

**IN THE MATTER**

of the Resource Management Act 1991

**AND**

**IN THE MATTER**

applications for resource consents to take and use  
water in the Upper Waitaki Catchments

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**MEMORANDUM OF COUNSEL ON BEHALF OF  
MACKENZIE WATER RESEARCH LIMITED**

**3 JUNE 2010**

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**MAY IT PLEASE THE COMMISSIONERS:**

**Evidence on behalf of Meridian Energy**

1. In response to Commissioner's 24<sup>th</sup> minute, the Applicants request that they be given the opportunity to exercise a right of reply in relation to the further evidence Meridian Energy produce. It may be appropriate for the Committee to allocate a time frame for this.

**Supplementary statement of Dr Melissa Robson**

2. In response to questions raised by the Committee at the hearing Dr Robson has produced a supplementary statement which provides an explanation, case study and a working example of the "needs plus buffer" table. This supplementary statement is **attached** to this memorandum and includes the Excel spreadsheet.
3. Dr Robson was also asked to give an explanation of the evidentiary basis for the cumulative N and P loading to the Ahuriri Arm of Lake Benmore, which is also set out in her supplementary statement.
4. Dr Robson notes that she was unable to show how individual farm mitigation measures give rise to compliance with the threshold in the Ahuriri Arm of Lake Benmore as she does not have access to the modelling to do so. If this is required it will need to be sought from the individual applicants.

**Dated 3 June 2010**

**C N Whata**

Counsel for Mackenzie Water Research Limited