

19 April 2026

Ben King
Chief Executive
Department of the Prime Minister and Cabinet
PO Box 55
WELLINGTON 6140

Sent via email: criticalinfrastructure@dpmc.govt.nz

Dear Ben

Enhancing the cyber security of New Zealand's critical infrastructure system

1. The Major Electricity Users' Group (MEUG) welcomes the opportunity to provide feedback on the Department of the Prime Minister and Cabinet's (DPMC) discussion document "*Enhancing the cyber security of New Zealand's critical infrastructure system*"¹ and supporting documents published in February 2026.
2. MEUG members have been consulted on the approach to this submission. This submission does not contain any confidential information and can be published on DPMC's website unaltered. Members may lodge separate responses.

Support inclusion of electricity generation, transmission and distribution as critical infrastructure

3. MEUG represents 15 major electricity users across various sectors in New Zealand, including dairy manufacturing, supermarkets, steel production, cold storage, food processing, packaging, and web services. Electricity is a key input for our members' businesses. It enables our members to support regional communities, employ thousands of people in well-paying jobs, and helps to pay for the essential services we all take for granted that are critical to a dynamic and thriving economy.
4. MEUG welcomes the government's work on cyber security and the proposed approach outlined in this discussion document to both prevent and address cyber harm to our country's critical infrastructure. We support DPMC's proposed inclusion of energy as critical infrastructure, and the thresholds for considering the different components of the electricity system, as set out in Figure 3.² We agree with the incorporation of electricity generation³, transmission and distribution as both critical and essential infrastructure. We are comfortable with electricity retail falling outside the definition of critical infrastructure.

¹ <https://www.dpmc.govt.nz/sites/default/files/2026-03/nz-cyber-security-discussion-doc-feb-2026-v2.pdf>

² Page 9 of the discussion document.

³ Noting that critical electricity generation is classified as over 300 MW in aggregate.

5. MEUG supports all critical infrastructure entities within the electricity sector being required to develop, implement and maintain a risk management programme that aligns with international best practice and any applicable New Zealand-specific requirements. Given that Transpower and electricity distribution businesses (EDBs) in New Zealand are regulated by both the Commerce Commission and the Electricity Authority, we expect that the requirements for managing cyber security will be consistent and aligned with the broader quality expectations set by the two electricity regulators. Managing all risk, including cyber security, is also a well embedded and assumed activity within these entities, given the essential nature of electricity to households and businesses.
6. In addition, MEUG expects that requirements to implement and maintain cyber security systems will be incorporated into the Commerce Commission's decisions for setting the price-quality paths (including revenue and expenditure) for Transpower and the 16 regulated EDBs. From recent discussions with Commission staff, we understand that all regulated EDBs were allocated a step change in expenditure to ensure development of sufficient cyber security frameworks for the current regulatory period (2025 – 2030). We expect the Commerce Commission to monitor this spending and ensure implementation of these systems is undertaken across all EDBs, so all regions have a similar level of protection from potential cyber harm.
7. MEUG supports measure 4, requiring critical infrastructure entities to report any cyber incidents. It is essential that any learnings are shared amongst the electricity sector, so entities can adapt and adjust their systems as needed. We support the government taking a proportionate and stage approach to compliance, as discussed in Table 1⁴ of the discussion document.

Next steps

8. 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

⁴ Page 20 of the discussion document.