



10 October 2025

Commerce Commission

By email registrar@comcom.govt.nz

Huntly Authorisation draft decision

Transpower welcomes the opportunity to submit to the Commerce Commission (Commission) on its draft determination on the application under section 58 of the Commerce Act 1986 from Genesis Energy Limited (Genesis), Contact Energy Limited (Contact), Meridian Energy Limited (Meridian), and Mercury Energy Limited (Mercury). Transpower as the System Operator has a statutory duty¹ to provide information and undertake forecasting on all aspects of security of supply for Aotearoa New Zealand.

Transpower strongly supports the Commission's draft determination that *"On the basis of the available evidence so far, our view is that authorising the Proposed Arrangements is more likely than not to lead to a net public benefit. That is, the Proposed Arrangements will be likely to result in benefits to the public that would outweigh the detriments."* We support specifically the Commission's reasoning that *"the Proposed Arrangements are likely to produce significant security of supply public benefits through the preservation of firming capacity at Huntly relative to a counterfactual in which Unit 2 is retired. We have placed material weight on this public benefit, consistent with evidence from a range of interested parties regarding the likelihood and magnitude of this benefit."*²

This determination, should further Commission deliberation confirm it can be final, would play a crucial role in safeguarding New Zealand's security of supply over the coming decade.

¹ [Electricity Industry Act 2010 No 116 \(as at 30 March 2025\), Public Act 8 Transpower is system operator – New Zealand Legislation](#) clause 8 (2) As well as acting as system operator for the electricity industry, the system operator must (a) provide information, and short- to medium-term forecasting on all aspects of security of supply; and (b) manage supply emergencies.

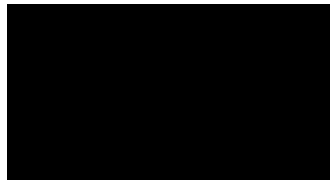
² [Genesis-Authorisation-Draft-Determination-29-September-2025.pdf](#)

The firm energy provided by the Huntly Rankine Units' multi fuel capability represents a vital measure to mitigate dry year energy and capacity risks.

We are also confident that the draft determination aligns with the Government's announcements for securing New Zealand's energy future; a future driven by accelerated build of renewable energy and supported by reliable back-up generation at times of greatest need.

We remain available for any further discussions on security of supply implications as the Commission reaches its final conclusions.

Yours faithfully,

A large black rectangular redaction box covering the signature of James Kilty.

James Kilty
Chief Executive