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Water Services Regulation Team  
Commerce Commission  
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Tēnā koe,

## **Water information disclosure to include performance data relevant for New Zealand's decarbonised future**

Powerco is one of Aotearoa's largest gas and electricity distributors, supplying around 360,000 (electricity) and 114,000 (gas) urban and rural homes and businesses in the North Island. These energy networks provide essential services to around 1 million kiwis and will be core to Aotearoa achieving a net-zero economy in 2050. As a regulated electricity and gas distributor we are familiar with economic regulation and information disclosure.

In supporting the energy transition as New Zealand decarbonises, Powerco is actively pursuing opportunities for renewable gas (biomethane) as an alternative to natural gas in our pipeline network. This brings us to interact with wastewater treatment plants where biogas could be captured to reduce wastewater emissions, and/or modular solutions could provide a potential income stream as part of the wastewater treatment process, and at the same time contribute to the availability of low carbon gas for the energy system. The economic regulation for water services is a critical opportunity to ensure information disclosure will support decarbonisation and facilitate the market for biogas to ultimately incentivise performance towards wastewater options that capture biogas for beneficial reuse. Powerco cuts across a number of the identified stakeholders in Table 1.2 of the discussion paper. Our feedback is set out in the following:

### **Understanding the type and size of wastewater treatment plants (question 1)**

- Stakeholders with an interest in biogas capture need to understand the type and size of individual wastewater treatment plants.
- This is in order to identify opportunities to work with wastewater treatment providers on innovation, efficiencies, and solutions with consumer benefit.
- Information disclosure in a form comparable across wastewater treatment providers would be invaluable.

### **Information to support opportunities for innovation, efficiency, consumer benefit (question 3)**

- The questions in Table 2.1 are comprehensive. The specific types of information needed to understand performance in Table 2.2 do not clearly respond to the investment performance questions in Table 2.1 and the opportunities for innovation, efficiency and consumer benefit.
- The following is recommended to be included as specific items for wastewater treatment, rather than potentially addressed as part of more generic asset management information:

- Population serviced and volume of wastewater treated at the treatment plant (rather than just 'capacity')
- Waste source, eg volume of industrial wastewater, separated into industry type
- Treatment type
- Level of biogas capture.

This submission does not contain any confidential information and may be published in full. If you have any questions regarding this submission or would like to talk further on the points we have raised, or any aspect of our own experience with information disclosure, please contact Irene Clarke ([Irene.Clarke@powerco.co.nz](mailto:Irene.Clarke@powerco.co.nz)).

Nāku noa, nā,



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