

3 August 2026

The Energy Use Policy team  
Ministry for Business, Innovation and Employment  
PO Box 1473, Wellington 6140

By email to: [EnergyUse@mbie.govt.nz](mailto:EnergyUse@mbie.govt.nz)

Dear Energy Use policy team,

**ENA submission to MBIE consultation on draft regulations for regulated Open Electricity**

Electricity Networks Aotearoa (ENA) welcomes the opportunity to provide this brief submission to the Ministry for Business, Innovation and Employment (MBIE) consultation on draft regulations for regulated Open Electricity. No part of this submission is confidential.

ENA is the membership organisation representing all 28 electricity distribution businesses (EDBs) that distribute electricity across Aotearoa (EDBs represented 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 \$6.8 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's understanding is that the proposed open electricity regime applies to electricity retailers as designated data holders and does not impose obligations on EDBs. On that basis, ENA has limited comments on the draft regulations.

We do, however, recommend:

- i) that MBIE clarify that neither the regulations nor the subsequent technical standards will create an implicit obligation for EDBs to develop interfaces or provide information to retailers or accredited requestors. This is particularly relevant if the small-business definition is based on connection capacity, as that term will require a clear and consistent definition and an identified authoritative data source;
- ii) that the wording on connection capacity should avoid describing kVA as an annual measure (in this context kVA is a measure of capacity, not a quantity of consumption over time);
- iii) that the standards clearly distinguish between retail tariff information and EDB pricing categories;
- iv) that the regulations confirm or clarify that the requirement for retailers to describe product eligibility by EDB or price category does not make EDBs responsible for providing or warranting that retail product information.

We hope this submission will be of use to MBIE as you refine the Open Electricity regime and associated regulations. If you have any questions about ENA's submission, or wish to engage further with the distribution sector, please contact Richard Le Gros, Policy and Innovation Manager ([richard@electricity.org.nz](mailto:richard@electricity.org.nz)) in the first instance.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Richard Le Gros', with a long, sweeping underline.

Richard Le Gros

Policy and Innovation Manager

# Appendix A: ENA Members

Listed below are the lines companies represented by ENA:

- Alpine Energy
- Aurora Energy
- Buller Electricity
- Centralines
- Counties Energy
- EA Networks
- Electra
- Electricity Invercargill
- Firstlight Network
- Horizon Networks
- MainPower
- Marlborough Lines
- Network Tasman Limited
- Network Waitaki
- Northpower
- Orion New Zealand
- OtagoNet – represented by PowerNet
- Powerco
- Scanpower
- The Power Company – represented by PowerNet
- Top Energy
- The Lines Company
- Unison Networks
- Vector
- Waipa Networks
- WEL Networks
- Wellington Electricity
- Westpower