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Dear Elloise

Resilience Principles Guidance

1. This is Vector's submission on the Commerce Commission's (Commission) draft Resilience Principles guidance.
2. We commend the Commission for progressing this work. Resilience is a critical issue for New Zealand's infrastructure providers and the consumers and communities that depend on essential infrastructure services. The frequency and severity of extreme weather events, alongside other natural, technological and cyber hazards, make it increasingly important that resilience is considered systematically in infrastructure planning, investment and regulatory decision-making.

Vector white paper on resilience

3. We have submitted Vector's white paper on resilience as part of our response to this consultation. This sets out our strategic approach to improving the climate resilience of Auckland's electricity network.

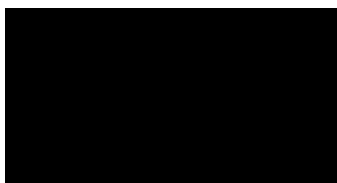
Resilience expectations must be supported by appropriate expenditure allowances

4. Appropriate expenditure allowances are essential to ensure regulated suppliers can make efficient resilience investments.
5. We recommend there be clear alignment between the Commission's expectations under the resilience guidance and the expenditure allowances determined through price-quality regulation.
6. The effectiveness of the guidance will depend materially on whether regulated infrastructure providers have access to appropriate expenditure allowances to implement the resilience measures identified through the framework.

Business continuity and recovery after a disaster

7. We consider the guidance would benefit from greater discussion on business continuity following a major disruptive event and incident management.
8. The guidance appropriately places significant emphasis on proactive asset management and investment to improve the resilience of infrastructure. However, no amount of forward planning or investment can eliminate all disruption. Critical infrastructure providers must also be prepared to respond effectively when a major event occurs.
9. Experience across the infrastructure sector shows that well-developed incident management and business continuity arrangements can make a significant difference to the disruption and hardship experienced by consumers.
10. The Resilient Organisations report recognises business continuity management as a key component of organisational resilience and identifies the quality of business continuity plans as a possible measure of disruption readiness. However, business continuity management appears largely absent from the Commission's draft guidance.
11. We recommend that the Commission expand the guidance to recognise these matters as integral components of resilience, alongside proactive asset management and investment.

Yours sincerely



Richard Sharp
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