To:	Simon Wakefield Commerce Commission New Zealand Level 9, 44 The Terrace PO Box 2351 Wellington 6140 **By E-Mail:** infrastructure.regulation@comcom.govt.nz
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Industry support of ENA Submission to the Commerce Commission on achieving better outcomes for electricity consumers.

As EDB's, we have a responsibility to provide safe, reliable, and affordable electricity, while managing infrastructure investments to meet current and future demand. It is this premise that forms the foundations for the decisions we make, complemented by the regulatory framework in which we operate to achieve best outcomes for consumers. To this we are committed.

Meeting this commitment requires EDBs and regulators to achieve a greater level of common understanding and agreement as to what 'better outcomes for electricity consumers' entails. As an industry we strongly support the desire for a joint vision that benefits electricity consumers, however that vision must recognise the variance across the industry instead of looking to proscribe a single regulatory determination of what the 'right' way of achieving it is.

Debate frequently centres on perceived inefficiencies within the sector. While there is always scope for improvement, prescribing a standardised approach risks creating further inefficiencies by failing to recognise the operational differences between EDBs. Equally, a perceived lack of progress may overlook the significant investment underway in foundational capabilities, including network modelling, data and systems, that are essential to achieving longer-term objectives.

The regulatory focus should therefore be on defining clear outcomes and performance expectations, rather than prescribing how they must be achieved. This would allow EDBs to pursue the most efficient solutions for their networks and consumers. We strongly support the ENA submission, which sets out a robust approach to achieving this.

The ENA submission clearly articulates the challenges that EDBs are facing while recognising that more can be done to help drive informed decisions that lead to greater performance and consumer benefits. It supports the three pillars associated with the indicative vision; deliver core network operations well, have strong commercial arrangements in place, and build capability for the future. It also clarifies that while these are supported, implementing regulation to achieve the vision without robust evidence may derail the intent of what is trying to be achieved.

Part of that challenge is understanding and agreeing on priorities. The ENA letter highlights the extensive number of requests and initiatives being asked of the industry across the regulatory framework, 188 entries across 37 distinctive initiatives, from the Commission, EA, MBIE, Minister and others. In addition, often the demands required are competing with themselves. As the ENA points out the industry is advised to make prices more cost reflective, yet also avoid price shocks, to invest but keep prices down, improve resilience but minimise expenditure. We support moving forward to meet these challenges however guidance on the true priority, across all regulating bodies, will drive desired outcomes vs run the risk of fraction and the potential for ongoing divergent views and/or approaches.

We therefore strongly agree with and recommend the ENAs approach to determining a workable pathway to delivery, one that sees industry and regulators work together to outline a set of clear priorities that all parties can commit to. This unified approach would provide the platform for all parties to understand the complexities and demands being faced from both sides, industry and government, while ensuring that any agreement, regulatory or otherwise, was based on clear measurable evidence-based analysis.

This approach also ensures trade-offs are clearly known and accepted as part of an informed collaborative decision-making process, avoiding simply piling on more requirements that will overload rather than improve the performance of the sector. It is this approach that will best protect the interests of consumers and de-risks viewpoints that may be of a self-serving nature for the sector or participants.

Ultimately at its core we want the same thing. A network of EDBs that deliver for consumers and communities now and into the future. It is why we firmly believe and support the ENA's proposed structured approach to collaboration, proactive engagement and prioritisation working with regulators and government, to drive the electricity consumer outcomes the Commission is seeking.

This joint response is further evidence of that willingness in action and how the sector is looking to jointly collaborate with each other, and regulators, to drive decisions that benefit the consumer recognising that their needs, like the EDBs signed to this letter, are also varied according to location, size and situation, yet the ultimate vision remains.

As a collective group of EDB's representing a range of networks (exempt and non-exempt businesses), we support the Electricity Networks Aotearoa (ENA) submission and welcome further engagement with the Commerce Commission to reach the ambition outlined in the consultation.

Yours sincerely



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