

5 December 2025

Ben Woodham
Electricity Distribution Manager
Commerce Commission
Wellington 6140

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

Dear Ben,

Submission to the Commerce Commission (Commission) on the proposed amendment to the input methodologies (IMs) for electricity distribution businesses (EDBs) – accounting for shifted revenue – draft decision

Electricity Networks Aotearoa (ENA) appreciates the opportunity to make a submission to the Commission on its consultation paper on draft decision proposing an amendment to the IMs to account for shifted revenue.

ENA is the industry membership body that represents the 29 electricity distribution businesses that take power from the national grid and deliver it to homes and businesses (refer Appendix A for list of members).

EDBs employ over 7,800 people, deliver energy to more than two million homes and businesses, and have invested \$6.2 billion in network assets over the last five years. ENA harnesses members' collective expertise to promote safe, reliable, and affordable power for consumers.

ENA supports the proposed amendment

We agree that smoothing affects the timing of maximum allowable revenue (MAR) recovery across default price path (DPP) periods. Requiring any under- or over-recovery arising from back- or front-loading, relative to the profile of building blocks allowable revenue (BBAR), to be reconciled when moving into a customised price path (CPP) is fair and reasonable. The proposed amendment, as drafted, appears to achieve the intended neutrality of revenue recovery.

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:

- Alpine Energy
- Aurora Energy
- Buller Electricity
- Centralines
- Counties Energy
- Electra
- EA Networks
- Firstlight Network
- Horizon Networks
- Mainpower
- Marlborough Lines
- Nelson Electricity
- Network Tasman
- Network Waitaki
- Northpower
- Orion New Zealand
- Powerco
- PowerNet (which manages The Power Company, Electricity Invercargill, OtagoNet and Lakeland Network)
- Scanpower
- Top Energy
- The Lines Company
- Unison Networks
- Vector
- Waipa Networks
- WEL Networks
- Wellington Electricity
- Westpower