4 March 2026

EECA
Via email: levyconsultation@eeca.govt.nz

Tēnā koe,

## A work plan informed by industry, market and regulatory context

Powerco is one of Aotearoa's largest gas and electricity distributors. Our energy networks provide essential services to over 1 million kiwis and will be core to Aotearoa achieving a net-zero economy in 2050. EECA's initiatives and work programme are relevant to Powerco's customers, our own work programme, and the regulatory context.

Powerco acknowledges and supports EECA's proposal to **maintain the existing 2025/26 levy** funding recovery of $23.259 million. Stability and predictability are important. While the consultation document has some information and examples of activities for FY27, we would like to see **more specific detail of the planned projects** across all 5 work areas, particularly in EECA's regulatory work programme. EECA is one of four regulators in the energy sector, and all regulators are in a position of needing to collaborate and evolve to suit a changing energy sector.

Powerco is pleased that EECA **joined with the EA and Commission to write to EDBs about non-network solutions (NNS)** whereby feedback will inform future work programmes and regulation. We do not expect EECA to finalise the FY27 work programme until this has progressed. Powerco echoes the call for action on NNS, and we are already working collaboratively with EECA and the industry to help understand the best methods for advancing NNS. Allowing this work to reach conclusions would give confidence in where regulation intervention may help or where the market can deliver. The GPS on electricity emphasises the primary role of the market to deliver solutions consistent with our experience that market solutions will be more equitable, affordable and enduring. We are keen to ensure that **any regulatory initiatives are proportionate,** are appropriately assessed using cost-benefit-analysis, avoid impacting material progress already underway in the market, and are technology agnostic to avoid locking in higher costs for consumers, that the market could avoid.

Regulation is one of EECA's three levers, however we are concerned that the consultation paper does not set out FY27 regulatory programme and also identifies regulatory solutions (eg home energy management systems) that may shape the market adversely. We strongly endorse **improved transparency, detail and judgement in use of regulation** across work programmes, in collaboration with other energy regulators and the industry.

We would be pleased to discuss our feedback. If you would like to talk further on the points we have raised, please contact Irene Clarke (Irene.Clarke@powerco.co.nz).

Nāku noa, nā,

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**Emma Wilson**
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**POWERCO**