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**Sent:** Friday, 6 June 2025 4:00 pm  
**To:** Infrastructure Regulation <[infrastructure.regulation@comcom.govt.nz](mailto:infrastructure.regulation@comcom.govt.nz)>  
**Cc:** jharbord <[REDACTED]>; Ben Woodham <[REDACTED]>  
**Subject:** Feedback on EDB Draft INTSA Guidance

Attn: Electricity Distribution Manager  
Subject: Feedback on EDB Draft INTSA Guidance

Thank you for the opportunity to provide feedback on the draft EDB innovation and non-traditional solutions allowance guidance.

As raised in submissions and discussions with Commission staff, MEUG has been pushing for greater focus on the more efficient use of distribution infrastructure and non-traditional solutions. To date, there has been limited use of non-traditional solutions by EDBs, with a preference for traditional "poles and wires" solutions. Therefore, we welcomed the introduction of the new INTSA allowance as part of the DPP4 reset and recommended that the process for INTSA applications be streamlined and does not disincentivise use of these options over Business as Usual (BAU) approaches.

We welcome the development of this guidance. We have the following high level comments:

- The provision of a template should help streamline the process.
- We support the Commission having some flexibility to adjust the INTSA allowance as the project progresses, and greater insight is available around costing (as set out para 51). This "learn and adapt" approach is positive.
- We welcome the publication of a project report after an EDB has completed a project. We encourage these to be shared with all EDBs, to encourage these type of solutions to be adopted across EDBs.
- We also support the suggestion that EDBs voluntarily provide information on how a project could be replicable in other networks across NZ (page 6).

Kind regards,



**Major Electricity  
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