[redacted]

From: Infrastructure Regulation
Sent: [redacted]
To: [redacted]
Subject: FW: Submission on Orion CPP 2027 Proposal

[redacted]

From: [redacted] <[redacted]>
Sent: Tuesday, 25 August 2026 6:05 pm
To: Infrastructure Regulation <infrastructure.regulation@comcom.govt.nz>
Subject: Submission on Orion CPP 2027 Proposal

[redacted]

To whom in may concern,

I am an electricity consumer within the Orion network area and have concerns regarding the need for Orion's proposed Customised Price Quality Path (CPP).

While I support investment in network safety, reliability, resilience, and future growth, I am not convinced that Orion has demonstrated a need for a CPP to achieve these outcomes.

The Commerce Commission notes that Orion has consistently met its quality standards in recent years and is seeking expenditure approximately 20% higher than the default regulatory allowances. The Commission has also questioned whether the benefits of this increased expenditure have been sufficiently demonstrated and whether all proposed expenditure is required within the CPP period.

Over recent years, Orion has successfully delivered significant network investment under the existing DPP framework. This includes the completion of the Norwood Substation and associated reinforcement works throughout Selwyn, the near-complete Burnham Substation project, the Milton to Bromley 66kV cable, and the redevelopment of Milton Substation. These projects have delivered substantial increases in network capacity and security of supply across Christchurch and the wider Canterbury region.

These examples demonstrate that Orion has been able to accommodate growth, increase capacity, improve security of supply, and maintain network performance without the need for a CPP. Future reinforcement and growth projects have also been identified and planned within existing investment programmes.

The Commerce Commission has also noted that Orion has met its quality standards and is seeking to retain the same quality settings under the proposed CPP. In my view, this raises a legitimate question as to whether the scale of the proposed expenditure increase is justified by the expected benefits to consumers.
Orion has demonstrated strong resilience and network performance over the past decade and has continued to maintain service quality while delivering major network upgrades under the existing

regulatory framework. From a consumer perspective, this further supports the view that Orion has been able to effectively manage growth, capacity requirements, and network risks without requiring a CPP.

I am particularly concerned about the cost impacts on consumers. Households and businesses continue to face significant cost of living pressures, and any substantial increase in electricity distribution charges should only occur where there is clear evidence that the expenditure is necessary and will deliver measurable benefits.

In my view, Orion should continue to focus on prudent and efficient investment and demonstrate that the existing DPP framework is insufficient before consumers are asked to fund a significant increase in expenditure.

Thank you for considering my submission.

[redacted]