

16 April 2025

Commerce Commission  
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**WELLINGTON 6011**

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Phone [REDACTED]

Dear Sir / Madam,

**Support for the Central Park Substation – improved resilience**

I am writing to you in my role as Chair of the Wellington Lifelines Group (WeLG). As a group, we were established to coordinate physical risk management activities of Wellington utility and transport service providers.

One of our recent projects, completed and published in 2019, was a Programme Business Case (PBC) on the resilience of infrastructure in the Wellington region. This PBC identified a programme of works that, if delivered as a whole, would improve the economic resilience of the region following a rupture of the Wellington fault (chosen as a realistic and representative hazard). The analysis undertaken in the PBC demonstrated that the work programme would mitigate \$6b of lost GDP against a programme cost of \$5.2b. These figures do not take into account other co-benefits of projects. We believe this provides a compelling case for investment. The full PBC document can be found at:

<https://www.wremo.nz/assets/Library/Reports/Wellington-Lifelines-PBC-MAIN-Combined-20191009.pdf>

One of the projects listed within the programme was 'Central Park Substation – improved resilience', a project that had a small description on page 42/299 of that document - although we worked closely at the time with Wellington Electricity to understand the intent and outcomes of delivering the proposed works. This project would improve the resilience of power supply to parts of the Wellington City area, including the CBD. As such, it is a critical part of the resilience programme.

We understand that Wellington Electricity are seeking permission to have funding allocated to that project. We fully support this project, as part of the above PBC, and urge you to give Wellington Electricity a positive response.

If you have any questions regarding this letter or would like further information regarding the PBC, please contact the WeLG Project Manager, Richard Mowll ([REDACTED]).

Yours sincerely

[REDACTED]  
**Dame Fran Wilde**  
**Chair, Wellington Lifelines Group (WeLG)**