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Commerce Commission NZ | Te Komihana Tauhokohoko

By email to infrastructure.regulation@comcom.govt.nz

Tēnā koe, Claire



SUBMISSION ON DRAFT DECISIONS ON ELECTRICITY DISTRIBUTION BUSINESSES INFORMATION DISCLOSURE AMENDMENTS

Unison Networks Limited (**Unison**) is an electricity distribution business operating in Hawke's Bay, Taupō, and Rotorua. Centralines Limited (**Centralines**) operates in Central Hawke's Bay. As consumer-owned organisations, our focus is on delivering safe, reliable, and affordable electricity to our communities.

Introduction

Unison and Centralines welcome the opportunity to provide feedback on the Commission's Draft Decision on the Electricity Distribution Information Disclosure (ID) Amendment 2025. We support fit-for-purpose regulation that balances robust transparency with efficiency, ensuring that the intent of the regulation is met without imposing unnecessary costs on EDBs. We particularly appreciate the Commission's receptiveness to feedback from the sector, as regulatory decisions that consider practical operational perspectives help to maintain regulatory effectiveness. Lower regulatory costs are also passed through to consumers, supporting more affordable electricity bills while maintaining high-quality disclosures.

Issue 1: De-minimus limit increase

We thank the Commission for responding to the EDB sector's request to increase the de-minimus limit from \$20 million to \$30 million. We consider \$30 million an appropriate increase, reflecting the high observed inflation in the sector over the past five years. We expect this threshold will likely need updating again in 5–10 years. We therefore recommend that the Commission consider that clause 2.3.9(1) include a real \$ threshold adjusted by CPI for subsequent years, to calculate a nominal threshold applicable to the relevant disclosure year. This change maintains the intent of the regulation while keeping regulatory costs proportionate and manageable for smaller EDBs.

Issue 2: Scope of Directors' certification

We support extending the scope of Directors' certification to include:

- Map of anticipated network expenditure and network constraints (clauses 2.3.13–16)
- Information on capital expenditure projects (clause 2.3.17)

- Information on physical service life potential (clause 2.3.18)

We agree that this broader scope will enhance the accuracy and completeness of disclosures and better align Directors' certification with the overall scope of the ID Determination. This change will provide greater assurance to stakeholders regarding the quality and reliability of disclosed information.

We note that clauses 2.3.17–2.3.18 are not related to related-party disclosures. As such, the rationale for the proposed amendment appears inaccurate. Extending the scope to include clauses 2.3.8–2.3.18 does not align with the stated objective of ensuring that all relevant related-party disclosure obligations are captured.

Issue 3: Removal of unnecessary cells and columns

We agree with the Commission's proposal to remove cells and columns that will no longer be required for FY26 IDs. This rationalisation will simplify reporting and reduce unnecessary administrative burden. We note that this also includes the amendment to section 4(iv), which was not specifically mentioned in the Draft Decision but is included in the proposed Schedules, and we support its inclusion.

Conclusion

Unison and Centralines support the proposed changes to the ID requirements as they:

- Promote lower regulatory costs for smaller EDBs while maintaining the intent of the regulation (Issue 1)
- Improve accuracy and completeness by expanding the scope of Directors' certification (Issue 2)
- Reduce confusion and administrative burden by removing unnecessary fields from ID schedules (Issue 3)

Overall, we consider these amendments to be a positive step towards maintaining fit-for-purpose, efficient, and effective regulation that benefits both EDBs and consumers.

Nā māua noa, nā

Tarryn Butcher / Tomas Kocar

REGULATORY MANAGER / PRINCIPAL REGULATORY ADVISOR

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