



13 August 2026

Commerce Commission
Head of Regulatory Strategy and Operations
Attn: Dane Gunnell

Dear Dane,

Re: Submission on Draft Resilience Guidance

Greymouth Gas New Zealand Limited ("Greymouth") supports the Commission's objective of improving resilience decision-making. The draft guidance is a constructive framework that promotes evidence-based, system-oriented and consumer-focused analysis.

Greymouth considers one important concept is missing: transition resilience.

1. Resilience should include adaptation to structural change

The guidance addresses uncertainty, adaptation and transformation. However, it largely considers these through the lens of hazards.

Infrastructure systems may also face material changes in demand, utilisation, technology, regulation, and consumer behaviour. These changes can affect resilience outcomes just as significantly as physical hazards.

Greymouth recommends that the guidance explicitly recognise transition resilience as a resilience consideration.

2. Resilience should be assessed at the service and system level

The guidance recognises that resilience extends beyond asset hardening. However, an investment may improve the resilience of an individual asset while reducing the affordability, efficiency or sustainability of the wider system.

For material investments, the relevant question is not simply whether an asset becomes more resilient, but whether long-term resilience outcomes for consumers improve.

Greymouth recommends that material investments demonstrate service-level and system-level benefits alongside asset-level benefits.

3. Adaptation should be considered before hardening

The guidance identifies a broad range of resilience responses, including adaptation, alternative service delivery and asset hardening.

However, it does not clearly signal that adaptation may be preferable to preserving existing infrastructure configurations.

Greymouth recommends that infrastructure providers be expected to demonstrate that adaptation and alternative service options have been actively considered before significant expenditure on asset hardening.

4. Future utilisation and affordability matter

The guidance gives considerable attention to uncertainty but does not explicitly identify future utilisation as a resilience consideration.

A network that remains physically robust but becomes increasingly under-utilised may ultimately face affordability and viability challenges that undermine resilience outcomes for consumers.

Greymouth recommends that material investments be tested against plausible future utilisation scenarios and that affordability be recognised as a resilience outcome in its own right.

Conclusion

The guidance provides a strong foundation for resilience decision-making. Greymouth's principal recommendation is that it be expanded to recognise transition resilience.

Infrastructure resilience is not only about maintaining service through disruptive events. It is also about – particularly for a small and isolated country – ensuring infrastructure systems remain efficient, affordable and adaptable through periods of structural change and uncertainty.

Accordingly, Greymouth recommends greater emphasis on transition resilience, service and system-level outcomes, adaptation before hardening, and future utilisation and affordability.

Yours sincerely

Chris Boxall

Chris Boxall
Commercial Manager

Cc – Gas Industry Company Limited, Treasury, Minister for Energy, Minister for Resources