

20 February 2026

Simplifying Local Government team
Department of Internal Affairs
Parliament Buildings
Wellington

Submission via parliament submission portal

Dear Simplifying Local Government team,

Submission on the Simplifying Local Government – A draft proposal

Introduction

Electricity Networks Aotearoa (ENA) appreciates the opportunity to provide feedback on the Government's draft proposal to simplify local government.

ENA represents New Zealand's 29 electricity distribution businesses (EDBs), which deliver electricity from the national grid to more than two million homes and businesses. EDBs employ over 7,800 people and have invested \$6.2 billion in network assets over the past five years.

ENA supports efforts to improve the clarity and coordination of regional governance. However, there is a risk that electricity distribution infrastructure may be overlooked or insufficiently prioritised in new regional governance and reorganisation processes

ENA recommends that any final legislation and implementation guidance:

- Requires structured engagement with critical infrastructure providers, including EDBs, in the preparation of regional reorganisation plans.
- Requires CTBs to assess impacts on infrastructure planning and consenting pathways when developing reorganisation proposals.
- Ensures regional decision-making frameworks remain aligned with existing national direction for electricity networks.

Electricity networks and national direction

Electricity distribution networks are long-lived assets that underpin housing development, industrial activity, renewable generation connections and the electrification of transport and process heat.

The National Policy Statement for Electricity Networks (amended December 2025) recognises the national significance of electricity networks and requires decision-makers to provide for their ongoing operation, maintenance, upgrading and development. It also requires local authorities to engage with electricity network operators in long-term spatial and strategic planning.

As CTBs assume responsibility for functions such as resource management, regional transport planning and civil defence, it is important that these bodies continue to give effect to the NPS-EN and maintain clear engagement pathways with network providers.

Consistency across council boundaries

Many EDBs operate across multiple territorial authority and regional council boundaries. A single distribution network may therefore be subject to:

- Different district plan provisions affecting substations, overhead lines and underground cables
- Different consenting timeframes and fee structures
- Different road opening and corridor management requirements

These inconsistencies can delay network upgrades, increase compliance costs, and complicate the timely connection of new housing developments and large industrial loads. Regional reform presents an opportunity to improve alignment rather than introduce further variability.

Conclusion

ENA supports the objective of simplifying local government and improving regional coordination. This proposal sits alongside ongoing resource management reform, including future spatial and natural environment planning frameworks. Careful consideration is needed to ensure the interaction between these reform programmes does not create additional complexity for infrastructure delivery.

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 Sophie Tulley (sophie@electricity.org.nz) in the first instance.

Yours sincerely,

Sophie Tulley
Policy and Innovation Advisor
Electricity Networks Aotearoa

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
- Firstlight Network
- EA Networks
- Electra
- Electricity Invercargill
- Horizon Networks
- MainPower New Zealand
- 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
- Westpower