

20 March 2026

Tim Sparks
General Manager, Networks and System Change
Electricity Authority
PO Box 10041
WELLINGTON 6143

Sent via email: connection.feedback@ea.govt.nz

Dear Tim

WACC estimate for connection charge reconciliation

1. The Major Electricity Users' Group (MEUG) welcomes the opportunity to comment on the Electricity Authority's (Authority) decision and consultation paper "*Distribution connection pricing reform - minor Code amendments*"¹ published on 3 March 2026. This submission does not contain any confidential information and can be published on the Authority's website unaltered. Members may lodge separate responses.
2. MEUG supports the Authority aligning its approach for WACC within the connection charge reconciliation with the approach taken by the Commerce Commission for setting price-quality paths for electricity distribution businesses (EDBs). Aligning the two regulatory regimes provides consistency and simplicity for those EDBs subject to both regimes.
3. We have reviewed Electricity Networks Aotearoa's (ENA) submission² and agree with their recommendation that the Authority should not specifically reference the 65th percentile in the Code, rather the percentile currently adopted by the Commission. We believe a Code amendment in line with what ENA have suggested would ensure that the Authority does not need to amend the Code anytime the WACC percentile may be adjusted.
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

¹https://www.ea.govt.nz/documents/9368/Distribution_connection_pricing_reform_minor_Code_amendments_Decision_and_cons_1XirtZm.pdf

²<https://www.ena.org.nz/our-work/submissions/document/1591>