

23 February 2025

Committee Secretariat
Finance and Expenditure Committee
Parliament Buildings
Wellington
By email to fe@parliament.govt.nz

To whom it may concern,

ENA Submission on the Local Government (Water Services) Bill

Electricity Networks Aotearoa (ENA) appreciates the opportunity to make a submission on the Local Government (Water Services) Bill. This submission supports those made by Vector and Orion.

ENA represents the 29 electricity distribution businesses (EDBs) in New Zealand (see Appendix A) which provide local and regional electricity networks. EDBs employ 7,800 people, deliver energy to more than two million homes and businesses, and have spent or invested over \$6 billion in the last five years.

Aotearoa requires enormous investment in renewable generation, transmission and distribution – more than \$40 billion by 2030.¹ For many EDBs, a significant amount of their infrastructure such as overhead lines, underground cables, kiosks, transformers or substations, is located within the road reserve. The ability to locate within the road reserve is vital to our ability to carry out our functions and to meet the significant growth projected. In addition to directly powering communities, electricity is also critical to the operation of many other essential services (e.g. reticulated water supplies, mobile and fixed telecommunications infrastructure, etc).

ENA does not support the current wording of clause 116(3) and considers it inappropriate for a broad, general clause to apply to land owned by EDBs. Much of this land contains complex equipment that must comply with minimum safe electrical distance requirements. To address this, clause 116(3) should either be amended to require prior written consent, aligning it with clause 116(2), or explicitly exclude land owned by electricity network operators from its application.

ENA opposes any provision that permits a third party to modify or remove electricity infrastructure, as this could undermine network security and reliability, create significant cost burdens, and introduce serious health and safety risks. Allowing others to carry out work on electricity infrastructure is not appropriate given the complexities involved and the potential consequences for the wider network.

¹ BCG (2022), “The Future is Electric,” [Climate Change In New Zealand | The Future Is Electric | BCG](#).

Under sections 32 and 33 of the Electricity Act 1992, local authorities can require works owners to adjust infrastructure over or under roads. This framework ensures modifications are handled by those with the expertise, resources, and safety protocols needed, making it safer and more effective than the proposed changes in the bill. ENA recommends clause 132 is amended to reflect the current drafting of ss32 and 33 of the Electricity Act 1992.

ENA also notes that clause 132 allows a water service provider to give notice of works without requiring it in writing. ENA recommends that all notices should be in writing.

Do not hesitate to get in touch with ENA if you'd like to discuss any of the points raised in our submission. Please contact Sophie Tulley (sophie@electricity.org.nz) in the first instance.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Sophie', written in a cursive style.

Sophie Tulley
Policy & Innovation Advisor
Electricity Networks Aotearoa

Appendix A

Electricity Networks Aotearoa makes this submission along with the support of its members, listed below.

- Alpine Energy
- Aurora Energy
- Buller Electricity
- Centralines
- Counties Energy
- Firstlight Network
- Electra
- EA Networks
- Horizon Networks
- Mainpower
- Marlborough Lines
- Nelson Electricity
- Network Tasman
- Network Waitaki
- Northpower
- Orion New Zealand
- Powerco
- PowerNet (which manages The Power Company, Electricity Invercargill, OtagoNet and Lakeland Network)
- Scanpower
- Top Energy
- The Lines Company
- Unison Networks
- Vector
- Waipa Networks
- WEL Networks
- Wellington Electricity
- Westpower