16 October 2026

Ministry for Cities, Environment, Regions & Transport
Via consult.environment.govt.nz/new-planning-system/testing-the-approach-illustrative-npd

Tēnā koe,

New Zealand's New Planning System: Testing the approach to National Policy Direction

Powerco Limited (**Powerco**) welcomes the opportunity to provide feedback to the Ministry for Cities, Environment, Regions and Transport's (**MCERT**) illustrative National Policy Direction: Testing the Approach to National Policy Direction (**iNPD**). We support the intent of the proposed resource management system reform in principle; however, we have concerns with aspects of the illustrative National Policy Direction as currently proposed and consider further refinement is required to ensure the final framework effectively delivers on the Government's objectives.

New Zealand infrastructure providers, including electricity and gas distributors, require clear, enabling policy direction that ensures infrastructure can continue to be operated, maintained and replaced, regardless of the environment in which it is located, so that the communities, people and businesses who rely on these services can continue to do so with confidence.

Is the thematic structure clear and easy to understand?

- The thematic structure of the NPD is clear and generally easy to understand. However, significant tensions between thematic directives remain unresolved and should be addressed at the NPD level to provide greater clarity and consistency. The reliance on cross-cutting directives to guide subsequent Spatial Plans risks deferring key policy decisions that should be resolved nationally.
- In addition, the proposed protection of private property rights requires greater clarity, particularly the use of terms such as "unreasonably", which are open to subjective interpretation and may undermine established statutory protections relied upon by essential infrastructure providers.

Does the NPD provide a clear picture of how National Policy Direction could work in practice?

- The NPD provides a useful indication of how the proposed system could operate in practice, with positive steps such as more direct treatment of reverse sensitivity. However, unresolved tensions between directives and the introduction of undefined terms risk creating uncertainty and inconsistent interpretation.
- Further refinement is needed to clarify how competing policy outcomes will be reconciled and ensure the NPD provides clear, consistent direction nationally, rather than deferring key policy issues further down the funnel.

What important priorities, gaps or trade-offs are not adequately reflected	• Infrastructure directives that capture the full life cycle of activities by including reference to replacement and removal activities; • Trade-offs between existing infrastructure and public values; • Ensuring Infrastructure sub-theme 2: Energy Infrastructure more accurately reflects the components of the entire renewable energy system.

We comment further on these areas and others in the attachment. This submission does not contain any confidential information and may be published in full. If you would like to follow up this submission, please contact the author (planning@powerco.co.nz).

Ngā manaakitanga,



Adam Du Fall
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POWERCO

Powerco feedback:

Our submission only focuses on aspects of the NPD that we consider require amendment, further clarification or additional consideration, and should not be interpreted as addressing or endorsing all aspects of the proposal.

1. Cross-cutting directives

Private property rights	
CC-Directive 1: When implementing this NPD, the use of private land is to be enabled with restrictions only imposed when necessary to ensure others are not unreasonably affected or to provide for important public values.	The proposed protection of private property rights requires greater clarity. We are concerned with *'restrictions only imposed when necessary to ensure others are not **unreasonably** affected'*. The use of the term "unreasonably" is open to subjective interpretation and may undermine established statutory protections relied upon by essential infrastructure providers. The majority of our gas and electricity infrastructure is provided for under Part 3 of the Gas Act 1992 and the Electricity Act 1992; these protections are not visible on a property title. While CC-Directive 4 (c) recognises the role of private agreements, many landowners and councils are not aware of these 'existing use rights'. **Outcome sought:** Include a definition of 'private property rights' or explanatory text highlighting that infrastructure property rights may not be evident on a title, or include reference to statutory rights.

Managing land use and reverse sensitivity	
CC-Directive 3: To protect the operation of existing lawfully established land uses: a) land use plans must: i. enable existing lawfully established land uses to operate without unreasonable constraints ii. ensure new incompatible or sensitive activities are responsible for avoiding or mitigating conflicts with existing lawfully established land uses, both through location and mitigation methods b) local authorities must manage complaints from new, or more intensive, sensitive activities about existing land uses [in accordance with national standards].	We support a directive to ensure lawfully established land uses, particularly where infrastructure is concerned, can continue to operate. The comments above (CC-Directive 1) are also pertinent to this directive. **Outcome sought:** Retain.

Managing land use and reverse sensitivity	
CC-Directive 4	We support buffers to separate and manage incompatible land uses. The National Environmental Standard for Electricity Network Activities includes buffers for activities near the electricity distribution network; we support their inclusion in the new system. **Outcome sought:** Amend CC-Directive 4 to refer to land use **and activities** to ensure this aligns with INFR-Directive 1.7.

Regional Spatial Plans	
CC-Directive 5: Regional spatial plans prioritise growth and change in areas: a) Where infrastructure can efficiently support growth and change b) That make the best use of existing and planned infrastructure c) That support access to housing and labour markets d) Where natural hazards risks can be managed e) That provide for significant environmental and cultural values	Aspects of Directive 5 appear to conflict with HD-Directive 1.5, which promotes urban expansion by providing that land use plans must not include urban growth boundaries or requirements for development to be connected to existing urban areas. Our preference is for CC-Directive 5(a) and (b) to prevail over this directive where there is a conflict. **Outcome sought:** CC-Directive 5 should prevail over HD-Directive 1.5.

Avoiding unnecessary duplication	
CC-Directive 8: Land use plans and natural environment plans should avoid unnecessary duplication or inconsistent regulatory requirements in relation to activities regulated under other legislation.	We support avoiding unnecessary duplication and inconsistency across regulatory frameworks. However, this should not prevent land use and natural environment plans from introducing complementary or additional requirements where existing legislation or standards are outdated or insufficient to achieve appropriate outcomes. The Electricity (Hazards from Trees) Regulations 2003 provide an example where further provisions are warranted. **Outcome sought:** Retain.

2. Theme 1: Housing and Development

2.1 Sub-theme 1: Competitive urban land markets

Urban expansion	
HD-Directive 1.5: To enable urban expansion, land use plans must not include urban growth boundaries or requirements for development to be connected to existing urban areas.	As noted above, this directive is at odds with Cross-Cutting Directive 5, which requires spatial plans to prioritise growth and change in areas where infrastructure can **efficiently** support growth and change and that make the **best use** of existing and planned infrastructure. Electricity distribution businesses have recently received ministerial criticism about the cost of connecting to networks. Promoting out-of-sequence development will, in most cases, require significant network development, thereby increasing connection costs. **Outcome sought:** That CC-Directive 5 prevails over 1.5 or that out of sequence development and development not connected to existing urban areas carries an understanding from the development community that facilitating out of sequence development or development not connected to an existing urban area could require costly infrastructure upgrades and may include extended timeframes.

2.2 Sub-theme 2: Well-functioning urban areas

Enabling intensification	
HD-Directive 2.2: To support well-functioning urban areas, land use plans of [specified urban] councils must, at a minimum, enable [in accordance with national standards]: a) as much intensification as possible in [city centres] b) very high building heights and density in: i. [metropolitan centres] ii. specified catchments of [city centres] c) high building heights and density in: i. [town and local centres]	**General comment:** National standards should provide for levels of intensification subject to compliance with the New Zealand Electrical Code of Practice for Electrical Safe Distances 2001 (NZECP 34).

ii. specified catchments of [metropolitan centres], rapid transit stops and high service frequency transit d) moderate building heights and density in areas such as: i. [neighbourhood centres] ii. specified catchments of moderate service frequency transit and [town and local centres].	

3. Theme 2: Infrastructure

3.1 Sub-theme 1: All infrastructure

Enabling infrastructure	
INFR-Directive 1.2: To enable the timely and efficient delivery of new infrastructure, including all ancillary activities, and upgrades, expansions, replacements and relocations not covered under existing infrastructure directives [INFR-Directive 1.3 & 1.4], land use plans and natural environment plans must: a) recognise and provide for the national, regional and local benefits of infrastructure b) recognise and provide for infrastructure to have an operational or functional need to locate, operate and traverse particular environments c) manage effects on important identified values in accordance with any relevant national standards d) apply targeted standardised plan provisions that recognise the specific needs, locations, accessibility and operational requirements of different infrastructure, such as linear and nonlinear infrastructure [eg, port reclamation, dredging and operating hours] e) recognise the role of the infrastructure provider and requirements under other legislation [eg, Commerce Act for Transpower] in determining the route or location of the infrastructure required.	*Ancillary activities* is not defined, but *ancillary infrastructure activities* is. We suggest using the defined term to ensure the anticipated activities are accurately captured. We recommend that INFR-Directive 1.2(e) be more closely aligned with Policy 4(1)(b) of the NPS-EN. **Outcome sought:** Amend INFR-Directive1.2 to refer to Ancillary Infrastructure Activities. Amend INFR-Directive 1.2 (e) so that it reads '*recognise* ***it is*** *the role of the infrastructure provider and* ***/ or*** *requirements under other legislation [eg, Commerce Act for Transpower] in determining the route or location of the infrastructure required.*

Enabling infrastructure	
INFR-Directive 1.3: To enable existing infrastructure to efficiently and effectively maintain, increase or improve services delivered to people and communities, land use plans and natural environment plans must enable: a) operation, maintenance, upgrade and repowering activities and all ancillary activities to be undertaken without unnecessary restriction within its operational envelope [see interpretation section] b) upgrade and relocation activities outside its operational envelope that increase safety, increase resilience, utilise new technology or reduce environmental effects, subject to infrastructure standards to manage effects.	We recommend including additional wording and a corresponding definition to ensure that existing infrastructure is enabled more holistically. INFR-Directive 1.3 currently refers to 'ancillary activities' (see the comment above suggesting that the defined term *ancillary infrastructure activities* be used instead). Ancillary infrastructure activities describe the supporting activities needed to enable infrastructure work. We suggest including an additional definition and using it in place of 'operation, maintenance' and similar terms to describe more accurately the types of work undertaken on existing infrastructure throughout its life cycle. The term *routine infrastructure activities* should be included and based on the definition in the NPS-EN. We recommend this approach because INFR-Directive 1.3(a) currently omits replacement and removal, which are also common infrastructure activities. Paragraph (a) is also silent on innovation, which could be captured under a definition of routine activities. We support the concept of '*Operational Envelope*' but that additional scope is added to the definition. This is covered further under **Definitions**. **Outcome sought:** Include a definition for *routine infrastructure activities* and amend INFR-Directive 1.3 (a) so that it reads 'routine activities and all ancillary activities to be undertaken without unnecessary restriction within its operational envelope [see interpretation section]

Enabling infrastructure	
INFR-Directive 1.4: To get the most out of existing infrastructure assets, natural environment plans must: a) provide for existing infrastructure to access and use natural resources to provide for ongoing infrastructure services b) recognise existing infrastructure that uses existing natural resources forms part of the existing	We recommend expanding paragraph (b) so that it not only recognises infrastructure that uses existing natural resources as part of the existing environment, but also recognises all existing infrastructure as forming part of the existing environment. This would ensure that ancillary and routine activities that may have effects outside the operational envelope are not assessed as entirely new effects.

environment when assessing environmental effects in re-permitting decisions.	**Outcome sought:** Amend INFR-Directive1.4 b) to '*recognise that existing infrastructure forms part of the existing environment, including where infrastructure relies on the use of natural resources, when assessing environmental effects, including in re-permitting decisions*'.

Infrastructure, the natural environment and historic heritage values	
INFR-Directive 1.5: To manage conflicts between infrastructure and significant natural environment values and significant historic heritage, land use plans and natural environment plans must manage adverse effects in accordance with national standards: a) on high natural character, outstanding natural landscapes and features, and on significant historic heritage excluding sites of significance to Māori, under the Planning Bill, and on all domains where environmental limits have been set under the Natural Environment Bill b) where any breach of environmental limits occurs, by developing and implementing an action plan to remedy the breach within a set target date.	We recommend making it explicitly clear that land use plans and natural environment plans must ensure existing infrastructure located in areas with significant natural values can be operated, maintained, replaced and removed without unnecessary restriction. This infrastructure already forms part of the existing environment. Its effects are well understood and generally periodic and short-lived, and requirements to offset or compensate for cyclical vegetation trimming or removal, or for maintaining access tracks, contribute to infrastructure inefficiency and cost. **Outcome sought:** Existing infrastructure within these areas needs to be able to operate, be maintained, replaced and removed – apply the most permissive planning provisions possible. New infrastructure that can demonstrate a functional or operational need to locate / traverse these environments also needs to be enabled; however significant effects on values should be avoided to the extent practicable.

Infrastructure and other land uses	
INFR-Directive 1.7: To protect existing or planned infrastructure and enable its ongoing operation, maintenance, upgrading and reasonable expansion: a) spatial plans must identify, at a broad level: i. infrastructure and areas where infrastructure needs to be protected from incompatible activities ii. land use patterns to support the ongoing operation and future development of infrastructure	We recommend that, consistent with similar comments above, specific references to *replacement* and *removal* be included in INFR-Directive 1.7, as these are equally important activities. Alternatively, these activities could be replaced with a new defined term, *routine infrastructure activities*. It is unclear what *reasonable expansion* is or how it will be defined. Standards will need to be very clear on framing what is reasonable. This comment is also applicable to (b)(ii) – unreasonable constraints.

iii. areas to support the co-location of compatible infrastructure, including through infrastructure corridors b) land use plans must: i. protect the operation, maintenance, upgrading and reasonable expansion of infrastructure from the adverse effects of incompatible land uses, including reverse sensitivity and direct effects ii. require new sensitive activities to avoid or mitigate effects that could result in unreasonable constraints on infrastructure iii. use a range of planning tools and methods to protect infrastructure and support compatibility with other land uses, including: a. through buffers to separate incompatible land uses b. design and mitigation to improve compatibility iv. enable co-location of compatible infrastructure, including in infrastructure corridors.	INFR-Directive 1.7(a)(i) refers to protection from incompatible activities, while CC-Directive refers to land uses. Although some infrastructure can be incompatible with general land use, some infrastructure can be compatible with a land use but incompatible with activities associated with that land use. **Outcome sought:** INFR-Directive1.7 is amended to read throughout – *To protect existing or planned infrastructure and enable its ongoing operation, maintenance, **replacement**, **removal** and reasonable expansion:* Amend INFR-Directive 1.7(a)(i) to read - *infrastructure and areas where infrastructure needs to be protected from incompatible **land use and / or** activities*.

3.2 Sub-theme 2: Energy infrastructure

Secure, abundant and affordable energy system	
INFR-Directive 2.2: To maintain and improve energy security and resilience: a) land use plans and natural environment plans must enable all sources of energy to be developed and expanded, including thermal energy and emerging technologies b) natural environment plans must: i. recognise the national significance of existing hydro-generation schemes [five national hydro-generation schemes currently in NPS-FM] ii. protect the generation capacity and output of existing renewable energy assets when protecting, managing and allocating natural resources.	Because the policy refers to the defined term *renewable energy system*, we recommend expanding this sub-theme to capture all aspects of that system. Much of the existing NPS-REG, NPS-EN and NES-ENA could be reflected in this sub-theme to recognise the fundamental role the renewable energy system plays in a strong, productive and resilient economy. This would also reflect the system's specific requirements and the environments in which it must be located and operate. **Outcome sought:** INFR-Directive 2.2 (b)(i) is amended to read include reference to the wider renewable energy system – *recognise the national significance of the **renewable energy system**, including existing hydro-generation schemes [five national hydro-generation* *schemes currently in NPS-FM]*

Significantly increase renewable energy capacity	
INFR-Directive 2.4: To enable the renewable energy system to be significantly developed and expanded, land use plans and natural environment plans must: a) recognise and provide for the national, regional and local benefits of energy infrastructure b) provide for opportunities for new and expanded renewable energy generation capacity, regardless of whether these have been spatially identified in advance c) recognise and provide for renewable energy generation to have an operational or functional need to locate and operate where the renewable resource is located and available at a viable scale and quality to sustain the activity d) protect the capacity and output of the existing renewable energy generation assets and provide opportunities to increase the capacity of existing assets.	Because the policy refers to the defined term *renewable energy system*, we recommend that this directive be more clearly directed at the system as a whole. **Outcome sought:** INFR-Directive 2.4 (a) is amended to use the defined renewable energy system term - *recognise and provide for the national, regional and local benefits of* ***renewable*** *energy infrastructure.* (b) is amended to broaden the directive - *provide for opportunities for new and expanded renewable energy ~~generation~~* ***system*** *capacity, regardless of whether these have been spatially identified in advance.* (c) is amended to - *recognise and provide for* ***the*** *renewable energy* ***system's*** *~~generation~~ ~~to have an~~ operational or functional need to locate and operate in any environment including where the renewable resource is located and available at a viable scale and quality to sustain the activity.* (d) is amended to – ***the renewable energy system is provided opportunities to increase the capacity of existing assets and the output of existing renewable energy generation assets is protected.***

3.3 Sub-theme 3: Natural Hazards

Infrastructure's natural	
INFR-Directive 3.1: To recognise that infrastructure resilience is achieved through asset management, design, and investment planning, land use plans must not restrict infrastructure because of the effects of natural hazard risk to the infrastructure.	We agree that natural hazard resilience is best dealt with via infrastructure asset management and design, however we are concerned that the focus will shift to infrastructure exacerbating natural hazard risk and that without a qualifier, onerous assessment may be required for even minor routine activities. We are already seeing this play out in some district plan reviews.

	Outcome sought: Amend INFR-Directive 3.1 as follows: ***Recognise that infrastructure resilience is achieved through asset management, design and investment planning. Land use plans must not restrict infrastructure solely because it is exposed to natural hazard risk and must not impose disproportionate requirements on routine infrastructure activities that do not materially increase natural hazard risk.***

4. Theme 5: Public values

4.1 Sub-theme 2: Indigenous biodiversity

Identify and categorise indigenous biodiversity	
PV-Directive 2.1: To protect significant indigenous biodiversity and safeguard the life-supporting capacity of ecosystems, natural environment plans must: a) identify and map terrestrial indigenous biodiversity using a nationally consistent approach to set a baseline for establishing environmental limits and to assess whether the limit is met over time b) categorise identified indigenous biodiversity into 'tiers' that reflect ecological value and vulnerability, and which support proportionate protection, management and use, in accordance with national standards as follows: i. tier 1 – the most significant (valuable or vulnerable) indigenous biodiversity, includes areas that are intact, irreplaceable, or vulnerable, where adverse effects should be avoided or stringently managed if use and development is enabled ii. tier 2 – areas of valued indigenous biodiversity where some use and development can occur provided the management of effects is undertaken including offsetting and compensation iii. tier 3 – areas where use and development are enabled with full flexibility to manage effects as appropriate.	To avoid conflicts, we recommend that PV-Directive 2.1 include a requirement to map and consider existing infrastructure within these areas. This would ensure that lower-order standards and rules accurately consider effects within these areas and avoid repeating the approach under the RMA, where effects are consistently treated as new. **Outcome sought:** The 'nationally consistent approach' should include a requirement to capture infrastructure present when significant indigenous biodiversity is identified and mapped, and to reflect that infrastructure adequately in the tiered approach.

Use and development while protecting significant biodiversity and safeguarding life-supporting capacity Enhancement of indigenous biodiversity and ecosystems Enabling and managing use and development on identified Māori land	
PV-Directive 2.2 **PV-Directive 2.3** **PV-Directive 2.4** **PV-Directive 2.5** **PV-Directive 2.6** **PV-Directive 2.7**	**Outcome sought:** Conflicts between indigenous biodiversity and infrastructure should be managed in accordance with INFR-Directive 1.5.

4.2 Sub-theme 4: High natural character and outstanding natural features and landscapes

Identify high natural character areas, outstanding natural features and landscapes	
PV-Directive 4.1 To identify the values and characteristics of areas of high natural character within the coastal environment, wetlands, lakes and rivers and their margins and outstanding natural features and landscapes, land use plans must use the criteria and methods set out in national standards.	**Outcome sought:** The 'national standards' should also include a requirement to capture infrastructure present when identifying values and areas of high natural character and outstanding natural features and landscapes.

To protect from inappropriate development while allowing for appropriate development	
PV-Directive 4.2 To protect identified areas of high natural character and outstanding natural features and landscapes from inappropriate development, land use plans must: a) enable use and development where adverse effects on the identified values and characteristics are managed to acceptable levels [in accordance with national standards] b) avoid inappropriate development that will result in the irreversible loss of, or significant residual adverse effects on, the identified values and characteristics.	**Outcome sought:** Requiring existing infrastructure to be identified under PV-Directive 4.1 would assist the application of Directive 4.2 and help determine what is considered 'appropriate'. Any conflicts should be managed in accordance with INFR-Directive 1.5.

5. Interpretation

5.1 Definitions

Infrastructure	
Means: a) facilities used to process (including to refine) or store, and pipelines that distribute or transmit, natural or manufactured gas, petroleum, biofuel, or geothermal energy b) facilities used to generate electricity for supply, excluding any facility that a person uses primarily to generate electricity for their own use c) lines (and any associated facilities, including support structures for those lines) used or intended to be used to convey electricity, excluding any lines or associated facilities that a person uses primarily in connection with a facility to generate electricity for their own use d) facilities used to store electricity or other energy e) an aerodrome as defined in section 5 of the Civil Aviation Act 2023 f) a navigation installation as defined in section 5 of the Civil Aviation Act 2023 g) facilities for the loading or unloading of cargo or passengers carried by sea, including a port related commercial undertaking as defined in section 2(1) of the Port Companies Act 1988, and Northport (being the port at Marsden Point) h) a relevant school or an institution as defined in section 10 of the Education and Training Act 2020 i) an early childhood education and care centre as defined in section 10 of the Education and Training Act 2020, that is associated with and collocated with a relevant school or an institution (as those terms are defined in that section) j) facilities for an emergency service (such as an ambulance or a fire service) k) defence facilities operated by the New Zealand Defence Force to meet its obligations under the Defence Act 1990	**Outcome sought:** We recommend specific reference to *biogas* to ensure that, as this renewable energy source is developed further, the new system does not unnecessarily constrain its development and use. This term is absent from the Resource Management Act but is included in the Gas Act. *a) facilities used to process (including to refine) or store, and pipelines that distribute or transmit, natural or manufactured gas, petroleum, biofuel,* ***biogas,*** *or geothermal energy.*

l) a corrections prison as defined in section 3(1) of the Corrections Act 2004, and correction facilities operated by the Department of Corrections to meet its obligations under the Corrections Act 2004 m) resource recovery facilities or waste disposal facilities, including emergency facilities and privately operated facilities that are open to the public n) a network for the purpose of telecommunication as defined in section 5 of the Telecommunications Act 2001 o) a network for the purpose of radiocommunication as defined in section 2(1) of the Radiocommunications Act 1989 p) the distribution, or storage and distribution, of water for the purpose of supply (including for the purpose of irrigation) q) a drainage or sewerage system, including a stormwater network r) a road, railway line, cycleway, walkway, or similar facility (such as light rail, a busway, or a shared-use path) s) a health facility operated by Health New Zealand to meet its obligations under the Pae Ora (Healthy Futures) Act 2022 t) flood control and protection work carried out by, or on behalf, of a local authority.	

Operational envelope	
Means: the horizontal and vertical space occupied by the physical infrastructure along with the surrounding area necessary to undertake routine operation and maintenance activities, ancillary infrastructure activities and associated access, including previously disturbed areas.	**Outcome sought:** The current definition uses the undefined terms *routine operation and maintenance activities* and omits reference to replacement and removal activities. We recommend including a new definition of *routine infrastructure activities*, based on the NPS-EN definition of routine electricity network activities. **Operational** envelope means: *the horizontal and vertical space occupied by* ***or required to protect*** *the physical infrastructure along with the surrounding area necessary to undertake routine* ***infrastructure*** ~~*operation and maintenance*~~ *activities, ancillary infrastructure activities and associated access, including previously disturbed areas.*

6. About Powerco

Powerco is here to connect communities.

We're Aotearoa New Zealand's largest dual-energy distributor by network length, connecting more than one million people across the North Island to safe, reliable and resilient electricity and gas. From urban and rural homes and businesses to large-scale industrial operations, everything we do is driven by keeping our customers connected, now and into the future.

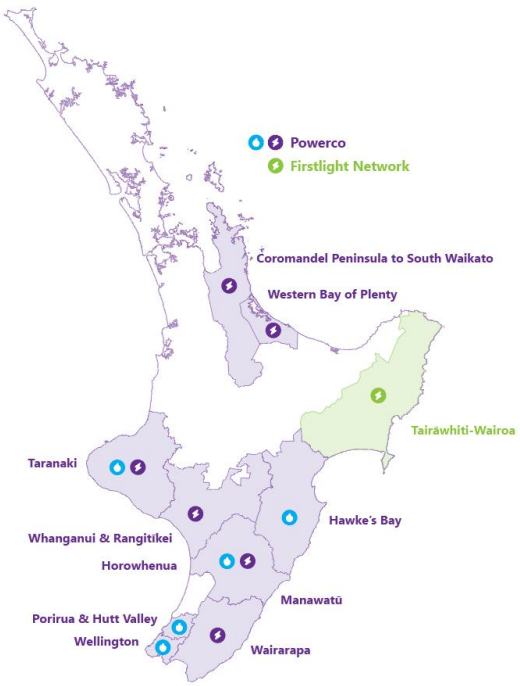
That's why we're committed to helping Aotearoa achieve net-zero emissions by 2050. Our role in enabling the sustainable energy transition is clear: to provide affordable, resilient and low-carbon energy through electrification, decarbonisation and future-ready networks.

We are ambitious for the future. We are Powerco.

Our networks span the upper and lower central North Island, serving approximately 1.1 million customers across 450,000 homes, businesses and industrial sites. They account for 46% of the country's gas connections and 16% of its electricity connections.

Our electricity distribution network extends more than 33,000 km, while our gas network covers over 6,170 km. This geographical reach means our infrastructure traverses a diverse range of environments—from urban and rural areas to Outstanding Natural Features and Landscapes, Significant Natural Areas, the coastal marine area, conservation land, wetlands and multiple planning zones.

Our Networks



Our place in the energy system

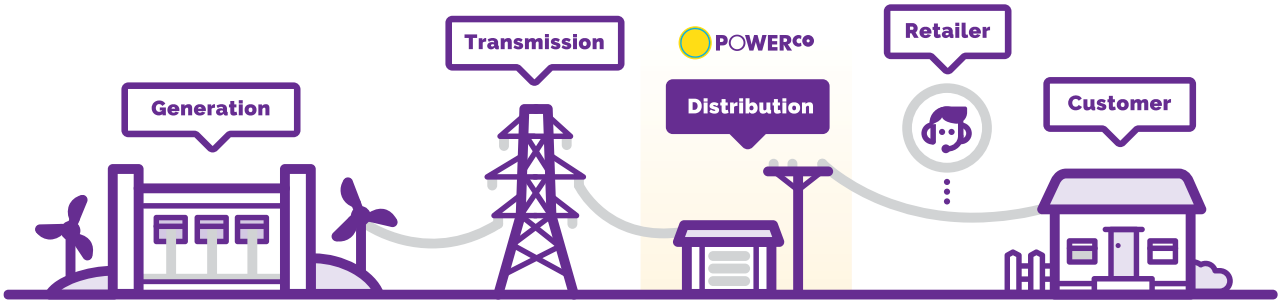


Figure 1 - The electricity system and the place of distribution

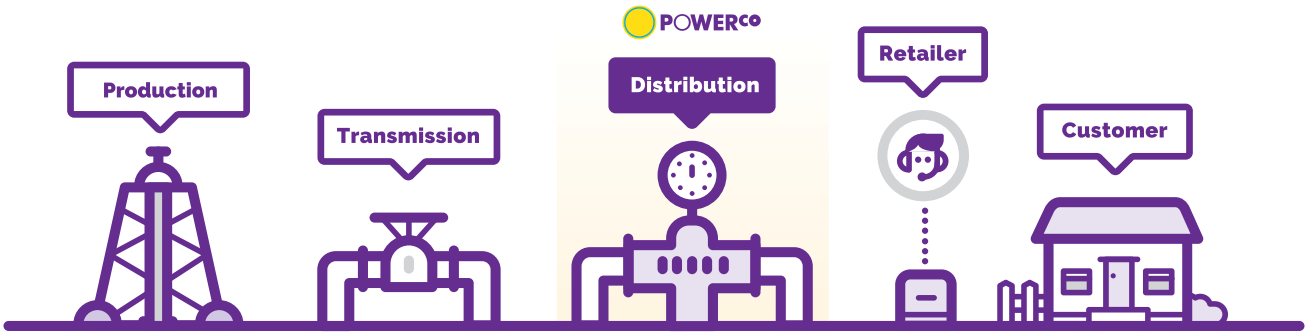


Figure 2 - The natural gas system and the place of distribution