

29 January 2026

Ben Woodham
Electricity Distribution Manager

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

Dear Ben,

Submission to the Commerce Commission (Commission) on the Nelson Electricity and Network Tasman merger – Impact on the default price-quality path draft decision

Electricity Networks Aotearoa (ENA) appreciates the opportunity to make a submission to the Commission on its consultation paper on the *Nelson Electricity and Network Tasman merger – Impact on the default price-quality path draft decision*.

ENA is the industry membership body that represents the 29 electricity distribution businesses (EDBs) that take power from the national grid and deliver it to homes and businesses (our members are listed in Appendix A).

EDBs employ over 7,800 people, deliver energy to more than two million homes and businesses, and have spent or 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 our members' customers.

ENA supports the draft decision

ENA supports the pragmatic approach and process for assessing this merger and its price quality (PQ) path impacts. Particularly, we support:

- the draft decision to aggregate the separate opex and capex allowances and then treat any efficiencies achieved through the merger on the same basis as efficiency gains achieved through other means.
- the process whereby EDBs do the work to combine the entity, supported by strong analytical analysis, for the Commission to then review and consult on.
- the proportionate and pragmatic approach to combining the PQ paths, in particular the quality paths, which have the potential to be complex.

We agree with the Commission's assessment that this is in the best interests of consumers as it creates incentives for efficient mergers, with appropriate sharing of gains between EDBs and customers.

If you have any questions about ENA's submission please contact Gemma Pascall, Regulatory Manager ().

Yours sincerely

Gemma Pascall
Regulatory Manager

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Electricity Networks Aotearoa is a trading name of the Electricity Networks Association.

āhuarangi.
kiritaki.
mahi ngātahi.

climate.
customers.
collaboration.

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