher cost.” - Oil and energy consultants Hale & Twomey.

“New Zealand is a party to the International Energy Agreement (IEA), under which it agrees to maintain oil stocks equivalent to 90 days of import demand [crude oil] net of oil exports. In recent years commercial stocks made up approximately 60 days of net import demand. The Government procures the balance (recently around 30 days) in the form of options on oil stocks (called “oil stock tickets”) held off-shore”. Oil and energy consultants Hale & Twomey The National Emergency Management Agency’s National Fuel Plan of March 2020 confirms that approximately a third of our reserve stocks of crude and refined product are held overseas.

Who is going to release that additional 30 day supply if there are disruptions outlined above. Especially when the countries who hold that ‘notional stock’ are also facing disruption.

The Cabinet paper includes this - *“New Zealand has never experienced an event that prevented fuel imports, and there is no formula describing the likelihood of a future event in which New Zealand’s IEA treaty partners would be unwilling or unable to assist in a fuel import emergency. Also, while the consequence of fully depleting all domestic fuel stocks would be severe (picture empty supermarket shelves), it is difficult to assess those consequences in terms of a financial cost- benefit analysis.”*

“While the likelihood of such an event is low, the economic and social cost could be significant.”

“Australia had seven operating refineries in 2010, of which only two now remain operating – supported by an Australian Government assistance package of up to A$2.3 billion announced in May 2021”.

The Australian government has anticipated the possibility of significant disruption and planned for it by keeping refineries operational. The New Zealand government appears to be prepared to ignore it and has left additional storage capacity to the oil companies and large users.

Moving to new fuel options

While we need to transition away from reliance on fossil fuels, having the refinery in operation will allow blending of bio-fuels, fuels from carbon capture, plastic and other options as they come on stream.

It could also participate in developing production and supply of those new fuels, particularly Sustainable Aviation Fuel. Without it all those option become much more difficult and very expensive as the infrastructure, already in existence at Marsden Point, will have to be constructed from scratch.

"Closure of the refinery may close off opportunities to use or re-purpose the refinery to produce biofuels alongside conventional fuels, which might be a low cost pathway to future large-scale biofuels production in New Zealand.". (Cabinet Paper)

Brian Cox, executive officer of the Bioenergy Association, says the Refinery should be leading the discussion on the future of bio-crude and biodiesel in New Zealand's transition to a zero carbon economy.
https://www.bioenergy.org.nz

MPI - New Zealand wood fibre futures stage one report 1st September 2020
https://www.mpi.govt.nz/dmsdocument/41824-Wood-Fibre-Futures-investment-in-the-use-of-commercial-forest-biomass-to-move-New-Zealand-towards-carbon-zero-Stage-1

"There is a viable pathway to establishing Sustainable Aviation Fuel production and supply in New Zealand, and this would have broad social and economic benefits, as well as enabling emissions reductions by up to 85% compared to traditional jet fuel. However, there is no SAF supply in New Zealand". Air New Zealand report May 2021.
https://www.airnewzealand.co.nz/sustainability-carbon-reduction-management

The refinery already produces extremely high quality jet fuel which is prized by international airlines who endeavour to refuel in New Zealand due to the fact the they get more distance and less engine wear from Marsden Point produced fuel.

There is potential to establish a green energy hub at Marsden Point, with a number of new technologies already in use overseas could leverage off each other and the facilities already available at the refinery. Those technologies could include: A Waste to Energy Plant, Carbon Capture Plant, Plastic to Fuel Plant, and Water Treatment and Desalination Plant. A concept plan is attached.

"Closure of the refinery could result in the loss of skilled workers, which could make it harder to develop a biofuels industry in coming years. However, the materiality of any lost opportunity is questionable given the mobility of highly skilled process engineers and refinery operators." – Cabinet Paper.
That statement is questionable given the time it takes to train skilled operators and the demand for those skills as numerous countries develop that technology, especially when, in the aftermath of Covid-19 the international economy ramps up.

What should New Zealand do

Keep the refinery operational.

There are two possible options.

1. Follow Australia's lead and subsidise the operation of the refinery with a levy on fuel users. This option has been recommended to Government by a number of groups including First Union and the Sustainability Council.

This puts the burden not only on fuel users, but on all consumers. As already noted, the additional cost will be added to transport prices and will be added to costs to operate agricultural machinery, tradesman workforce, couriers, airlines, etc, so is priced into their charges. It also has a significant effect on the cost of travel for workers commuting to jobs. It will fuel price rises and general price inflation.

2. As our petition recommends, the government could declare the Marsden Point Oil Refinery a nationally strategic asset and compulsorily purchase all the shares from the private owners (using money created by the country's central bank) and turn it back into a state owned enterprise. The Reserve Bank has already created around $60 billion in the last 18 months and the $260 - $300 million needed to purchase the refinery shares would be a drop in the bucket.

No taxpayer money would be required, nor would there be any of the negatives outlined in option 1. The Reserve Bank created (digital) money is not borrowed for any other source and would not necessarily need to be repaid.

Reserve Bank Deputy Governor, Christian Hawkesby confirmed the bank is doing this on TVNZ's Seven Sharp programme on April 30th.

"We're creating electronic money to buy government bonds", he said. "Through this process we create money." "Twenty years ago this would have been considered unconventional monetary policy". "Now, with Covid-19, effectively every developed country around the world is undertaking this sort of practice".

This was confirmed by RBNZ chief economist Yuong Ha on August 14th "We create money … which is what central banks do, and have always done, but we then exchange it for assets but those sit on our balance sheet."

The advantages of New Zealand owning the refinery

Fuel supply is essential to the economy. With control of the Refinery the country would gain:

1. Greater fuel security with the option to refine our own oil in a crisis.
2. Reduced costs for New Zealanders with control over pricing and lower transport costs leading to a reduction in prices for goods and services.
3. Reduced costs for exporters in getting products to ports and particularly air freight charges.
4. An infrastructure base for the development of new fuel options

5. More competition at the pumps as new retailers would have an easier entry into the market (with the refinery acting as a wholesaler).
6. Reduced pressure on our overseas exchange as profits would not be transmitted off-shore using up valuable overseas exchange.

We therefore call on the House of Representatives to declare the Marsden Point Oil Refinery a nationally strategic asset and require the Government to purchase the shares from private owners (using money created by the country's central bank) so it continues to operate and provide fuel security for New Zealand.

We look forward to appearing before your Committee in due course.

Chris Leitch
Leader

Attachments:
- Comments made by people who signed the Petition (un audited so inappropriate comments have not been removed).
- Green Energy Hub concept