

5 February 2026

Commerce Commission – Wai team

By email to: wai@comcom.govt.nz

Dear Commerce Commission Wai team,

Submission to the Commerce Commission (Commission) on the price-quality path for Watercare approach paper

Electricity Networks Aotearoa (ENA) appreciates the opportunity to make a submission to the Commission on its consultation paper on the *Price-quality path for Watercare approach paper*.

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.

Process risks arising from the proposed approach

While ENA appreciates the extension to the submission period, we consider that aspects of the timing and transparency of this process raise broader process considerations. In particular, the approach adopted here could set precedents that are relevant to other regulated sectors, including electricity distribution.

Access to comms and updates

ENA experienced difficulty identifying and subscribing to consultation updates relevant to the water sector. Despite being subscribed to the Commission's 'All regulation' updates, ENA did not receive notifications relating to this or previous water-related consultations. Effective and consistent communication channels are particularly important in the early stages of regulation in a new sector, to ensure stakeholders have a fair opportunity to engage. More details are provided in Appendix B.

Speed of this consultation

Given price-quality regulation is being implemented for the first time in the water sector, early stages of the process necessarily involve a degree of education, capability-building and shared understanding for stakeholders. Price-quality regulation involves complex design choices with long-term implications for consumers and suppliers. In ENA's experience, effective engagement on such matters requires sufficient time for stakeholders to understand, test, and respond to proposed approaches. In this context, the consultation period was short, there is no cross-submission period and releasing key supporting material partway through the consultation period materially constrained stakeholders' ability to engage meaningfully.

Whilst you released this consultation paper on 26 November 2025, you did not release the accompanying proof of concept model until 18 December. With an original submission deadline of 16 January 2026, that gave interested parties 8-13 working days to process this information and respond to it, given normal summer holiday shutdowns.

Condensed overall process

The process outlined in Chapter 6 of your approach paper represents a highly streamlined approach to implementing price-quality regulation in a new sector. ENA notes the absence of issues papers, either before or after the Watercare proposal submission, and there is a lack of clarity on opportunities for cross-submissions.

When compared with the process applied in other sectors when price-quality regulation was first introduced, including fibre most recently, the proposed timelines appear materially compressed.

ENA encourages the Commission to consider whether the proposed process provides sufficient opportunity for testing, iteration, and stakeholder confidence, particularly given the novelty and significance of the regime.

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
- Electricity Invercargill
- 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

Appendix B: Commission comms challenge

Further to our covering letter, it is not easy to sign up for water sector updates, meaning many are likely missing out on important developments. Despite individuals at ENA being signed up to the 'All regulation' mailing list, we have not been receiving water updates and therefore only hear about them 'by chance' or by word of mouth.

Upon notifying this issue to the Commission, the ENA received a reply advising that it was possible to sign up for specific water updates. However, the links for this sign up are not consistent on your website. We double checked these yesterday, 4th February, so the below remains a current challenge:

Per the Water page ([Water – Wai | Commerce Commission](#)), you can sign up for updates:

What's next? | He aha te mea panuku?

We will continue to publish more information about our mahi, key documents, consultation dates and opportunities for engagement.

If you'd like to be kept up to date with our latest updates, [subscribe to our email list](#).

If your interest relates to our Crown monitor role, please contact us at crown.monitor@comcom.govt.nz

When you click on the link to subscribe, you are sent to the 'subscribe and follow us page' (which appears to be the same page as you can navigate to from the 'news and events' menu at the top of the homepage) - [Subscribe and follow us | Commerce Commission](#). From here, you can select the following:

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- Retail Payment Systems
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Water is not an option on this list. And if the 'All regulation' list doesn't receive water updates, then how does one get updates on the water process? Which other stakeholders are also missing key updates?