

To: MBIE

From: Electricity Engineers' Association of NZ

Date: 6 October 2026

Subject: EEA Submission – Discussion document for the electricity distribution businesses

OVERVIEW

The Electricity Engineers' Association of NZ (EEA) is the professional body that represents and supports members from across Aotearoa New Zealand's electricity sector. It has provided a public benefit to its members, the wider sector, and electricity consumers, for over 96 years.

Our purpose is to guide and equip the electricity sector so that it can electrify Aotearoa. With over 70 company members and over 600 individual members, our membership base covers every corner of the electricity supply industry and its workforce.

Our mandate focuses on technical best practice (including safety), workforce capability, and connecting the sector to learn, share, and rise to challenges and opportunities together. The EEA drives standardisation and consistency and leads collaborations across the sector that enhance innovation and best practice.

The EEA will shortly formally change its name to the EIA: the Electricity Industry Association.

Overall Position

The EEA supports the government's objective of a high-performing distribution sector that delivers safe, reliable, resilient, and affordable electricity to consumers.

Achieving standardisation and efficiency across the electricity sector is not a challenge solely for distribution networks and will not be solved by focusing on these entities alone. It requires commitment and compromise from all participants across the electricity sector, including contracting and consulting businesses, technology suppliers, retailers, educators, and regulators.

Standardisation should also be pursued not as an end in itself but only where it helps achieve agreed consumer and other outcomes. Our industry is complex and a one size fits all model would have unintended, and inefficient, consequences. Any standardisation initiative (whether regulatory or not) must preserve the ability for organisations to adapt the model for the realities of their locations and consumers.

EDBs operate materially different networks and the EEA's long history of operationalising standardisation has always acknowledged legitimate reasons for different technical, commercial and operational approaches.

Electricity systems rely on infrastructure designed to operate for many decades. Investment, maintenance, and policy decisions must account for asset lives that often span 40–100 years. For this reason, the EEA also advocates for approaches that prioritise long term outcomes over short term gains, and policy and for regulatory approaches that consider whole of life costs and implications.

The EEA's core business is to facilitate and drive coordination, collaboration, and standardisation across the electricity supply industry. It has a strong track record of delivery, high levels of trust and engagement across the sector, and an administrative and governance structure that enables it to expand and update its work programmes as required by changing industry and regulatory circumstances.

The EEA currently leads significant sector led programmes to enhance collaboration, standardisation and continuous improvement across the sector. These programmes range from DG connection processes, voltage management, technical engineering processes, asset management, condition assessment, safety, to workforce competencies. Our current work includes specific initiatives that respond to recommendations made in the Asset Dynamics report. The EEA advocates for regulation that supports and incentivises participation in industry-led initiatives rather than duplicating them.

The EEA's experience is that standardisation that is designed by industry for industry has higher prospects of success due to being based on lived experience, including the whole of system thinking that comes from cross sector collaboration, and the participation in design, workshopping and feedback loops generating industry buy-in to agreed solutions.

We attached the consultation submission form.

Contact

The EEA's contact person for this submission is Dr Kannan Munisamy, Lead Advisor Engineering & Technical (kannan@eea.co.nz, mobile: 0223276310)



Consultation submission form

The Ministry of Business, Innovation and Employment (MBIE) would like your feedback on:

Options to improve the efficiency of electricity distribution businesses

Please provide your feedback by **5pm, Wednesday, 7 October 2026**

When completing this submission form, please provide comments and supporting explanations for your reasoning where relevant. Your feedback provides valuable information and informs decisions about the proposals.

All submissions will be read by MBIE officials. MBIE may also use AI to summarise content and identify key themes. All AI outputs will be subject to human review. We appreciate your time and effort taken to respond to this consultation.

Instructions

To make a submission you will need to:

1. Fill out your name, email address, phone number and organisation. If you are representing an organisation, please provide a brief description of your organisation and its aims, and ensure you have the authority to represent its views.
2. Fill out your responses to the discussion document questions. Where possible, please provide us with evidence to support your views. Examples can include references to independent research or facts and figures.
3. If your submission has any confidential information:
 - i. Please state this in the email accompanying your submission, and set out clearly which parts you consider should be withheld and the grounds under the Official Information Act 1982 (Official Information Act) that you believe apply. MBIE will take such declarations into account and will consult with submitters when responding to requests under the Official Information Act.
 - ii. Indicate this on the front of your submission (e.g. the first page header may state “In Confidence”). Any confidential information should be clearly marked within the text of your submission (preferably as Microsoft Word comments).
 - iii. Note that submissions are subject to the Official Information Act and may, therefore, be released in part or full. The Privacy Act 1993 also applies.
 - iv. Provide an alternative version of your submission with confidential information removed in both Word and as a PDF, suitable for publication by MBIE.
4. Submit your feedback:
 - i. By email to ElectrifyNZ@mbie.govt.nz
 - ii. By mailing your submission to:



Electrify NZ Policy
Building, Resources and Markets
15 Stout Street
Ministry of Business, Innovation and Employment
PO Box 1473, Wellington 6140
New Zealand

Please direct any questions that you have in relation to the submissions process to
ElectrifyNZ@mbie.govt.nz

Submitter information

MBIE would appreciate if you would provide some information about yourself. If you choose to provide information in the section below, it will be used to help MBIE understand how different sectors view the options for improving the efficiency of electricity distribution businesses. Any information you provide will be stored securely.

Your name, email address, phone number and organisation

Name: Kannan Munisamy

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Phone number: 0223276310

Organisation: Electricity Engineers' Association of New Zealand (EEA)

- ☐ The Privacy Act 1993 applies to submissions. Please tick the box if you do **not** wish your name or other personal information to be included in any information about submissions that MBIE may publish.
- ☐ MBIE may upload submissions and potentially a summary of submissions to its website, www.mbie.govt.nz. If you do **not** want your submission or a summary of your submission to be placed on either of these websites, please tick the box and type an explanation below:

I do not want my submission placed on MBIE's website because... [insert reasoning here]

Please check if your submission contains confidential information

- ☐ I would like my submission (or identifiable parts of my submission) to be kept confidential, I **have stated** my reasons and ground under section 9 of the Official Information Act that I believe apply (for consideration by MBIE), and I have provided an alternative version of my submission with confidential information removed (suitable for publication by MBIE).



Questions for the consultation

Collaboration and standardisation to drive efficiencies of scale

Q1. How could regulatory settings be improved to better support or incentivise standardisation and collaboration, where this improves efficiency and service outcomes?

The EEA believes that regulatory settings should enable (not replace) collaboration.

Regulation can support and enable effective collaboration by:

- setting the common outcomes that the collaboration aims to achieve
- coordinating dependencies and supporting interoperable interfaces where these reduce transaction costs
- identifying and removing regulatory or competition-law barriers to shared procurement, shared services or common technical approaches
- supporting common data definitions and interoperability where these produce demonstrable customer or system benefit
- maintaining and publishing a shared forward regulatory calendar covering significant consultations, decisions and implementation activity across agencies, and improving transparency of the Council of Energy Regulators through publication of meeting agendas, minutes and agreed actions
- sequencing agency decisions that industry initiatives depend on, and
- focusing on outcomes that do not mandate one size fit all model, but allow for differences, regional deliveries and operational realities.

Q2. What barriers are there to standardisation and collaboration between electricity distribution businesses (EDBs?) If so, what Government action (if any) would help address these?

We expect that several other submitters will adequately cover the barriers.

The EEA already leads industry wider collaboration to achieve standardisation and efficiency, but resourcing limits the number of workstreams that can be taken on at once. A small amount of additional funding or resourcing could significantly expand and accelerate industry wide collaboration for the benefit all consumers.

The time required to effectively engage, design and (most importantly) implement, review and improve standardisation should not be over-estimated.

Standardisation is not only for EDBs, but for all electricity sector participants including consultants, and service providers, private entities and new players. Mechanisms that can unlock wider collaboration (beyond EDBs) will help achieve the desired outcomes.

While it is pleasing to see some EDBs leading regionalised collaboration, achieving national level standardisation benefits from being independently led or facilitated - particularly given the breath of players who need to be involved across the electricity system.



Q3. What do you consider to be the likely scale of benefits from encouraging greater standardisation and collaboration between EDBs?

We expect that other submitters will adequately cover this.



Monitoring performance

Q4. Does this chapter accurately describe the current situation?

There is a strong case for performance information that is easier to compare and use. The EEA recognises the Commerce Commission's existing disclosure analysis and productivity work, and any new framework should build on this foundation.

Credible comparisons require common definitions, consistent source data and transparent treatment of uncertainty. Benchmarking should support continuous improvement and consumer understanding, while allowing EDBs to explain material circumstances affecting their performance.

The EEA is well positioned to lead the development of standardised technical methodologies that support implementation while retaining appropriate operational flexibility to accommodate specific regional and operational differences.

Q5. Do you support the options outlined in this chapter? Please give reasons.

No comments

Q6. What do you consider to be the costs, benefits, or unintended consequences of these options?

We expect that other submitters will adequately cover the costs and benefits, but we urge consideration of unintended consequences. Poorly designed indicators could encourage deferral of maintenance, underinvestment in resilience, or the prioritisation of short-term gains over long term outcomes for consumers. Metrics chosen need to account for the differences of geography, densities, assets condition, resilience, growth, consumer DG uptake and other specific local factors.

Q7. Are there any other options or approaches that could achieve the objective(s) outlined in this chapter? Please describe them and explain why they may be preferable.

No comments



Responsive regulation under Part 4

Q8. Does this chapter accurately describe the current situation?

No comments

Q9. Do you support the options outlined in this chapter? Please give reasons.

No comments

Q10. What do you consider to be the costs, benefits, or unintended consequences of these options?

No comments

Q11. Are there any other options or approaches that could achieve the objective(s) outlined in this chapter? Please describe them and explain why they may be preferable.

No comments



Governance

Q12. Does this chapter accurately describe the current situation?

No comments

Q13. Do you support the options outlined in this chapter? Please give reasons.

No comments

Q14. If you support the options in this paper, do you agree that they should apply to consumer-owned EDBs only? If so, should this include both wholly and partially consumer-owned EDBs? Please give reasons.

No comments

Q15. What do you consider to be the costs, benefits, or unintended consequences of these options?

No comments

Q16. Are there any other options or approaches that could achieve the objective(s) outlined in this chapter? Please describe them and explain why they may be preferable.

No comments



Technical Amendments

Q17. Do you support the options outlined in this chapter? Please give reasons.

EEA supports the objective of clear and workable legislation and regulation. We make no recommendation on individual technical amendments in this response.

Q18. What do you consider to be the costs, benefits, or unintended consequences of these options?

No comments