

27 January 2026

Claire Harkess
Data and Information Disclosure Manager
Commerce Commission
PO Box 2351
WELLINGTON 6140

Sent via email: Infrastructure.Regulation@comcom.govt.nz

Dear Claire

Comfortable with draft decision to lift related party transaction threshold

1. This is a brief cross-submission from the Major Electricity Users' Group (MEUG) on the Commerce Commission's (Commission) reasons paper "*Electricity Distribution ID Amendments – Related party transaction threshold 2025 – Draft Decision*"¹ published on 3 December 2025. This cross-submission does not contain any confidential information and can be published on the Commission's website unaltered. Members may lodge separate cross submissions.
2. MEUG has reviewed the reasons paper and is comfortable with the Commission's proposal to increase the threshold for related party disclosures, due to inflation and increasing costs. The proposal ensures that the Commission's framework continues to meet its policy intent, while reflecting the events occurring within the New Zealand electricity market and broader economy.
3. As electricity distribution businesses (EDBs) broaden out their activities into generation and flexibility services (both competitive markets), MEUG supports the Commission continuing to refine its strong oversight and monitoring of EDBs. Robust oversight of related party transactions and cost allocation, supported by regular information disclosure, will be crucial for understanding the fair balance of expenditure between regulated and unregulated activities, ensuring no harmful cross-subsidisation that may harm consumers or competitive markets.
4. If you have any questions regarding our cross-submission, please contact MEUG on 027 472 7798 or via email at karen@meug.co.nz.

Yours sincerely



Karen Boyes
Major Electricity Users' Group

¹ <https://www.comcom.govt.nz/assets/Documents/amendments-to-information-disclosure-requirements-2025/Electricity-Distribution-Information-Disclosure-Amendment-2025-Draft-Decision-Reasons-paper-3-December-2025.pdf>