

14 August 2026

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

Dear Elloise,

Submission to the Commerce Commission (Commission) on the Resilience Principles: Decision-making framework for critical infrastructure draft guidance document

Electricity Networks Aotearoa (ENA) appreciates the opportunity to comment on the Commission's *Resilience Principles: Decision-making framework for critical infrastructure draft guidance document*.

ENA is the industry membership body that represents the 28 electricity distribution businesses (EDBs) that take power from the national grid and deliver it to homes and businesses (our members are listed in Appendix A).

EDBs employ over 7,800 people, deliver energy to more than two million homes and businesses, and have spent or invested \$6.8 billion in network assets over the last five years. ENA harnesses members' collective expertise to promote safe, reliable, and affordable power for our members' customers.

ENA's key messages

- ENA supports the draft resilience principles and the Commission's aim of improving the quality and transparency of resilience investment decision-making.
- The guidance is a useful starting point and the "what good looks like" section helps show the direction of travel. The main opportunity is to clarify how the guidance will be used across the Commission's regulatory processes.
- The Commission should coordinate its resilience work with existing government, regulatory and sector initiatives so that the final framework complements, rather than duplicates, existing resilience obligations, guidance and reporting.
- Proportionality should be practical and should focus analysis on material, credible and reasonably foreseeable risks. The level of evidence and analytical sophistication should reflect the scale, uncertainty and consumer consequences of the decision, recognising that complex modelling and additional analysis impose costs that are ultimately borne by consumers.

- For information-disclosure-only EDBs, existing asset management plans and disclosures are likely to be the main way relevant evidence is presented. Any move beyond that should be consulted on through the usual information disclosure process.
- The Commission should recognise and learn from sound existing sector practice, including the EEA Resilience Guide, where businesses use it, without requiring providers to abandon approaches that already achieve the intended outcomes.
- The multi-hazard risk assessment approach in the guidance should be matched by a reopener framework that can deal with connected, concurrent and sequential events.
- Consumer, community, iwi and hapū engagement is important, but should also be proportionate and coordinated. The Commission should clarify when providers can rely on existing government, regional, sector or community engagement, when additional provider-specific consultation is expected, and how engagement evidence should be weighed alongside technical evidence and risk-bearing capacity.

1. Overall position

ENA supports the draft resilience principles. They provide a sensible and useful framework for understanding resilience risks, evaluating impacts, considering options and making investment decisions. The emphasis on evidence, uncertainty, interdependencies, consumer outcomes and a broad range of mitigation options is consistent with good industry practice.

The guidance is also useful because it brings these matters together in one place, explains what good practice can look like, and recognises that resilience is a journey. It usefully reflects the Commission's view that resilience is wider than asset hardening and includes organisational resilience, information and planning systems, physical system attributes and investment decision-making.

ENA's comments are therefore directed mainly at how the guidance will be applied in practice. Greater clarity on its use across the Commission's regulatory processes would help providers understand the level of evidence expected, support more consistent application and preserve appropriate judgement and flexibility.

2. The principles

ENA supports the principles as a coherent set of prompts for good decision making. In particular, the draft usefully emphasises:

- a system and service-outcome perspective rather than isolated asset projects;
- multi-hazard and cross-sector risks, while recognising uncertainty;
- distributional impacts and the different capacity of consumers and communities to bear disruption;
- structured optioneering, including non-network, operational, staged and adaptive responses; and
- governance visibility of residual risks and trade-offs.

ENA also supports explicit recognition that resilience may be improved through operational and organisational measures, including contingency planning, strategic spares, redundancy, mutual aid and supply-chain arrangements. These measures may materially reduce the consequences of an event and should be considered alongside capital investment options.

The final guidance should avoid absolute language such as “all hazards”, “all interdependencies” or “all costs and benefits”. A provider should be expected to consider material, credible and reasonably foreseeable matters, using evidence that is proportionate to the decision. Qualitative assessment and engineering judgement should remain valid where reliable data is unavailable or quantification would add little value. The Commission should also recognise examples of sound existing practice across infrastructure sectors. This would help providers understand which aspects of their current approaches already align with the principles, support learning between sectors and reduce the risk of unnecessary changes to practices that are working well. ENA is not suggesting that one sector framework should become the cross-sector standard.

3. Practical application

3.1 Clarify status and regulatory use

The draft says the guidance is not an immediate requirement and that the “what good looks like” section is not a checklist, but also says that providers should move to fuller application within a “reasonably short timeframe” and that the Commission will expect systematic and robust evidence for material expenditure. These statements could lead suppliers, auditors and reviewers to treat the guidance as a checklist.

It would therefore be helpful if the Commission could clarify how it intends to use the guidance in practice. The final guidance should explain the role it will play when the Commission considers price-quality proposals, reopeners, expenditure forecasts, information disclosures and other regulatory assessments, particularly where it expects systematic and robust evidence for material expenditure and progressive movement towards more mature practice.

In particular, it would be helpful for the Commission to clarify:

- whether the guidance is intended primarily to help providers structure and explain existing evidence, or whether additional analysis will generally be expected;
- how providers may demonstrate the principles through alternative approaches suited to their circumstances;
- how the Commission will distinguish between baseline expectations and more mature practice; and
- what weight the Commission will place on the guidance when assessing material resilience expenditure.

This clarification would give providers greater certainty while preserving the principles-based and non-prescriptive nature of the guidance.

3.2 Information-disclosure-only EDBs

For EDBs subject only to information disclosure, the draft indicates that relevant aspects of resilience planning and investment should be reflected in disclosures in a way that is consistent with the nature of

the supplier, the risks faced and the decisions being advanced. ENA supports that proportionate approach.

For most EDBs, asset management plans and existing risk, expenditure and quality disclosures are likely to be the natural place to explain material resilience risks, decision processes and planned improvements. The Commission should clarify whether it expects anything more than this. Any new standardised disclosure requirement should be developed through the usual information disclosure consultation process and should have benefits proportionate to its cost.

Greater consistency in how material resilience matters are explained could benefit consumers, providers and the Commission. The aim should be clearer ex-post transparency, not approval of individual investments for information-disclosure-only suppliers.

3.3 Make proportionality and materiality practical

Resilience will rarely be the only driver of an investment. EDBs need to consider resilience alongside renewal, growth, reliability, safety, affordability, compliance and other network needs. Proportionality should therefore reflect the role resilience plays in the overall decision. The guidance should not require a standalone resilience assessment where relevant resilience considerations have been appropriately incorporated into the provider's wider investment decision-making process.

The draft appropriately recognises proportionality and judgement, but ENA considers these concepts could be taken a little further in the final guidance. A simple tiered illustration could help providers understand how the expected level of analysis should increase with materiality, complexity and uncertainty of the decision, without turning the guidance into a rigid set of rules. ENA suggests an indicative tiered approach such as:

INDICATIVE TIER	TYPICAL DECISION	PROPORTIONATE EVIDENCE
Routine / embedded	Routine renewal, maintenance or augmentation where resilience is one of several considerations and may not be the main investment driver	Normal asset-management and approval evidence, with a concise explanation of how relevant resilience considerations were addressed.
Material programme	Material expenditure, a changed standard, or a decision with concentrated consumer or community consequences	A documented risk case, options, impacts, sensitivities and programme prioritisation, drawing on existing evidence where appropriate.
Major / novel	Large, novel or difficult-to-reverse proposal with material uncertainty	A fuller business case, wider engagement, relevant cross-sector evidence, adaptive pathways and proportionate assurance.

The same tiering principle should apply to the analytical tools and models referenced in the guidance. Some are well established and relatively straightforward to apply. Others require specialist capability, extensive datasets and sophisticated modelling and are closer to leading-edge or state-of-the-art practice than to a reasonable baseline expectation for all providers.

ENA therefore considers that the final guidance should more clearly distinguish between tools that represent normal good practice and those that may be useful for particularly material, novel or uncertain decisions. The Commission could assist by providing guidance on the circumstances in which different tools are likely to add value, including their data requirements, complexity and limitations.

The level of analysis should also recognise whether the necessary data is reasonably available and reliable. Providers should not be expected to commission new datasets or sophisticated modelling as a matter of course where the cost is disproportionate or where the underlying data cannot support the apparent precision of the analysis.

The choice of method should be driven by the decision being made rather than by an expectation that the most sophisticated available technique should be used. Where reliable data is limited, a simpler qualitative or semi-quantitative approach, supported by engineering judgement and sensitivity analysis, may produce a more robust and transparent result than a complex model built on weak assumptions.

This is also important from a consumer perspective. More sophisticated analysis is not costless. It can require specialist staff, external advisers, new datasets and significant modelling effort. Those costs are ultimately borne by consumers. The Commission should therefore be clear that the objective is sufficiently robust analysis to support a sound decision, not analytical completeness for its own sake. The incremental cost and effort of additional analysis should be justified by the value it is expected to add to the decision.

In that sense, proportionality should apply not only to the investment itself, but also to the analysis used to support it. The framework should avoid creating incentives to gold-plate business cases or adopt advanced techniques where they are unlikely to change the decision or materially improve consumer outcomes. The Commission could also help providers target their effort by signalling the areas that most often give rise to concern when assessing resilience expenditure — for example, the evidence of need, the range of options considered, the treatment of uncertainty, consumer impacts, timing, or the justification for the preferred option. Greater transparency about those areas would help providers focus analysis on the issues most relevant to the Commission's assessment and reduce unnecessary cost.

3.4 Implementation and maturity

The draft's recognition that providers are at different stages of maturity is helpful. ENA agrees that providers should continue moving towards more systematic and well-supported resilience decision-making over time. However, the guidance should distinguish clearly between *good industry practice* that may reasonably form a baseline expectation and *best practice* or leading-edge approaches that may represent a longer-term maturity objective.

Feedback from ENA members suggests that substantial application of the guidance as a whole would represent a relatively mature level of resilience practice. The Commission should therefore be clear about what it regards as a reasonable baseline for providers at different stages of maturity, as distinct from examples intended to illustrate more advanced practice. This distinction is particularly important where the guidance refers to more sophisticated analytical approaches, as discussed in section 3.3 and ENA's response to consultation question 8 in Appendix B.

The Commission should also clarify what “progressively” moving towards more mature practice means in regulatory terms. In particular, it would be helpful to explain how the Commission would assess progress over time and how it would respond if it considered that a provider was not progressing sufficiently,

including whether concerns would first be raised through engagement, summary and analysis, or a future formal regulatory process.

This would preserve flexibility for providers to develop their capability in a way that reflects their circumstances, while giving greater certainty about the practical consequences of the guidance.

3.5 Align the multi-hazard approach with reopeners

The draft appropriately recognises that hazards may occur concurrently, sequentially or through cascading effects. ENA supports that approach. However, the current unplanned reopener settings have caused practical difficulties in the past where impacts arise from more than one connected incident. There is therefore a mismatch between the multi-hazard risk assessment the guidance promotes and the incident-based regulatory relief available after an event.

ENA recommends that the Commission consider amending the reopener criteria in a future input methodologies process so that causally connected, concurrent or sequential hazards can be assessed together where that is necessary to evaluate an efficient recovery programme. The regulatory response should be capable of matching the risk framework the Commission expects providers to use.

3.6 Support cross-sector co-ordination

The draft rightly emphasises interdependencies and the need for infrastructure providers to take a system-wide view of resilience. ENA supports that approach.

Resilience is already the subject of significant work across central and local government, emergency management agencies, infrastructure regulators, Lifelines Groups and sector organisations. This includes work by the Department of the Prime Minister and Cabinet, the National Emergency Management Agency, the New Zealand Infrastructure Commission, local government and sector bodies such as the Electricity Engineers' Association (EEA).

The Commission should seek to align its resilience work with these existing programmes and frameworks. The aim should be to avoid creating parallel definitions, maturity frameworks, data requirements, reporting obligations or coordination processes where suitable approaches already exist or are being developed elsewhere.

This is particularly important for cross-sector issues such as hazard information, infrastructure interdependencies and emergency response arrangements. No single infrastructure provider can independently map or assure the resilience of every connected service, and some relevant information is held by public agencies or other providers and may be sensitive. Existing forums, including Lifelines Groups and emergency management arrangements, already provide mechanisms for sharing information, understanding interdependencies and coordinating preparedness and response. The Commission should make use of those arrangements where possible rather than establish duplicative processes.

The Commission can add value by using its cross-sector role to help coordinate existing work, identify gaps and clarify how its economic-regulation role fits alongside wider resilience responsibilities. This could include supporting common hazard information, secure information-sharing arrangements and consistent assumptions where appropriate.

Clear allocation of responsibility is also important. Providers should be accountable for reasonable efforts to understand and manage material dependencies within their control, rather than being required to

duplicate work already being undertaken through other recognised processes or to assume responsibility for matters controlled by others.

Related questions arise where resilience investment by one provider creates material benefits for other infrastructure sectors. Those cross-sector benefits may properly form part of an investment assessment, but the guidance should recognise that questions of accountability and cost allocation may arise. It should not be assumed that one regulated provider, or its consumers, should automatically bear the full cost of addressing a wider system vulnerability.

Consistent terminology would also support effective coordination. ENA encourages the Commission to align key definitions and terminology with other established resilience frameworks where possible, and to include a short glossary for key terms such as resilience, hazard, risk, vulnerability and criticality. Differences in terminology may sometimes be justified by the Commission's particular regulatory role, but unnecessary divergence can create confusion and make cross-sector comparison and reporting more difficult. Where the Commission deliberately adopts a different definition, it would be helpful to explain the reason for that difference.

The Commission should also review whether aspects of its resilience definition, including the concept of "prevention", operate clearly across hazards that cannot themselves be prevented.

Better coordination across agencies and sectors should also extend to community engagement, as discussed below.

3.7 Make consumer and community engagement expectations practical

ENA supports the guidance's emphasis on understanding consumer and community perspectives. In particular, the distinction between risk tolerance — what consumers want or are willing to accept — and risk-bearing capacity — what consumers and communities can actually cope with — is useful. ENA also agrees that willingness to pay should not be treated as determinative where affordability constraints may mask significant need or exposure.

This creates an important practical judgement for providers. Consumer feedback may, for example, indicate a preference not to incur the cost of additional resilience investment, while other evidence suggests that the consequences of service failure would be significant or that the affected community has limited capacity to cope with disruption. In those circumstances, the guidance indicates that expressed willingness to pay should not necessarily determine the investment decision, but provides less guidance on how providers should make and evidence that judgement.

ENA considers that further guidance would be useful on how different forms of evidence should be weighed where they point in different directions. This could include the role of technical risk assessments, risk-bearing capacity, safety and statutory obligations, critical service and infrastructure dependencies, the needs of vulnerable or isolated consumers, affordability impacts and evidence obtained through consumer and community engagement. Where a provider reaches a decision that differs materially from expressed consumer preferences, the Commission should clarify what evidence and explanation it would expect to support that decision.

The practical challenge is determining what level and form of engagement is appropriate for a particular resilience decision. Infrastructure providers do not engage with communities in isolation. The same consumers, communities, iwi and hapū may also be consulted by local and central government, other infrastructure providers, emergency management agencies and regulators. Repeated engagement on closely related issues risks consultation fatigue and may not improve the quality of the decision.

ENA therefore considers that the final guidance could say more about what proportionate engagement looks like in practice. In particular, it would be helpful to clarify when providers can reasonably draw on existing evidence — such as government strategies, regional or spatial plans, local authority consultation, Lifelines work, existing iwi and hapū relationships, consumer research or engagement undertaken by other infrastructure providers — and when additional provider-specific engagement is expected.

This is particularly relevant where an EDB investment forms part of a broader regional resilience outcome. For example, a community's priorities for growth, land use, critical services and emergency resilience may already have been considered through regional or local planning processes. Further engagement by the EDB may still be appropriate where the investment involves material trade-offs or impacts that were not considered through those processes, but duplicating consultation should not be an objective in itself.

The Commission could also provide more guidance on how engagement evidence should be weighed alongside technical and other evidence. Consumer perspectives should be an important input to investment decisions, but not necessarily a veto. Where willingness to pay is low, providers may still need to consider risk-bearing capacity, safety, service dependencies, vulnerable consumers, statutory obligations and the consequences of a major service failure. The guidance would benefit from examples showing how these different forms of evidence can be brought together when they point in different directions.

There is also scope for better coordination of engagement across sectors. Where several infrastructure providers are considering the same community, hazard or regional resilience issue, joint or coordinated engagement may be more useful and less burdensome than each provider consulting separately. Existing forums and relationships, including Lifelines Groups and established iwi and hapū engagement arrangements, should be used where appropriate.

The aim should be enough engagement to inform a sound decision, not engagement for its own sake. Engagement should improve the evidence available to the provider and help it understand community needs, preferences and risk-bearing capacity; it should not transfer responsibility for complex resilience trade-offs from the provider to consumers. Greater clarity from the Commission on when existing evidence is sufficient, when targeted additional engagement is warranted, and how different sources of evidence should be weighed would help providers achieve that balance.

4. Priorities for the Commission's next steps

ENA recommends that the Commission focus its next work on the following practical matters:

- publish a short statement explaining how the guidance will be used across default and customised price-quality paths, individual price-quality paths, reopeners, information disclosure, quality regulation and summary and analysis;
- provide worked examples showing how proportionality and materiality affect both the level of evidence expected and the choice of analytical tools, including when simpler qualitative or semi-quantitative approaches are sufficient;
- signal the aspects of resilience expenditure proposals that most often require stronger evidence or give rise to regulatory concern, so providers can focus analytical effort where it is most useful;
- provide practical business-case examples, including examples of investments that proceeded, were staged, deferred or rejected;

- provide practical guidance on proportionate consumer and community engagement, including when existing government, regional, iwi or sector engagement can reasonably be relied on, when additional provider-specific engagement is warranted, and how engagement evidence should be weighed alongside other evidence;
- use its cross-sector role to support co-ordination on hazard, interdependency and valuation information and to reduce duplication across government, regulators and sector initiatives;
- explain how existing sector guidance and maturity tools may be used to demonstrate alignment with the principles;
- clarify the escalation path if the Commission considers that a provider is not progressing sufficiently; and
- consider, through a future input methodologies process, how the reopener framework could better accommodate connected multi-hazard events.

The ResOrgs report identifies practical guidance, business-case guidance, maturity tools, better interdependency information and community-based resilience planning as areas for further work. ENA agrees these would be useful next steps and considers that they should be developed collaboratively and proportionately.

5. Conclusion

ENA supports the resilience principles and the Commission's intention to improve resilience decision making. The principles are sensible and the guidance provides a useful foundation, including through its "what good looks like" section and its recognition that resilience practice will develop over time.

The main opportunity is to make the practical application of the guidance clearer. A proportionate and transparent approach will help providers understand expectations, support more consistent evidence and preserve room for judgement and sector-specific approaches.

ENA encourages the Commission to finalise the principles, clarify their regulatory use, and continue working with infrastructure providers and other agencies on practical implementation. The final framework should build on sound existing practice, support useful consistency and align the Commission's multi-hazard expectations with the regulatory mechanisms available to EDBs.

We have provided responses to the specific questions asked by the Commission in Appendix B.

ENA thanks the Commission for considering these comments. If you have any questions about ENA's submission please contact Gemma Pascall, Regulatory Manager ().

Yours sincerely

Gemma Pascall
Regulatory Manager

Appendix A: ENA Members

Electricity Networks Aotearoa makes this submission along with the support of its members. Listed below are the lines companies represented:

- Alpine Energy
- Aurora Energy
- Buller Electricity
- Centralines
- Counties Energy
- EA Networks
- Electra
- Electricity Invercargill
- Firstlight Network – owned by Powerco
- Horizon Networks
- MainPower
- Marlborough Lines
- Network Tasman Limited
- Network Waitaki
- Northpower
- Orion New Zealand
- OtagoNet – represented by PowerNet
- Powerco
- Scanpower
- The Power Company – represented by PowerNet
- Top Energy
- The Lines Company
- Unison Networks
- Vector
- Waipa Networks
- WEL Networks
- Wellington Electricity
- Westpower

Appendix B: Responses to the consultation questions

1. Is the draft guidance clear about its purpose and practical status, including the level of analysis and rigour the Commission expects for more material resilience expenditure proposals?

Partly. Its purpose and direction are clear, and ENA supports them. Greater clarity would nevertheless be useful on how the guidance will be used across default and customised price-quality paths, individual price-quality paths, reopeners, information disclosure, quality regulation, and summary and analysis.

2. Is it clear how the draft guidance should be applied proportionately across sectors with different levels of maturity?

Partly. The draft appropriately relies on judgement and recognises differing maturity. A simple tiered example could improve consistency and comparability by showing how the expected level of evidence changes with materiality, novelty, uncertainty and consumer consequences. Proportionality should also apply to the analytical method: sophisticated models should be used where they add sufficient value to justify their additional data, capability and cost requirements, rather than being treated as a general benchmark for good practice.

3. Are there implementation barriers, overlaps, or accountability issues in the wider resilience and regulatory landscape that may affect how this guidance is applied in practice?

Yes. The key issues include co-ordination across agencies and sectors, avoiding unnecessary layers of disclosure, analysis or duplicated work, community engagement and ensuring that regulatory mechanisms align with the multi-hazard approach. Access to common hazard and interdependency information, and clarity about accountability where risks or benefits span several infrastructure providers, could also be explored further. The Commission should work closely with other relevant agencies and existing forums, recognise existing sector guidance where it is used, clarify how cross-sector benefits and costs should be treated, and consider whether the reopener framework should better accommodate connected events.

4. What areas should the Commission prioritise in further work?

Refer to section 4 of the covering letter for a more comprehensive list. The Commission should prioritise: clarifying how the guidance will be used across its regulatory processes; providing worked examples of proportionality and practical business-case examples, including the appropriate use of analytical tools; signalling the evidential issues that most often concern the Commission when assessing resilience expenditure; providing practical guidance on proportionate consumer and community engagement; supporting cross-sector co-ordination on hazard and interdependency information; explaining how existing sector tools may demonstrate alignment; and considering future changes to the reopener framework for connected multi-hazard events.

5. Which aspects of the draft guidance are most helpful for informing your investment decision making, and why?

The guidance is valuable because it provides a common framework, describes what good practice can look like and recognises that resilience capability develops over time. The system-wide framing, multi-hazard awareness, structured optioneering, treatment of uncertainty and focus on interdependencies are also useful prompts for more transparent decision-making and reducing the risk of defaulting to asset hardening.

6. Which parts of the draft guidance are unclear, unnecessary, or could be improved?

The main improvements would be to clarify the regulatory use of the guidance, provide practical examples of proportionality, and replace absolute references to “all” hazards, costs or interdependencies with material, credible and reasonably foreseeable matters. The guidance could also more clearly distinguish normal good practice from advanced or specialist analytical techniques.

The draft’s treatment of consumer, community, iwi and hapū engagement is directionally sound, but further practical guidance would be useful on when existing engagement can reasonably be relied on, when additional provider-specific engagement is warranted, how consultation should be coordinated across organisations, and how engagement evidence should be weighed alongside technical evidence and risk-bearing capacity.

7. Are any principles missing? Are there areas of overlap where the principles could be simplified or streamlined?

The principles are broadly complete and ENA does not propose adding further substantive principles. The Commission could consider presenting the optioneering, costs and benefits, option effectiveness and prioritisation principles as a clearer investment-assessment sequence, but this is a presentational refinement rather than a material concern.

Where a provider already uses the EEA Guide, ISO standards or another sound framework, the Commission should allow that provider to show how its existing approach maps to the principles. This would support consistency without requiring a provider to replace an approach that already delivers the intended outcomes. ISO 22372 can remain one useful reference point rather than the only way to demonstrate good practice

8. Are there any missing frameworks or evaluation tools that should be included or referenced?

Chapter 5 already references the EEA Resilience Guide. It would be helpful for Chapter 4 or Chapter 5 to explain expressly that providers may use sector guidance, cost-effectiveness analysis, robust or least-regrets approaches, stress testing and qualitative or semi-quantitative tools where these are proportionate and suitable for the decision. The guidance should distinguish established good-practice tools from more specialist or leading-edge techniques, and indicate the circumstances in which more sophisticated approaches are likely to add value. Advanced economic models should not be treated as routine expectations, with some of the frameworks and tools in tables 4.1 and 4.2 of the guidance best suited to more material resilience projects.

9. To what extent do you already apply these principles in your resilience-related decision-making processes?

EDB practice varies. Many businesses already apply aspects of the principles through asset management, risk frameworks, engineering standards, network planning, emergency response, Lifelines participation and post-event reviews. ENA supports the draft's flexible approach and asks the Commission to recognise sound existing evidence where it demonstrates the intended outcomes.

10. Do you have practical examples of applying these principles that could be shared?

ENA does not have specific case studies to provide in this submission. Individual members are better placed to provide detailed examples from their own networks, including the context, options considered, evidence used and reasons for the final decision.

11. How should the framework recognise and reflect iwi, hapū, and Māori perspectives?

ENA considers that the draft already gives appropriate prominence to iwi, hapū and Māori perspectives and to place-based engagement. The final guidance should retain that approach, while providing flexibility to use established relationships and existing engagement undertaken through iwi, hapū, local government, Lifelines or other relevant processes. Additional engagement should be targeted to material issues that have not already been adequately considered. Where several agencies or infrastructure providers are engaging on the same resilience issue, coordinated engagement may be more effective and less burdensome than parallel consultation.

12. Which cross-sector vulnerabilities and interdependencies should receive the greatest emphasis?

ENA supports the draft's focus on material cross-sector dependencies and cascading consequences. The particular dependencies that matter will vary by network, location, hazard and event, and ENA does not consider that the guidance needs to prescribe a fixed hierarchy. For EDBs, relevant dependencies may include telecommunications, fuel and transport access, water and wastewater, cloud and operational technology services, emergency communications, critical facilities, skilled people and spares.

The more important task is to provide a proportionate approach for identifying and incorporating material interdependencies into decision-making, supported by cross-sector coordination and secure information sharing. The Commission should also use its cross-sector role to support co-ordination and secure information sharing where no single provider can resolve the issue alone. The guidance should also recognise that where an investment primarily addresses a wider cross-sector vulnerability, questions may arise about responsibility and who should bear the associated costs.