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Dear Simon

Feedback on the open letter on local lines networks

Buller Electricity Limited (BEL) provides this initial response to the Commission's open letter of 10 September 2026, "Local lines networks: achieving better outcomes for consumers now and in the future". We acknowledge that submissions close at 5pm on 6 November 2026. Our answers follow the Commission's questions and should be read alongside the position we are developing for the Ministry of Business, Innovation and Employment (MBIE) consultation on electricity distribution business (EDB) efficiency.

BEL supports better performance, clear accountability and improvements that benefit consumers. However, comparisons between small regional EDBs and larger networks must take account of their different circumstances. A small customer base or higher cost per connection does not, by itself, demonstrate that an EDB lacks the capacity or capability to operate efficiently. The Commission should assess performance and cost management, knowing these can be influenced separately from unavoidable costs arising from network geography, remoteness and low or declining demand

Too much regulation can increase costs for consumers and leave small teams with less time to improve the business. Before introducing stronger measures, the Commission should show that there is a significant problem, understand its causes and demonstrate that the benefits of the proposed change will outweigh its costs.

Question 1

Is the proposed future state focus of EDBs delivering core network operations well, having strong commercial arrangements in place and building capability for the future appropriate?

Yes. BEL supports all three areas. Every distribution business needs reliable network operations, sound commercial arrangements and the skills and systems to meet future needs.

The vision should also recognise affordability and the different circumstances of each network. Good performance means providing the services consumers need, managing risks and investing at the right time and cost. A small EDB should not need the same systems, staffing structure or spending levels as a larger business to demonstrate that it performs well.

BEL has significant spare network capacity and limited demand growth. Our immediate priorities may therefore be better asset information, maintenance planning and resilience, rather than extra capacity or advanced systems to coordinate electricity demand. We support the Commission's recognition that distribution system operation (DSO) capability, which includes more active management of electricity flows, should suit each network's circumstances. The same approach should apply across the wider framework.

The 2025 disclosure data record a maximum coincidence system demand of 10 MW and 52 GWh supplied to customers, compared with a recorded peak of 11 MW in 2023 and 2024. This illustrates that BEL is managing a small network with spare capacity and no material growth in peak demand, rather than a network facing immediate capacity pressure.

Question 2

Are there aspects which you consider are not adequately addressed within the Vision statement which are either impacting performance now, or are likely to in the future?

The vision needs to make a clearer distinction between unavoidable regional costs and costs that could reasonably be reduced. A remote network still needs to maintain essential assets and obtain specialist support, even with a small customer base. Long travel distances, widely spread customers, natural hazards and limited access to contractors all affect costs. Setting a lower cost-per-connection target does not remove these costs.

BEL's 2026 information disclosure records 644 circuit kilometres of network, 4,998 connection points and 52 GWh supplied. The network extends from Meybille Bay, just north of Punakaiki, to Karamea. These figures illustrate the fixed network that must be inspected, maintained and kept available for a relatively small number of connections across a remote area. A fall in demand does not remove most of those obligations, and the costs cannot be spread across a large or growing customer base.

Declining demand also needs to be recognised. When a major business closes, less electricity may flow through the network, but most maintenance, inspection and resilience work is still required. The reported cost per unit of electricity can therefore rise even when the business is being managed well. How much a network is used is only one part of assessing its performance.

Transmission costs provide a further example of costs that local management cannot control. Following Transpower's 2023 reclassification of Buller region assets from interconnection to connection assets under the new Transmission Pricing Methodology, BEL faced a 427% increase in transmission charges. The annual charge rose from about $445,000 to approximately $2.3 million from 2024. BEL then faced a further increase of about $600,000 in 2025 and about $307,000 in 2026. These increases occurred while local electricity demand remained broadly flat over the longer term and some major industrial loads contracted or closed. BEL absorbed the 2026 increase and intends to hold distribution charges in 2027/28 as well, placing the resulting pressure on the business rather than adding to consumers' bills. This experience shows why changes in costs per connection or per unit of energy need to be assessed alongside transmission charges, demand trends and local business conditions.

The suggestion that shareholders should bear the costs of small scale needs more careful consideration. BEL agrees that unnecessary costs should be reduced, but a small customer base does not automatically mean a business is inefficient. In a consumer trust-owned business, the local community also benefits from shareholder returns. Requiring the shareholder to absorb unavoidable network costs could reduce the funds available for those community benefits. Consumers may therefore pay less through their electricity bills but receive less through their Trust. The Commission should consider both effects.

Local ownership also gives consumers a voice in the Company's direction and allows community priorities to inform decisions. The wider value of this arrangement includes local scholarships and sponsorships, support for education and training, and the ability for the Trust and community to influence the outcomes sought from BEL. These benefits should be considered alongside network costs and service measures when ownership or operating structures are assessed.

The vision should also recognise the combined workload created by regulatory changes and the value of local accountability. Buller Electric Power Trust is actively involved in setting BEL's direction and strategy, and the Board takes guidance from the Trust. Ownership and governance should be assessed on how well they serve consumers, rather than on business size alone.

Question 3

What are the industry's priorities, based on the needs of current and future consumers, and are we aligned?

BEL broadly agrees with the Commission's objectives, but investment priorities and spending levels must reflect local needs. Our priorities are safe and reliable supply, affordability, sensible asset replacement and resilience. New skills and systems should support these priorities and be based on realistic demand forecasts. A national focus on electrification should not take resources away from essential work on networks with limited or declining revenue.

Question 3.1

Where are the biggest areas of focus where a material difference can be made for consumers and the potential hierarchy (priority) of these?

BEL suggests the following order of priorities, while recognising that urgent safety or resilience issues may need to take precedence:

- First, maintain safe and reliable supply through accurate information about asset conditions, maintenance focused on the greatest risks, timely asset replacement and effective outage response.
- Second, improve affordability through careful spending, joint purchasing where it offers savings, efficient support services and less duplicated regulatory work.
- BEL supports collaboration beyond joint purchasing where it can produce demonstrable savings or improve capability. This may include shared specialist services, engineering support, cyber security, training, common systems, joint procurement and other functions that EDBs can deliver more efficiently together. Arrangements should be assessed on their full costs, service quality and benefits to consumers.
- Third, improve customers' experience through clear connection processes, accurate billing information and understandable pricing, that encourages efficient use of the network.
- Fourth, strengthen resilience and prepare for future needs where local risks and demand forecasts justify the investment. This may include shared specialist services and better monitoring of the network.
- BEL's wider group activities also contribute to local and consumer outcomes. Electro Services Limited (ESL), a wholly owned subsidiary, provides electrical contracting services to domestic, commercial and industrial customers and undertakes much of the electrical work associated with meter connections and disconnections. This gives consumers access to local expertise and allows BEL network staff to focus on operating and maintaining the distribution network. BEL's investments in retail and renewable generation, including its interest in Pioneer Energy Renewables and its ownership interest in Pulse Energy, provide income sources beyond distribution charges. When returns are earned, they support the wider group and help contain the amount BEL needs to recover through its distribution charges. Pulse Energy also supports local facilities and events, while BEL's scholarship and sponsorship programmes contribute directly to education and community activity in the region.

Question 3.2

How should priorities be valued/evaluated, and what level of assessment or quantification may be good enough for proposed regulatory interventions?

Each proposed regulatory change should clearly explain the problem, who is affected and what it is intended to achieve. The Commission should compare it with keeping current arrangements, improving existing processes and using less restrictive alternatives. The assessment should include setup and ongoing costs, staff time, checking and auditing requirements, systems integration and any other work that would need to be delayed.

Benefits should be considered over the expected life of the change. These may include fewer outages, better resilience, lower future spending and improved customer service. Expected savings should use realistic assumptions about demand and how widely a new service or system will be used. The assessment should show who pays and who benefits. A proposal that benefits the sector overall may still leave consumers in a small region worse off.

The level of analysis should match the size and risk of the change. A small reporting improvement may need only a short assessment using existing information. Mandatory systems, financial penalties or limits on which asset costs can be recovered from consumers need a stronger business case, testing of different assumptions and trials with a range of EDBs. Where safety or resilience benefits cannot be given a reliable dollar value, the risk assessment should explain the judgement. Possible savings should not be treated as certain.

Question 4

How are EDBs internally determining the capabilities required to deliver most effectively and efficiently for their consumers and setting the path towards a future state? What is this compared against? Is there a specific set of Board level metrics which are tracked or specific information which would be useful to require for disclosure to the Commission to better allow comparison?

BEL is developing its future skills and systems through asset management planning, financial forecasts, risk management and business improvement projects. Current priorities include the next Asset Management Plan, better network and billing information, improvements to business systems and pricing development. These will help us make better decisions and reduce errors.

The skills and systems required should reflect asset conditions, network risks, expected demand, service obligations and the cost of existing processes. Options should include doing the work internally, using external specialists or sharing services with other EDBs. Comparisons with similar regional networks can help identify improvements without assuming that BEL needs the same structure as a large EDB.

BEL supports a small, useful set of measures for Board oversight and comparison between networks, covering:

- Reliability and outage restoration, with consistent explanations of planned outages and major events.
- Maintenance and asset replacement against plan, including overdue critical work and reasons for delays.
- Operating costs and investment against budget, with explanations of significant differences and unavoidable local costs.
- Customer service, connection timeframes, complaints and billing accuracy.
- Staff skills, safety, cyber security, readiness to continue operating through disruptions, and progress on agreed improvements.

These are measures suggested, rather than a claim that BEL already reports all of them in this form. The Commission should first review the information already provided in disclosures and Board reports. Fair comparisons need consistent definitions, similar networks and trends over time, with explanations of important differences.

BEL already reports financial and operational performance to its Board and shareholder through regular Board reporting, annual financial and performance statements, and the Company's published information disclosures. The disclosed material includes expenditure, network assets and reliability. BEL also compares its line charges with those of other EDBs and compares and aligns network design standards where appropriate. We agree that comparisons of asset management assumptions would be useful: for key asset classes, EDBs could compare expected useful lives, inspection and maintenance cycles, renewal triggers and the evidence supporting those assumptions. These assumptions materially affect maintenance and replacement expenditure over time. Any comparison should account for differences in asset conditions, environment and service requirements.

Question 5

What is needed from regulators/regulation/legislation to enable achievement of the vision and outcomes?

BEL needs clear, stable requirements that are coordinated across agencies and suited to each network's size and risks. Management should have room to choose the most effective way to achieve the required outcomes. Different approaches should be accepted where an EDB can show that they provide appropriate assurance and value for consumers.

The Commission should clearly identify which proposals apply to EDBs subject to price and quality controls and which apply more widely. It should also distinguish changes to reporting and public performance comparisons from changes to permitted expenditure or the asset values used to set regulated revenue. This would help each business understand how it would be affected.

Additional regulation affects day-to-day work as well as costs. In a small EDB, the same management team may prepare regulatory returns, oversee systems changes, support purchasing and manage improvement projects. New requirements can delay this work or create a need for more staff and consultants. If the benefits do not outweigh these costs, consumers face a higher burden without a better service.

The cumulative effect of regulation should be assessed when new requirements are proposed. BEL's small management team must respond to requirements from the Commission, MBIE and the Electricity Authority while also operating the network and delivering planned improvements. Each requirement may appear manageable in isolation, but together they can consume substantial staff time, require additional consultants or systems, and delay work that would otherwise benefit consumers. The Commission should assess the combined cost and resourcing impact of existing and proposed obligations, not only the incremental cost of each new rule. It should also distinguish costs such as Transpower charges, which are outside EDB's control, from expenditure management can influence.

Question 5.1

What other enablers are important or essential within our, or other, regulatory regimes?

Common data definitions, reusable templates and systems that can exchange information would make it easier to share services and reduce costs for EDBs, retailers, contractors and connecting customers. The priority should be standardising the information exchanged and the service required. Businesses should be able to retain suitable systems where replacing them would offer little benefit.

Smaller EDBs would benefit from access to shared engineering, cyber security, purchasing expertise and specialist training. Regulatory arrangements should recognise the reasonable costs of setting up and moving to these services where the expected benefits justify the expense. Responsibilities and service standards must remain clear.

The Commission, Electricity Authority and MBIE should coordinate their consultations, reporting requirements and implementation dates. They should use compatible assumptions and allow a realistic sequence for changes. Support for innovation should also be accessible to smaller networks through straightforward applications and shared trials. It should cover improvements to maintenance, resilience and customer service as well as technology needed for growth.

Question 5.2

What should we deprioritise/reduce regulatory burden on?

The Commission should prioritise removing or simplifying:

- Requests for information already available in disclosures, asset management plans or reports to other agencies, unless there is a clear reason to ask again.
- New reporting measures that have no clear purpose or cannot be compared fairly across networks.
- Certification and assurance requirements where other evidence could provide sufficient confidence at a lower cost.
- Requirements for every network to adopt advanced systems for managing demand or electricity flows when local conditions do not justify them.
- Short or overlapping deadlines that increase reliance on consultants and disrupt planned work.

BEL supports necessary safety, reliability and accountability requirements. Our concern is extra process that takes time and money without improving these outcomes. Whenever a new obligation is proposed, the Commission should consider which existing requirements can be removed, combined or simplified.

Question 6

What timescales are feasible?

The time needed should depend on the size and complexity of the change and the resources available. BEL suggests using the first six months after the programme is agreed to settle priorities, definitions and the information already available. Trials of comparisons between similar networks, simpler reporting and selected shared services could follow over the next six to twelve months.

Major systems replacement, integration or staffing changes may take eighteen to thirty-six months once requirements are clear. Timing will depend on purchasing processes, existing contracts and risks to operations. These are indicative planning periods, not commitments by BEL. Urgent safety or cyber security issues should be addressed according to their risk without waiting for the wider programme.

Financial penalties or measures that could damage EDB’s reputation should only follow clear criteria, tested performance measures and a reasonable opportunity to improve. They should not apply retrospectively to sensible decisions made under earlier expectations. The timetable must allow changes to be made safely and at a reasonable cost.

Question 6.1

For EDBs, do you have a clear work programme which identifies when certain capabilities or insights will be more readily accessible?

BEL has several relevant workstreams under way. The 2027–2037 Asset Management Plan (AMP) is targeted for completion early next year. An interim Board review is planned for November to consider asset values, the ten-year forecast and their alignment with the AMP. This work will help connect network needs and investment priorities with financial planning.

Other work includes the ARC network information and billing project, integration of geographic information systems (GIS), Business Central improvements and pricing development for April 2027, including assignment to time-of-use tariffs. These projects aim to improve information, reduce manual work and support better operational and commercial decisions.

These projects are at different stages and do not mean that every required capability is already in place. Delivery dates and dependencies should be brought together as the Commission's expectations become clearer. BEL supports a summary of milestones drawn from existing project and Board reports, rather than a separate regulatory reporting system for these projects.

Question 7

For smaller EDBs, where cost is identified as the key reason for not progressing system or capability development - how is the impact of this assessed and quantified?

The cost of a proposed system or capability should be weighed against what it will achieve and the alternatives available. A cheaper option that meets the network's needs may be the best choice. However, if an essential capability cannot be funded, the business must explain how it will manage the risk rather than keep postponing it.

BEL supports comparing the full costs of doing the work internally, outsourcing, sharing services or introducing changes in stages. This should cover the life of the arrangement, including licences, integration, data cleanup, training, support and staff time. Expected benefits should be measurable where possible, such as fewer errors, less manual work, lower outage risk or reduced future spending. Assumptions should reflect local demand.

For example, a network with spare capacity and no significant forecast constraints may gain little immediate benefit from an advanced system for managing flexible electricity demand. Better asset condition information or linked billing systems may provide more value. If a project is deferred, the assessment should record the benefits being delayed, the risks that remain and what would prompt another review, such as a large new connection or an emerging capacity constraint.

The amount of analysis should match the decision. A modest purchase may need only a short business case, while major spending or significant risks require more detail. A small EDB should not have to pay for expensive study simply to show that a system offering little benefit is not worth buying.

Question 8

What are the barriers to increased consolidation and standardisation within the Part 4 regime? What is needed to overcome or reduce these barriers?

BEL supports collaboration, shared services and standardisation where they deliver demonstrable benefits to consumers. The Commission should identify where the Part 4 regime may discourage these arrangements and consider how those barriers could be reduced.

One potential barrier is uncertainty about how shared-service costs and the initial costs of combining or standardising activities would be treated. EDBs need confidence that reasonable implementation costs will be recognised when assessing efficiency, particularly where savings take several years to emerge. Clear guidance on cost allocation, supported by practical examples, would help businesses assess opportunities and avoid unnecessary compliance work.

Different regulatory settings may also complicate arrangements between EDBs. The Commission should clarify how costs, benefits and regulatory obligations would be assessed where participating businesses are subject to different requirements. Each business needs to understand its responsibilities and how a shared arrangement would affect its regulatory position.

There are also practical barriers that are not necessarily caused by Part 4. These include incompatible systems, different asset standards, existing contracts, data migration and limited staff capacity to manage change. For smaller EDBs, the initial cost and management time can be significant relative to the expected savings. Common data standards, systems that can exchange information and a staged approach to implementation would help. Wherever practical, standardisation should align with normal replacement cycles to avoid discarding systems or equipment that still perform well.

Standardisation should also allow for differences in network conditions. Common approaches to purchasing, reporting, training, cyber security and specialist services may offer benefits, while maintenance practices and operational resources need to reflect local geography, asset condition and service requirements. For a remote network such as BEL's, sharing support functions does not remove the need for local crews and timely outage response.

The Commission could help by providing clear guidance, engaging with EDBs on specific proposals and ensuring that reporting and assurance requirements are proportionate to the arrangements being considered. Businesses should be able to compare the full costs and benefits of joint purchasing, shared specialists, common systems and other forms of consolidation without unnecessary regulatory uncertainty.

For BEL, a significant barrier to consolidation is the physical cost of serving Buller. The 644 circuit kilometre network crosses remote, mountainous terrain from Meybille Bay to Karamea, and some lines can only be accessed by helicopter. This increases the cost and time required for inspection, maintenance and repairs. Combining ownership would not change the location of these assets or remove the need for locally based crews. Any projected overhead savings therefore need to be assessed against transition, travel, mobilisation and coordination costs. Scale alone cannot be assumed to lower total costs or improve reliability for Buller consumers.

The Commission's enforcement history also shows that scale alone does not guarantee sound asset management or reliable service. An EDB that serves more than half a million customers, was penalised for quality-standard breaches involving excessive outages in 2015–16 and again for breaches from 2017–20. Another significantly sized EDB was also penalised for quality breaches associated with excessive outages; the Commission identified historic underinvestment in maintenance and asset renewal as contributing to the deterioration in service quality. These cases do not establish that size caused the breaches, but they demonstrate why the expected benefits of consolidation need to be evidenced rather than assumed.

BEL supports joint purchasing, shared specialist services and common standards where they produce identifiable benefits for consumers. These arrangements can capture efficiencies in functions that can be shared without amalgamating ownership. BEL's position is to retain local ownership and accountability, which keep decisions close to Buller consumers and local network conditions. BEL does not support amalgamation as a default solution for Buller. Before treating amalgamation as an efficiency measure, the Commission should require evidence of net long-term benefits for Buller consumers, including full transaction and transition costs, the need to retain local crews, helicopter access, outage response and service quality.

Question 9

Are there particular proposed potential regime changes where you consider alternative approaches may be more impactful and easily implemented by both EDBs and the Commission?

Yes. BEL suggests the following alternatives to the possible changes outlined in the letter.

9.1 Back-office costs per connection

Use cost per connection, or installation control point (ICP), to identify areas for further review, rather than as a final judgement on efficiency. Compare similar networks and provide explanations of minimum staffing, systems and compliance costs. Allocate costs consistently where staff perform several roles. A single national limit could wrongly treat unavoidable fixed costs as inefficiency or encourage businesses to move costs between categories without making real savings.

For example, 2025 disclosure figures indicate operating expenditure of about $880 per ICP for BEL, compared with about $690 per ICP for Centralines. This difference is a prompt for further analysis, not by itself evidence that BEL is inefficient. The figures need to be examined alongside network geography, asset conditions, service obligations, demand, cost allocation and the scale of unavoidable fixed costs. A benchmark should identify questions to investigate and allow an EDB to explain to the drivers before any conclusion or consequence follows.

9.2 Asset management assurance

Assess the quality of asset management and accept evidence suited to the business' size and risks. Approaches aligned with International Organization for Standardization (ISO) standards may be helpful, but formal certification should not be the only way to demonstrate sound practice or have efficient expenditure recognised. The focus should be on asset information, risk-based decisions and the work delivered before adding further certification costs.

9.3 Standard specifications and procurement at scale

Assess purchasing decisions on value over an asset's life, suitability, supplier availability and delivery risk. Encourage joint purchasing where it saves money, but do not automatically limit the asset costs recognised for regulatory purposes because another purchasing route was used. Urgent replacements or specific local resilience needs may justify a different approach. Allow documented exceptions where the business can show good value.

9.4 Utilisation and flexibility incentives

Assess network use alongside demand trends, spare capacity needed for reliability and other service requirements. An EDB should not be penalised simply because a major customer closes or expected demand does not arrive. Consider flexible demand or generation options according to the investment they could realistically avoid or delay locally. Where relevant, asset costs should only be excluded from regulatory

recognition if there is evidence that the EDB unreasonably rejected a practical, cheaper alternative. Clear criteria and an opportunity to respond are essential.

9.5 Streamlined expenditure assessment

Efficient pricing should be considered alongside the engineering need and other options. Essential asset replacement or resilience work should not be delayed solely because pricing changes are still being introduced. A simpler expenditure approval process should depend on the strength of the overall business case and the type of work proposed.

9.6 Consumer compensation

Before introducing compensation for losses resulting from a service failure, define what failure qualifies, what precautions were reasonably expected, how the failure caused the loss and how claims would be reviewed. A cyber incident alone does not prove that reasonable protection was missing. Any proposal should take account of existing obligations and insurance and avoid duplicate requirements or spending mainly to protect against claims where it does little to reduce actual risk.

9.7 Innovation and transformation support

Provide straightforward applications and shared trials that smaller EDBs can access. Support should include better asset information, maintenance and resilience, as well as advanced systems for managing electricity flows. Projects should show credible benefits and share their findings so other networks can use successful approaches without repeating the development costs.

9.8 Aggregation expenditure

Adding merger or consolidation transaction costs to the regulatory asset base allows those costs to be recovered from consumers over time. It does not, by itself, make the arrangement efficient or remove the cost. Such treatment should require evidence that the overall benefits to consumers outweigh the costs. Comparable support should be considered for effective shared services. How a proposal is funded should follow a sound business case, rather than replace the need for one.

Question 10

On the Commission's process from here – how do you think our work programme could be best developed in coordination with the sector?

The Commission should first establish what problems need to be addressed, using existing disclosures and the feedback received by 22 October. It should distinguish poor performance from differences caused by geography, widely spread customers, demand and regulatory settings. Whether stronger intervention is needed should depend on that evidence.

Before treating an EDB as an outlier or selecting an intervention, the Commission should establish what the evidence shows and identifies the factors driving the result. The EDB concerned should be able to check the underlying data, correct factual errors and explain material differences before a finding of poor performance or inefficiency is made, particularly where a public ranking, financial penalty or other consequence may follow.

Measures and incentives should also be tested for unintended effects. A cost benchmark should not reward an EDB for deferring necessary maintenance, asset renewal or resilience work simply to improve its position against a short-term metric. The Commission should test whether proposed measures preserve long-term reliability and consumer outcomes and should adjust or remove measures that create incentives to postpone prudent work.

BEL recommends the following steps:

- Form a representative sector group that includes small regional and consumer trust-owned EDBs, larger EDBs and consumer representatives. Small networks should help design the approach from the outset.
- Agree with the desired consumer outcomes, definitions and priority problems before choosing incentives or penalties. Publish the evidence and assumptions behind each priority, including any limitations.
- Coordinate the programme with MBIE and Electricity Authority work and publish a shared timetable. Reuse relevant submissions and data, while allowing businesses to explain where the issues or scope differ.
- Trial comparisons across a range of networks. Check that the measures distinguish poor performance from unavoidable local costs and that the reporting effort is reasonable.
- Consult on the detailed proposals, who they apply to, expected benefits and costs, and transition arrangements. Give EDBs an opportunity to correct factual errors and explain significant differences before publishing unfavourable comparisons.
- Review whether the changes have delivered the intended benefits for consumers. Amend or remove measures that add costs without sufficient benefit.

The Commission should explain how feedback has influenced the programme and why it has not accepted suggestions. Requests for additional information should be focused on and allow small teams reasonable time to respond.

BEL is willing to contribute the perspective of a small regional network. We support accountability for matters management can influence and practical improvements where performance falls short. A fair approach must also recognise regional operating conditions and the costs of additional regulation.

BEL asks the Commission to assess performance in context, show that proposed changes will deliver benefits greater than their costs, and allow practical approaches suited to each network. This would protect affordability and effective operations while maintaining clear expectations for all EDBs.

Sincerely,



Shannon Hollis
CHAIR
Buller Electricity Ltd



Jan Coll
CHAIR
Buller Electric Power Trust