

28 January 2026

Ben Woodham
Electricity Distribution Manager
Commerce Commission
PO Box 2351
WELLINGTON 6140

Sent via email: infrastructure.regulation@comcom.govt.nz

Dear Ben

Support for Nelson Electricity and Network Tasman merger

1. This is a brief submission from the Major Electricity Users' Group (MEUG) on the Commerce Commission's (Commission) reasons paper "*Nelson Electricity and Network Tasman merger – Impact on the default price-quality path*"¹ published on 15 January 2026. This submission does not contain any confidential information and can be published on the Commission's website unaltered. Members may lodge separate submissions.
2. MEUG welcomes the decision to merge the price-quality paths for Network Tasman and Nelson Electricity, given recent changes in ownership. This is a positive step, which is aligned with the Government's call for greater efficiency, collaboration and standardisation across New Zealand's 29 electricity distribution businesses. (EDBs).²
3. We are comfortable with the Commission's decision around aggregating the two EDBs' forecast opex and capex allowances and how the Commission propose to set the quality standards and incentive parameters. We acknowledge that this approach should incentivise the two EDBs to achieve efficiencies, with consumers reaping these benefits in the long-term. We expect that the Commission will continue to scrutinise the Information Disclosures of both Network Tasman and Nelson Electricity to ensure these benefits are realised.
4. If you have any questions regarding our 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/2025-reset-of-the-electricity-default-price-quality-path-2/Nelson-Electricity-and-Network-Tasman-merger-Impact-on-the-default-price-quality-path-Draft-decision-reasons-paper-15-January-2026.pdf>

² Action 2.6, <https://www.beehive.govt.nz/sites/default/files/2025-10/At%20a%20Glance%20-%20New%20Zealand%27s%20Energy%20Package.pdf>