

20 December 2024

Consultation: Network connections project: stage one amendments 1

Electricity Authority
Level 7, AON Centre
1 Willis St
Wellington 6011

Submitted by email to connection.feedback@ea.govt.nz

To whom it may concern,

Electricity Networks Aotearoa (ENA) appreciates the opportunity to make a submission to the Electricity Authority (the Authority) consultation on *Network connections project: stage one amendments*.

ENA represents the 29 electricity distribution businesses (EDBs) in New Zealand (see Appendix B) which provide local and regional electricity networks. EDBs employ 10,000 people, deliver energy to more than two million homes and businesses and have spent or invested \$8 billion in the last five years.

In this consultation, the Authority proposes to make a significant change to the scope of its regulation of the distribution sector, by introducing regulated processes for the connection of load to networks. ENA notes that many thousands of connections are made to the distribution networks every year across New Zealand with relative ease for the vast majority of customers. Standard, high-volume connections (often offered for a fixed contribution) are working well for access-seekers, and the Authority's focus would be better directed to non-standard, low volume and more complex connections. ENA has therefore recommended an increase to the Authority's proposed thresholds for both medium and large load connections.

Significant amendments call for additional scrutiny of Code drafting

Given the significant new regulated connections regime that this consultation may introduce, ENA strongly recommends that the Authority hold a second limited technical consultation following this consultation. The purpose of this second consultation would be to allow for review of the proposed Code drafting to ensure that it both meets the Authority's stated intent and does not contain any technical drafting errors. This consultation would be limited to a review of the Code drafting and would not allow for further input from submitters on the substance of the Authority's policy and scope decisions, which by this stage would be known and settled.

Proposed new obligations to connect load customers

The introduction of an obligation to connect load customers is a significant departure from some core principles established when the sector underwent legislated reform in the early 1990s. At that time, Parliament determined that EDBs would be relieved of this obligation, and it was implemented with a one-year grace period under Part VIII of the Electricity Act 1992, which dealt primarily with the licensing of the new “Electricity Suppliers” under Sections 68-73. Section 72, described the duty to supply new consumers, but Section 73 had the whole of Part VIII (including Section 72) expiring and repealed on 1 April 1994.

For the Authority to re-introduce this obligation it is arguably counter to the intentions of Parliament, and something that should be introduced (if genuinely desired) via amendments to primary legislation. As stated above, we are not aware that there are significant problems experienced by access seekers such that they are not being offered a network connection. It is therefore difficult to see what problem this new obligation (to connect load) is intended to resolve.

There are rare, but not implausible situations, where an EDB should retain the ability to refuse to offer a load connection to an access-seeker. These could include:

- a location that would create excessive congestion for other customers and remedy for upstream assets would take some years to install
- a remote exceedingly expensive connection - uneconomic to maintain
- other connections that might lead to undesirable network configurations (e.g. enclaves within other networks, crossing difficult or inaccessible terrain or land, etc).

ENA proposes that the Authority introduce additional provisions to its proposed Code amendments that would allow EDBs to decline a load connection, when reasonable.

Proposed new obligations to maintain connections to load customers

An obligation to connect load introduced via the Code also sits oddly with the existing obligations on EDBs for continuance of supply to existing pre-April 1993 consumers, which is prescribed in legislation. The Authority’s proposed regulated and prescribed terms for load connections do not appear to allow for any situation in which an EDB might justifiably wish to withdraw from ongoing maintenance of a connection to a consumer. Such an obligation would risk perpetuating some of the poor outcomes arising from the obligation to maintain supply for pre-April 1993 consumers, into this new regime. These can include:

- maintaining highly uneconomic connections at a cost to the bulk of network customers
- maintaining connections in highly vulnerable locations (e.g. exposed to coastal erosion and inundation, etc).

Again, this would mean the Authority introducing maintenance obligations in perpetuity to EDBs that the government has previously made a deliberate decision to time-limit — in this case, to pre-April 1993 consumers.

ENA proposes that the Authority introduce additional provisions to its proposed Code amendments that would allow EDBs to withdraw from the ongoing maintenance of existing load connections, when reasonable.

Timescales, defined thresholds and stages of DG and load connection applications

The timescales suggested by the Authority for both the distributed generation (DG) and load connection application processes in these proposals are much too short and inflexible. The Authority has gone to some significant effort to precisely define an appropriate timeline for each individual stage of both DG and load connection application processes. ENA suggests that it would be more practical and workable for the Authority to simply define an over-arching timescale by which DG and connection applications must be progressed to some final offer, without defining precisely how quickly the intermediate steps must occur. Likewise, the Authority could leave it to the sector to define appropriate thresholds for different scales of DG and load connection applications. If the Authority feels strongly that these connection thresholds and interim steps **must** be defined and be consistent across the EDBs, this could be left for the sector to define for itself via a common connections process, with some appropriate backstop arrangement (e.g. these proposals) if the sector is unable to agree and deliver common approach in a timely manner.

Irrespective of whether the Authority proceeds with its current proposals or adopts the ENA's suggestion above, specific clock start/stop for application processes should be defined in the Code. As a general proposition, these clock start/stops should be triggered whenever an EDB is unable to progress a DG or load application due to requiring some action or information from a third party (including the access-seeker).

Standardised connection and queue management policies

As the Authority is aware, ENA has been working closely with the EEA and the Authority as part of the Streaming Connections Project. ENA's element of that project is being delivered via the Future Networks Forum Connections Journey Mapping project, which is working to deliver five 'quick wins' to improve the connections journey for distribution network access seekers. The Connections Journey Mapping project has been working closely with access-seekers (particularly large Distributed Generation customers and public EV charging point operators) to identify potential improvements to EDB connection processes to meet the needs of these customers and address their significant 'pain points.' ENA is happy to work with EDBs, the Authority and key stakeholders to develop the standardised connections and queue management policy that this consultation proposes.

EDB resources may be redirected towards achieving Code compliance

ENA has some concerns that the introduction of strict regulated timescales for processing load applications may cause EDBs to redirect resources that are currently improving customer experience and outcomes. Many EDBs work closely with access-seekers during the pre-

application stage to help them better understand the different connection opportunities available to them (optioneering), before entering a formal connection process. If the Authority's proposals are enacted, EDBs may elect to reduce the scale and scope of these services, or cease them entirely, to ensure that they have sufficient resource available to meet the new obligations imposed by the Code. This may also have the effect of undermining the activities of the FNF Connections Journey Mapping project whose early endeavours have been focussed on standardising and improving much of the pre-application activity and services currently offered by EDBs.

Assessing connections ‘...based on the long-term benefit to consumers’

The Authority has included a requirement that EDBs must (after some preliminary steps) prioritise interactive DG and load connection applications based on an assessment of ‘the long-term benefit to consumers’ of that connection. ENA and its members are concerned about this. ENA does not think that EDBs are capable, nor that it is appropriate, that they should carry out such assessments. It would be preferable, if a ‘tie-break’ assessment must be made between competing potential uses of existing network capacity, that this be based on more tangible and quantifiable elements of the technical characteristics of the connections being sought. The ‘long-term benefit to consumers’ of any particular end-use of an electricity network connection is an extremely subjective test of the worthiness of consumers’ activities, and not one EDBs can make. Equally, it could easily spark disputes, debates and potential legal challenges by aggrieved connecting parties and EDBs should avoid being drawn into such matters.

Introducing flexibility into implementation

Given the significance of the change to sector regulation proposed by the Authority, ENA considers it would be appropriate to allow greater flexibility in terms of the compliance threshold with these Code amendments, at least for an initial period while the sector adjusts and builds capacity to meet these new requirements. ENA recommends that the Authority amend its proposals to require that EDBs must process load applications in accordance with the prescribed timescales for only a fixed percentage of all regulated load applications per annum. For example, within the first year of the Code amendments being operative, an EDB would need to achieve the regulated load application timescales for at least 85% of all applications processed in that year.

As the new regime embeds into the sector, the Authority can monitor performance of EDBs and adjust the compliance threshold (or do away with it entirely) as it deems appropriate. Changes to this compliance threshold would be a relatively trivial change to the Code and could presumably be done as part of routine omnibus Code amendments.

Working constructively with the sector

ENA and members have been disappointed by the implementation processes and timescales that the Authority has imposed with the changes to the Default Distributor Agreement. The timescales available to the sector to implement these decisions have been very challenging – and in some cases, impossible – and earlier engagement with the sector might have mitigated some of these outcomes. Conversely, the sector was pleased with the level of engagement,

genuine consultation and responsiveness of the Authority as the Consumer Care Obligations were developed and would welcome further interaction with the Authority in that mould.

Therefore, irrespective of the decisions the Authority takes as an outcome of this consultation, we urge the Authority to work with the sector to provide early visibility of the timescales that will be imposed to make any significant changes to business processes. ENA is ready and willing to aid the Authority in its interaction with the sector on these matters.

We have engaged with the consultation material and provided what we hope will be useful and constructive input into some of the proposals presented – see Appendix A. Do not hesitate to get in touch with ENA if you'd like to discuss any of the points raised in our submission. Please contact Richard Le Gros (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 horizontal flourish extending to the right.

Richard Le Gros
Policy and Innovation Manager
Electricity Networks Aotearoa

Appendix A - ENA response

Network connections project: Stage one amendments Submission form

Introduction

The Electricity Authority Te Mana Hiko seeks views on the DG proposals in the 'Network connections project: Stage one amendments' consultation paper. To assist you, this submission form includes the questions in that paper in one place, in Microsoft Word and in tabular form.

You are not limited by the questions provided and are encouraged to provide other comments you think are relevant to the Authority's proposals.

Submission details

Submitting organisation	Electricity Networks Aotearoa
Contact person	Richard Le Gros
Contact email	richard@electricity.org.nz

Questions

Proposal A questions: Amend the application processes for larger-capacity DG applications
A) What are your thoughts on the proposal to replace nameplate capacity with maximum export power?
ENA agrees with this proposal.
B) Do you support the proposed Process 2 for medium DG (>10kW and <300kW), including the proposed requirements and timeframes? What are your thoughts on the proposed size threshold? What other changes would you make to the medium DG application process, if any?
ENA refers the Authority to the proposal in our covering letter to this submission under the 'Timescales, defined thresholds and stages of DG and load connection applications' heading.
C) Do you support the proposed Process 3 for large DG applications (≥300kW), including the proposed requirements and timeframes? What are your thoughts on the proposed size thresholds? What other changes would you make to the large DG application process, if any?
ENA refers the Authority to the proposal in our covering letter to this submission under the 'Timescales, defined thresholds and stages of DG and load connection applications' heading.

If the Authority intends to progress with these proposals ENA suggests some changes to the requirements and associated timescales to introduce flexibility for EDBs in achieving compliance. One way to provide some flexibility to EDBs when implementing these proposals would be to begin with a target for compliance, e.g. 85% of medium DG applications must be processed within the proposed timescales. This will provide some scope for EDBs to work in good faith to achieve the new timescales but not be immediately in breach of Code if they fail to do so. The Authority could increase/decrease/remove the targets over time, using their proposed greater reporting by EDBs to monitor performance, as they deem necessary. Additionally or alternatively, the required responses times could be extended for the percentage of applications that fall outside the target, e.g. a 5BD response is required for 85% of medium DG applications, a 10BD response is required for the remaining 15% of medium DG applications. This would be consistent with other regulated processes imposed by the Code, such as the ICP trader switching process.

This flexibility would also reflect that some connections are inherently more technically complex to design and so additional time to work through that complexity is warranted. Making these more complex connections subject to a strict regulated timescale may actually be counter to the interests of the connecting party and see a less favourable/optimal connection arrangement developed.

D) Do you think the Authority should apply any of the proposed changes for large DG to medium DG applications also?

No comment.

E) What are your thoughts on industry developing the detailed policies to complement the Code changes proposed in this paper?

ENA supports allowing the distribution sector to develop the detailed policies to complement the Code changes proposed in this paper. As the paper notes, should the Authority agree to that proposal ENA and EEA would work together, alongside key stakeholders, to develop an appropriate set of guidance and policies to support the sector meeting these new requirements. ENA also refers the Authority to the proposal in our covering letter to this submission under the 'Timescales, defined thresholds and stages of DG and load connection applications' heading, where even further elements of these proposals could be handed to the distribution sector to define.

ENA considers that some elements of a potential connections queue management policy would sit better in the Code provisions associated with these processes. In particular, timescales to progress build of DG assets. The Code could require e.g. a 2 year time to build DG assets, unless otherwise agreed or specified in the relevant EDB connections queue management policy. In this way there would be a clear and consistent baseline expectation set in the Code but with scope for this to be flexed either on a per project basis (with agreement of the connecting party) or on a per EDB basis via that business' connections queue management policy.

F) What are your thoughts on the Authority's summary of capacity rights allocation?

No comment.

Proposal B questions: Add application processes for larger-capacity load

G) For Process 3 for medium load (>69kVA and <300kVA) applications:

- Do you support the proposed process and why?
- What are your thoughts on the proposed requirements, size thresholds and timeframes?
- What changes would you make to the medium-load application process, if any?

ENA re-iterates its comments from our covering letter to this submission – the imposition of a new ‘obligation to connect’ load is a significant intervention in the sector and we encourage the Authority to adopt our recommended additional provisions allowing an EDB to decline a load connection application when reasonable to do so.

ENA refers the Authority to the proposals in our covering letter to this submission under the ‘Timescales, defined thresholds and stages of DG and load connection applications’ heading.

ENA considers that the lower threshold for ‘medium load’ connections is currently set too low. A more appropriate lower and upper threshold would be 300kVA up to and including 500kVA. This would more closely align with the transformer sizes and capacities usually deployed for these types of connections and the technical complexity of these connections. A larger circa 300kVA load connection or above poses higher technical difficulty and needs more detailed assessment than a circa 69kVA connection. This is because:

- A 69kVA connection imposes less of a network load burden, and generally available margins in thermal capacity, voltage performance and the ability to provide back up capacity for outages are not likely to be breached. A simple assessment can be completed unless it is in a known constrained area.
- A larger 300kVA load will impose enough additional load on the network where thermal constraints (ratings of the upstream distribution feeder) need to be checked or voltage performance may be affected.
- The connection of a larger load may prevent the normal back feed of customers in that network segment for either planned or unplanned outages. Analysis is required to confirm expected levels of reliability can be maintained with the new connection included.

In addition, many EDB pricing structures currently support major customers from 300kVa. These customers are often larger businesses important to regional prosperity, and more likely to expand or upgrade moving forward or decarbonise than those less than 300kVa. They are also more likely to employ consultants to inform their installation work and benefit more from EDB advice on capacity e.g. consultants often over prescribe resulting in higher ongoing costs to the customer if not highlighted early in the connection process.

By way of contrast, a 69kVA connection is relatively trivial from a network design/engineering perspective, and so requiring that these connections be subject to a regulated process is unwarranted and may in fact work against the Authority’s objective of simple, straightforward and speedy connections. Correspondingly, we also suggest that the large load connection process lower threshold be set at connections greater than 500kVA.

ENA considers that some elements of a potential connections queue management policy would sit better in the Code provisions associated with these processes. In particular, timescales to progress build of connection assets. The Code could require e.g. a 2 year time to build connection assets, unless otherwise agreed or specified in the relevant EDB connections queue management policy. In this way there would be a clear and consistent

baseline expectation set in the Code but with scope for this to be flexed either on a per project basis (with agreement of the connecting party) or on a per EDB basis via that business' connections queue management policy.

One way to provide some flexibility to EDBs when implementing these proposals would be to begin with a target for compliance, e.g. 85% of medium load applications must be processed within the proposed timescales. This will provide some scope for EDBs to work in good faith to achieve the new timescales but not be immediately in breach of Code if they fail to do so. The Authority could increase/decrease/remove the targets over time, using their proposed greater reporting by EDBs to monitor performance, as they deem necessary. Additionally or alternatively, the required responses times could be extended for the percentage of applications that fall outside the target, e.g. a 5BD response is required for 85% of medium load applications, a 10BD response is required for the remaining 15% of medium load applications. This would be consistent with other regulated processes imposed by the Code, such as the ICP trader switching process.

This flexibility would also reflect that some connections are inherently more technically complex to design and so additional time to work through that complexity is warranted. Making these more complex connections subject to a strict regulated timescale may actually be counter to the interests of the connecting party and see a less favourable/optimal connection arrangement developed.

H) For Process 5 for large load ($\geq 300\text{kVA}$) applications:

- Do you support the proposed process and why?
- What are your thoughts on the proposed requirements, size thresholds and timeframes?
- What changes would you make to the large load application process, if any?

ENA considers that the lower threshold for 'large load' connections is currently set too low. A more appropriate lower threshold would be above 500kVA.

ENA refers the Authority to the proposals in our covering letter to this submission under the 'Timescales, defined thresholds and stages of DG and load connection applications' heading.

ENA considers that some elements of a potential connections queue management policy would sit better in the Code provisions associated with these processes. In particular, timescales to progress build of connection assets. The Code could require e.g. a 2 year time to build connection assets, unless otherwise agreed or specified in the relevant EDB connections queue management policy. In this way there would be a clear and consistent baseline expectation set in the Code but with scope for this to be flexed either on a per project basis (with agreement of the connecting party) or on a per EDB basis via that business' connections queue management policy.

I) Do you think the Authority should apply any of the proposed changes for large load to medium-load applications also? If so, which ones and why?

No comment.

J) What are your thoughts on the Authority's summary of capacity rights allocation?

No comment.

K) What else does the Authority need to consider beyond the proposals in this paper and why?

ENA is concerned that the introduction of an obligation to connect, as well as a regulated process to do so, may drive some perverse outcomes with respect to the use of third-party consultants and contractors to carry out elements of the connection process. If EDBs are subject to these new requirements while these third parties are not, does that make the undertaking of e.g. network power flow studies, civils elements of the connections process, etc, more desirably delivered via the EDB rather than commissioned directly by the connecting party, from the connection party point of view? What are the implications for EDB capacity to support connection processes if it is more desirable for everything to be commissioned by the EDB, where regulated timescales will apply? Under the status quo, EDBs have flexibility to work with access seekers to decide which of the elements of the overall connection process should be delivered by the EDB versus that which the access seeker can engage from their preferred providers (subject to meeting EDB requirements for quality of work, etc).

Proposal C questions: Require distributors to publish a ‘network connections pipeline’ for large-capacity DG and load, and provide information on this pipeline to the Authority

L) Do you support the proposed network connections pipeline, why, why not? What changes would you make, if any? What are your thoughts on the scope of the information to be published?

ENA accepts the benefits that the Authority has outlined for the proposal to publish a network connections pipeline, but highlights the significant new activity this will drive in the EDB businesses. Some flexibility in this requirement to allow for different capabilities within EDB businesses would be sensible – perhaps flexibility in the timescale to comply and the extent of information that needs to be published?

M) What are your thoughts on the proposal for distributors to provide information directly to the Authority on an ongoing basis?

Provided that the information that the Authority requires is a subset of information already held by EDBs, and that the information will be put to some useful purpose, we do not object to this requirement.

Proposal D questions: Require distributors to provide more information on network capacity

N) What do you think of the proposal to publish more information on network capacity? What challenges do you see with providing the data? What changes would you make, if any?

As per our response to the proposal to publish network connection pipelines, we would like to see some flexibility introduced to this requirement to cater for the different capabilities of the different EDB businesses. Again, flexibility in the timescale to comply, and potential the breadth of information that must be published, would be areas where flexibility would be helpful.

ENA notes that Authority’s stated intent “...on improving distributors’ access to smart meter data”. ENA would support a change to these proposals such that they only apply once the Authority has delivered a meaningful change, via Code amendments, that ensures a route for ongoing EDB access to smart metering data.

O) What are your thoughts on the scope and granularity of the information to be published?

ENA is concerned that the regular publication of a list of Zone feeders and LV transformers with their location and capacity will be of limited value to access-seekers while imposing additional obligations on EDBs. We can also foresee that requiring any more sophisticated offering (e.g. capacity information presented via some geospatial tool or similar) would impose a quite resource-intensive obligation and undertaking on EDBs.

ENA suggests that the Authority refrain from introducing this obligation on the sector as currently drafted and takes additional time to work with the sector – ideally via the Streamlining Connections Project – to develop a more useful to access-seekers, but still practical to deploy, means of providing additional capacity information. The Authority can introduce an obligation on EDBs to give effect to this at some later date without materially undermining the effectiveness of the measures it is proposing to introduce in this consultation.

If the Authority does elect to go ahead with this proposal in its current form, we suggest that the updating schedule be amended to avoid the ‘first business day of January’, as this may be impractical due to staffing constraints around holiday periods.

Proposal E questions: Update the regulated terms for DG

P) What are your thoughts on the proposed changes to the regulated terms?

No comment.

Proposal F questions: Add regulated and prescribed terms for load applications and amend dispute resolution requirements

Q) What are your thoughts on the proposed regulated and prescribed terms for load? What changes would you make, if any?

ENA is concerned that the proposed regulated terms for load are largely a ‘copy and paste’ of the existing regulated terms for DG connections. The result is a set of default terms that are not fit for purpose for managing the contractual interface between network owners and connecting parties. ENA advises that the Authority should resile from this proposal to include regulated and prescribed terms for load in these Code amendments, and instead let EDBs retain the ability to work with connecting parties to develop terms appropriate for the circumstances.

In addition, ENA is concerned that the regulated timescales under which load connection agreements must be reached will incentivise connecting parties to ‘wind down the clock’ to ensure that regulated terms apply. This arrangement would significantly undermine EDBs ability to negotiate for appropriate terms for new load connections. We propose that the Authority refrain from imposing regulated terms via the Code on new load connections and allow EDBs and access-seekers to negotiate appropriate terms, as is currently the case.

R) What are your views on the proposed dispute resolution changes for Part 6? In what ways could dispute resolution be further improved? What are your thoughts on the alternative options to deliver dispute resolution discussed in this paper? Do you have any feedback on the 20-business day timeframe proposed?

No comment.

S) Do you consider the alternative contractual terms option discussed in this paper (and in the Distribution connection pricing consultation paper) would be better than the proposal without contractual terms? What are your thoughts on the other alternative options referred to?

Please see ENA's submission on the Distribution connection pricing proposed Code amendment consultation.

Proposal G questions: Increase record-keeping requirements for distributors

T) Do you support the proposal to increase the record-keeping requirements for distributors and why? What changes would you make, if any?

ENA does not agree with the Authority's assertion that "The marginal cost for distributors to capture the additional data should be low." Recording additional data will impose additional costs on EDBs as they reconfigure business processes and resources to ensure compliance with new obligations. We would be more comfortable with these requirements be introduced if this was done to support the additional compliance flexibility we proposed in our responses to C and G.

Proposal H questions: Introduce new Part 1 definitions and amend existing definitions (Part 1 only)

U) What are your thoughts on the proposed new definitions and amended definitions for Part 1 of the Code? What changes would you make, if any?

ENA re-iterates our suggestion in the covering letter to this submission that a further limited technical consultation be run by the Authority on the proposed Code drafting.

V) What other terms do you think the Authority should define and what definitions do you propose for those terms?

ENA is not aware of any other terms that need to be defined in the Code to support these proposals but re-iterates our call for a further limited technical consultation be run by the Authority on the proposed Code drafting.

Proposal I question: Make minor and incidental amendments to Part 6

W) What are your thoughts on the proposed minor and incidental changes to Part 6? What minor and incidental changes has the Authority missed and what changes would you make, if any?

The proposed minor and incidental changes to Part 6 seem appropriate.

Transitional arrangement questions

X) What are your thoughts on the transitional arrangements for the proposals in this paper? Submitters can consider individual proposals when responding to this question.

ENA would like to see some flexibility introduced to timing and scope of the new obligations that may arise from these proposals. A mechanism by which individual EDBs can request a relaxation in timescales for implementation (with justification) would be sensible.

Y) What proposals do you consider the most important? How long do you think is needed to implement these?

ENA considers that the proposals related to the connection of distributed generation are the most incremental and straightforward and could therefore be implemented first. The

introduction of regulation to load connections would be a significant intervention for the Authority and a significant change for the sector. Taking additional time to ensure that the proposed changes are well-considered and designed, and the EDBs have the capability to introduce them effectively, would be time well spent.

Code drafting question

Z) Do you have comment on the Authority's drafting of the proposed Code changes? What changes would you make, if any?

ENA re-iterates our suggestion in the covering letter to this submission that a further limited technical consultation be run by the Authority on the proposed Code drafting.

Appendix B: 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 Energy Distribution
- MainPower NZ
- 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
- The Lines Company
- Top Energy
- Unison Networks
- Vector
- Waipa Networks
- WEL Networks
- Wellington Electricity Lines
- Westpower