

13 February 2026

Committee Secretariat  
Governance and Administration Select Committee  
Parliament Buildings Wellington  
Via Select Committee submission portal

Tēnā koe,

## A clear role for essential infrastructure providers

Powerco is one of Aotearoa's largest gas and electricity distributors, supplying around 363,000 electricity and 113,300 gas urban and rural homes and businesses in the North Island. These energy networks provide essential services to over 1 million kiwis. As a regulated electricity and gas distributor we are a lifeline utility and contribute to lifelines groups and local emergency management arrangements across the 29 districts and 6 regions our infrastructure crosses. We are also a contributing member of the National Lifelines Council. Further information about Powerco is provided in Attachment 2.

Our experience in emergency management highlights some key opportunities to improve New Zealand's emergency management system. We have provided comments and recommendations on the Bill in Attachment 1. A stronger focus on coordination underpins our recommended adjustments to the Bill:

### Improved coordination across agencies and utilities

- Improved coordination between local government and essential service providers is a critical enabler for community level emergency planning and response. This needs to be explicitly embedded in the Bill, particularly through regional plan processes
- Clearly defining roles and functions of key parties will minimise unnecessary effort and provide a clear structure for emergency management. Provisions in the Bill to ensure roles do not overlap, or duplicate functions under other regulation, is critical.
- Streamlining information sharing and data platforms will improve efficiency and accuracy in planning for, and responding to, emergencies. The Bill can more explicitly enable this, and it should be a priority for the development of Rules.

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, please contact Irene Clarke ([Irene.Clarke@powerco.co.nz](mailto:Irene.Clarke@powerco.co.nz)).

Nāku noa, nā,



**Emma Wilson**  
Head of Policy, Regulation and Markets  
**POWERCO**

## Attachment 1 – Comments and recommendations on Bill

### 1. Clarity of roles and responsibilities

Defining roles and obligations of key parties is essential to minimise unnecessary effort and provide a clear structure for directions, responsibilities and communications. Under the Bill, there is scope for confusion and duplication of roles, particularly between national and local direction and control during a state of national emergency. It is important to have one clear controller in an emergency. In our experience, it is most appropriate for the regional controller to have overarching control in any emergency (whether national or local). Similarly, if an emergency and a “transition period” overlap, it should be clear that the regional controller has overall responsibility. We recommend amending Clause 124 to clarify precedent of control when there are multiple controllers (or recovery managers) involved in a period of an emergency.

In addition to the above, we also support clarity in the powers of the Director General (clause 15). However, we recommend an amendment to clause 15 to ensure this ability to give directions or issue technical standards has appropriate checks instilled in the legislation which avoids conflict, duplication or disproportionate requirements being imposed. For example, distributors have complex works requirements to meet safety and reliability requirements, and without the understanding of that complexity there is a risk that a direction could conflict with duties under the Electricity (Safety) Regulations 2010 or other obligations, or even conflict with an infrastructure provider’s plan in place to manage continuity of service. A check on exercising powers is included for recovery managers in clause 158, and consideration of alternatives in other parts of the Bill (eg clause 211) and would be appropriately included into clause 15. This will ensure unnecessary administrative burden is avoided and directions take account of other infrastructure provider requirements and knowledge.

The membership, roles and functions of emergency management committees are clearly outlined in clause 24 and 27-30. We note that the relationship between the committee and essential infrastructure providers in the region is not clear in the Bill. This could be clarified in individual regional emergency management plans which may lead to inconsistency. There would be significant benefit in including this in the Bill to provide regional consistency and certainty for essential infrastructure providers. We recommend amending clause 24 to clarify that the Chair/lead of the regional essential infrastructure providers group (currently the lifelines group) is a member of the regional emergency management committee.

Regional lifelines groups have become a core part of the emergency management system. While there are expectations in the national emergency management plan for lifeline utilities to plan and communicate with other organisations, there is no direction in the Bill to endorse the critical role of the regional lifelines groups, or require essential infrastructure providers to participate in the regional group relevant for their services. While most regional lifelines groups operate effectively, there is not always full participation and this can be a barrier in emergency management outcomes. We recommend amending clause 91 to add an expectation that the regional emergency management plan would outline information about local essential infrastructure providers including about operation of a regional group as part of the local emergency management arrangements. An amendment to clause 74 should also confirm the expectation for essential infrastructure providers to participate in essential infrastructure regional coordination mechanisms.

There are a large number of named roles or positions with duties or powers in the Bill. We accept that this is necessary and generally accept the definition of the various roles. Clarity of these roles and implementation would be much improved if all definitions for all roles are contained in one part of the legislation. Currently the Bill defines roles throughout in each subpart across clauses 5, 107, 108, 121, 141, 158. For clarity of all parties, we recommend all definitions and interpretation clauses be moved to Part 1 of the Bill.

## **2. Essential infrastructure providers operate under multiple regulations**

We support essential infrastructure providers not having additional powers or obligations under emergency management legislation, but rather relying on powers and obligations under their existing operational regulations (as clarified by clause 12). Avoiding duplication or conflict is important as essential infrastructure providers already have clear obligations in ongoing delivery of services under legislation (and related regulations and codes) such as the Electricity Act, Gas Act, Commerce Act. The requirement for an essential infrastructure provider to develop a plan for its duty under this Act is an example of duplication. For example the National Gas Standard (AS/NZS 4645 referenced in the Gas (Safety and Measurement Regulations) covers emergency response planning, along with NZS7901, which provides criteria for safety management systems related to gas and electricity distribution.

Clause 74 of the Bill, as drafted, broadens the existing duties on lifeline utilities to “be able to function to the fullest possible extent” to now encompass “ensuring...the essential infrastructure...is able to function to the fullest extent during and after an emergency”. This shifts the duty from the functioning of the essential infrastructure provider (ie the business that owns/operates the infrastructure) to the functioning of the infrastructure itself. In our view the current Act is appropriate in its focus on the functioning and capability of the essential service provider, as the infrastructure itself is managed through other regulations (eg quality standards for electricity). We recommend an amendment to clause 74 to refocus it for the purpose of this Bill.

We generally support the definition of essential services and essential infrastructure providers (and the distinction between these). However, we recommend removing the reference to suppliers from the list of infrastructure components. The functioning of organisations that provide for example, equipment or technical services to us, is less relevant in an emergency, and not a component which an essential infrastructure provider has control in the case of an emergency.

Robust regional emergency planning is at the core of our emergency management system. We comment on the role of emergency management committees in section 1 above and on the contents of regional plans in section 3 below. It is our view that regional essential infrastructure provider groups should have a mandated connection with emergency management committees to ensure coordinated emergency planning and response. We recommend amending clause 74 to be clearer on the relationship between essential infrastructure providers and emergency management committees, and expectation that essential infrastructure providers will participate in the regional group for planning and coordination purposes.

Clause 210 provides a regulation making power that enables regulations that prescribe matters an essential infrastructure provider must address in its plan. The clause requires that before the Minister makes regulations, the Minister must consult persons and organisations as the Minister thinks appropriate and must have regard to obligations on the essential infrastructure provider placed under other legislation that require continuity of service.

Under clause 211 the Minister must also consider alternatives, benefits, and costs before making regulations. While we acknowledge the checks embedded in these clauses to avoid duplication, we do not see any requirement for regulations under emergency management legislation to prescribe plans already managed under other legislation. There is too much opportunity for confusion, conflicting objectives and administrative burden and costs imposed for no benefit to community outcomes in delivery of services. We recommend the option of regulations prescribing an essential services provider's plan for continuity of service (including in emergencies) should be removed from clause 210.

We acknowledge that schedule 3 lists the essential infrastructure providers and relates to core infrastructure services, rather than broader essential services that were being considered for inclusion in previous consultation. While we support a clear focus on core essential infrastructure, it is our view that schedule 3 should also include managed information technology services and internet service providers. These are now core services with, or connected to, multiple infrastructure services, and critical to functioning of essential infrastructure. Further, we note that scientific hazard/warning infrastructure has now advanced to underpin public safety and security as well as emergency management planning and we also recommend that this be included as essential infrastructure.

### **3. Robust regional emergency management planning**

Regional emergency management plans will be the core driver of planning for, and reacting to, emergencies. There is significant experience in the development of plans, and their operationalisation, to inform the direction needed in the Bill and in subsequent standards or rules.

Clause 91 sets our important contents for regional plans. This includes the hazards and risks to be managed, and emergency management for those hazards and risks. Consistent with the purpose of the Bill "encouraging and enabling communities to achieve acceptable levels of risk", it is important for each region to be transparent about the level of risk or hazard that the region has agreed to manage to. In developing the plan, each region will assess this and determine the relevance of local hazards/risks and expectations in responding to emergencies related to those hazards/risks. Working across 29 districts and six regions, we are aware of significant differences in approach to identifying and prioritising hazards. We recommend that clause 91 be adjusted to ensure the plan sets out the emergency management necessary to manage hazards and risks to the level the committee has determined is appropriate for that region. This should be based on a documented, and as far as possible nationally consistent approach, to risk identification and categorisation. We consider it appropriate for the Bill to set this requirement at a regional level, enabling regional planning, not at the level of individual infrastructure service plans.

There are additional items which could have regional nuances and need to be addressed in regional plans to ensure all organisations with a role in successful emergency management are fully engaged and clear. For example, arrangements for coordination between local authorities and essential infrastructure providers within a region should be clarified in the regional plan. Clause 91 as drafted requires arrangements for coordination with other regions to be addressed, but not arrangements within regions. We recommend clause 91 explicitly require that regional plans include arrangements for cooperation and coordination within the region. We comment further on coordination in section 4 below.

Another matter critical for robust emergency management is mechanisms for information sharing. We recommend clause 91 explicitly require that regional plans include arrangements for coordination and sharing of information. We comment further on information sharing in section 5 below.

We support the requirement in clause 74 for essential infrastructure providers to participate in the development of regional plans. There is no direction in the Bill for what this may involve. Clause 94 identifies particular parties to be engaged in development of the regional plan, and clause 95 identifies parties to be notified of a proposed plan and opportunity for submissions. Neither of these clauses refers to essential infrastructure providers. We assume that essential infrastructure providers will be engaged during the plan preparation or review process. As a minimum, we recommend that essential infrastructure providers be included in clause 95(1)(a) to be given formal notification.

We support clause 81 which requires the emergency management committee (or Minister) to consider alternatives, benefits and costs before approving plan provisions that impose requirements on a person (other than the committee, local authority or emergency services). This includes considering other regulations which may have provisions to achieve the Act. This is appropriate in the case of essential infrastructure providers to ensure that requirements in other legislation to provide infrastructure services, share information, or incentives to deliver a quality of service are the primary driver, not duplicated in the emergency management legislation or plans. There is no indication on how the committee or Minister would evaluate the costs/benefits/alternatives or how they would demonstrate or document they have done this. This would be a useful topic for national rules under the new Act, or guidance to set out how these assessments are undertaken, or relevant factors to be considered in the assessment.

We note that clause 100 empowers the Minister to issue regional planning standards prescribing requirements relating to the structure, format, or content of regional plans. We support this option to encourage a level of consistency across regions. In the process of preparing regional standards, essential infrastructure providers are affected more than the public generally, and should be explicitly engaged in the preparation process, as appropriate. For example, there could be some regional planning standards that relate particularly to plan contents for essential infrastructure providers roles or processes. We recommend clause 101 be adjusted to require that the Minister also considers essential infrastructure providers, as well as the public, local authorities, and Emergency Management Committees, in establishing a process that gives adequate time and opportunity to make a submission on the draft. We strongly recommend prioritising the development of standards on the approach to risk identification and categorisation to support consistency, as appropriate, to defining hazards across different regions.

We support the inclusion of an offence in clause 179 if a person intentionally fails to comply with a requirement in an emergency management plan. All 'persons' with a role in preparing for, or responding to emergencies, must be held to account for that role.

#### **4. Mechanisms for coordination across sectors**

A purpose of the Act (Clause 3) is "encouraging the co-ordination of emergency management, planning, and related activities among the wide range of agencies and organisations preventing or managing emergencies under this Act and the relevant legislation listed in Schedule 2". We are concerned that the Bill does not contain clear mechanisms or requirements that would provide this coordination. Further, Schedule 2 does not include relevant legislation that

essential infrastructure providers operate under, and the role of infrastructure organisations in achieving this purpose is therefore unclear. We recommend Schedule 2 is amended, and mechanisms for coordination are embedded into national and regional plans, and that rules (clause 212) are used to direct mechanisms for this coordination purpose.

Rules can be used to prescribe operating practices, procedures, and systems, organisational arrangements (clauses 212). This could be for practices and arrangements for coordination, and we support this provision in conjunction with regional plans confirming arrangements for coordination and cooperation. Similar to the Minister's considerations in making regulations, we recommend clause 213 be amended to confirm that the Minister will consider alternatives, benefits, costs and appropriateness before deciding to proceed with a rule.

We are concerned that sector response plans (clause 104-105) may be seen as a mechanism for coordination. We see more issues and costs than benefits with sector response plans. A sector response plan is focused on one sector. The need for coordination is between sectors, not within sectors. A sector response plan would likely duplicate other planning/operation mechanisms, and in creating expectations focused on one sector, create less coordination with other sectors, plans or committees. Should there be a case for a sector plan in a particular sector where there are not existing planning/operation frameworks, then the Bill needs to limit this tool to the sector(s) where it may be used. Overall, as the purpose or need of sector plans is not clear, we recommend these provisions (clause 104-105) be removed from the Bill. It would be more efficient and effective for essential infrastructure providers to put effort into regional plans rather than contributing to sector plans (noting essential infrastructure providers may need to contribute to multiple sector plans due to connections and reliabilities between sectors). Should these clauses remain, as a minimum clause 104 must be amended to include a consideration for matters addressed in other regulation (similar to clause 81) to avoid duplication.

Most current regional CDEM groups have protocols or informal arrangements for regional coordination. The national emergency management plan sets expectations for lifeline utilities to plan with local authorities, CDEM groups and other lifeline utilities and establish procedures for communications. This coordination plays out at a regional level. Unfortunately, the Bill does not incorporate these mechanisms for coordination in the membership/operation of emergency management committees, activities of essential infrastructure providers or contents of regional plans. We have commented on these matters in sections 1 and 3 above and recommended amendments to improve the Bill, which could assist in achieving the coordination purpose of the Bill.

## **5. Streamlining data and information sharing**

The Bill provides no direction or certainty in arrangements for streamlining information requirements or sharing of information. A framework for sharing of data and information in a streamlined and efficient way is a critical enabler in both planning for, and responding to, emergencies.

There is considerable opportunity for streamlining common information requests and reporting during emergencies. The information powers (clause 170–173) provide for the Director-General, committees and controllers to require information, but this is one-way and event-driven. In requesting information, there is no consideration of multiple, duplicative, unnecessary or overlapping requests. This is something that we have experienced in emergency events causing significant distraction of resources for no clear outcome. In our view, clause 170 should

be amended to ensure consolidated information requests, preferably using one request channel during an emergency event.

In both planning for, and responding to emergencies, a framework is required to ensure compatible data platforms to seamlessly share and update information. Technology has advanced considerably and opportunities with shared viewing platforms, automation and other data tools must be used for the advantages and efficiencies in local planning, coordination and response.

We have recommended in section 3 that clause 91 be amended to ensure that regional plans outline information and data sharing arrangements for that region.

Clause 212 authorises the Minister to make rules for specified purposes, including for prescribing forms, technical and data standards, and reporting requirements. We support development of rules to specify the form of information (including reports) shared during emergencies, and frameworks to be used for data and information sharing in both planning and response. This could build on existing good practice examples and systems. While this is not a matter for the content of the Bill, in our view this is a key priority in achieving the purpose of the Bill and we seek the Select Committee's endorsement for this to be progressed as soon as possible.

## 6. Recommended amendments to Bill

Clause	Powerco recommendation
CI 5	<b>Move all interpretation clauses</b> defining roles or other matters of interpretation into clause 5 or a new clause after clause 6.
CI 7	<p><b>7 Meanings of essential infrastructure and essential infrastructure provider</b></p> <p>...</p> <p>(2) In this section, -</p> <p>...</p> <p><b>infrastructure components</b> means assets, information, networks, systems, <del>suppliers</del>, people, and processes.</p>
CI 15	<p><b>15 Powers of Director-General</b></p> <p>...</p> <p><u>(5) The Director-General may exercise the powers in (3) to (4) if the exercise of the powers is, in the opinion of the Director General:</u></p> <p><u>(i) in the public Interest; and</u></p> <p><u>(ii) necessary or desirable to ensure a timely and effective recovery; and</u></p> <p><u>(iii) the most appropriate means to achieve the purpose, having regard to the efficiency and effectiveness of a direction relative to other means; and</u></p> <p><u>(iv) proportionate in the circumstances</u></p>
CI 24 and equivalent amendment to cl 25 and 26	<p><b>24 Members of Emergency Management Committees</b></p> <p>(1) Each local authority must be a member of an Emergency Management Committee, unless it is a unitary authority that is a unitary authority Emergency Management Committee (see <b>section 25(5)</b>).</p> <p>...</p> <p><u>(6) The chair or designated lead of the regional essential infrastructure providers group for the area may be a member of the Emergency Management Committee for that area.</u></p>
CI 74	<p><b>74 Duties of essential infrastructure providers</b></p> <p>An essential infrastructure provider must—</p> <p>(a) ensure that the essential infrastructure <del>provider that it is responsible for providing</del> is able to function to the fullest possible extent, even though this may be at a reduced level, during and after an emergency:</p> <p>...</p> <p><u>(f) participate in the essential infrastructure provider group for the area</u></p> <p><del>(g)</del> provide, free of charge, any technical advice to the Director-General or any Emergency Management Committee that is reasonably required by the Director-General or that Committee:</p>

Clause	Powerco recommendation
CI 91	<p><b>91 Content of regional emergency management plan</b></p> <p>(1) Each Emergency Management Committee’s regional emergency management plan must state and provide for—</p> <p>(a) the local authorities that have united to establish and maintain the Committee;</p> <p>(b) the hazards and risks, <u>and the level of those hazards and risks</u>, to be managed by the Committee <u>including:</u></p> <p><u>(i) the methodologies and assumptions used to determine that level of risk; and</u></p> <p><u>(ii) the approach to risk tolerances, standards or levels of service for emergency management purposes:</u></p> <p>...</p> <p><u>(o) the arrangements for co-operation and co-ordination of local authorities and essential infrastructure providers;</u></p> <p><u>(p) the arrangements for the timely and secure sharing of information relevant to emergency management between the Committee, essential infrastructure providers, controllers, local authorities and other relevant agencies.</u></p>
CI 95 (1)(a)	<p><b>95 Public notification for proposal for regional emergency management plan</b></p> <p>(1) The Emergency Management Committee must—</p> <p>(a) give notification of the proposal—</p> <p>(i) by public notification (within the meaning of section 13 of the Legislation Act 2019); and</p> <p>(ii) to representatives of iwi and Māori within the Committee’s area; and</p> <p><u>(iii) to essential infrastructure providers in the Committee’s area; and</u></p> <p><del>(iii)</del><u>(iv)</u> to any other specific person or group that the Committee considers appropriate; and</p>
CI 101	<p><b>101 Preparation of regional emergency management planning standards</b></p> <p>....</p> <p>(2) Before issuing a regional emergency management planning standard, the Minister must—</p> <p>(a) consult the Director-General; and</p> <p>(b) prepare a draft of the standard; and</p> <p>(c) give public notice of the draft; and</p> <p>(d) establish a process that the Minister considers gives the public, local authorities, <u>essential infrastructure providers</u>, and Emergency Management Committees adequate time and opportunity to make a submission on the draft.</p>
CI 104	<p><b>104 Director-General may develop sector response plans for essential infrastructure providers</b></p> <p>....</p> <p><u>(4) Before deciding to prepare or approve a sector response plan, the Director-General must</u></p> <p><u>(a) have regard to -</u></p> <p><u>(i) the extent, if any, to which the provisions are necessary to achieve the purpose of this Act; and</u></p> <p><u>(ii) other means in addition to or in place of the provisions that, under this Act or any other legislation, may be used in achieving the purpose of this Act; and</u></p> <p><u>(iii) the reasons for and against preparing or approving the proposed provisions and the principal alternative means available, or of taking no action; and</u></p> <p><u>(b) be satisfied that the provisions are the most appropriate means to achieve the purpose of this Act relative to other means.</u></p>

Clause	Powerco recommendation
CI 124	<p><b>124 When authorised Controllers or specified persons may exercise powers</b></p> <p><u>(1)</u> An authorised Controller or a specified person may exercise the powers conferred on them by sections 127 to 135 only in respect of a location for which the person is responsible.</p> <p><u>(2)</u> <u>In situations where both the Director-General and the authorised controller have powers at the same time, the authorised controller's powers take precedence.</u></p> <p><u>(3)</u> <u>In situations referred to in (2) the authorised controller must:</u></p> <p style="padding-left: 20px;"><u>(a) consider the role of the Director-General; and</u></p> <p style="padding-left: 20px;"><u>(b) co-ordinate in the exercise of powers.</u></p>
CI 170	<p><b>170 Power to require information</b></p> <p>....</p> <p>(2) A person to whom or a Committee to which this section applies (a <b>designated person or Committee</b>) may, by notice in writing, require any person to give them or it information that is,</p> <p>—</p> <p>...</p> <p style="padding-left: 20px;">(c) capable of being provided without unreasonable difficulty or expense; <u>and</u></p> <p style="padding-left: 20px;"><u>(d) proportionate to the purposes of the requirement; and</u></p> <p style="padding-left: 20px;"><u>(e) not already requested by another designated person; and</u></p> <p><u>(3) designated persons and Committees must, to the extent that is reasonably practicable -</u></p> <p style="padding-left: 20px;"><u>(a) consolidate notices requiring information during an emergency; and</u></p> <p style="padding-left: 20px;"><u>(b) use one nominated communication point for information requests and responses;</u></p> <p><del>(3)</del><u>(4)</u> The person may appeal to the District Court under <b>section 207(1)(b)</b>.</p>
CI 210	<p><b>210 Regulations</b></p> <p>(1) The Governor-General may, by Order in Council made on the recommendation of the Minister, make regulations for all or any of the following purposes:</p> <p>...</p> <p style="padding-left: 20px;"><del>(c) prescribing matters that an essential infrastructure provider, or a class of essential infrastructure providers, must address in a plan developed in accordance with <b>section 74(b)</b>;</del></p>
CI 213	<p><b>213 Procedure for making rules</b></p> <p>(1) Before making a rule under this section, the Minister must—</p> <p>.....</p> <p style="padding-left: 20px;">(d) have regard to the following matters:</p> <p style="padding-left: 40px;">(i) the purpose of this Act:</p> <p style="padding-left: 40px;">(ii) the costs, <u>benefits, and alternatives</u> of implementing measures for which the rule is being proposed:</p> <p style="padding-left: 40px;">(iii) any other matters that the Minister considers appropriate in the circumstances.</p>
Schedule 2 additions	<p><u>Electricity Act 1992</u></p> <p><u>Gas Act 1992</u></p> <p><u>Commerce Act 1986</u></p>
Schedule 3	<p><del>Public telecommunications</del> <u>Communication</u> services</p> <p>3 An entity that provides a public telecommunications network (within the meaning of the Telecommunications Act 2001)</p> <p><u>4 An entity that provides public internet services or managed information technology services</u></p> <p><u>5 An entity that provides scientific hazard warning services</u></p>

## Attachment 2 – Information about Powerco and our network

### Providing an essential service

We bring electricity and gas to over 1 million kiwis across the North Island. We're one part of the energy supply chain. We own and maintain the local lines, cables and pipes that deliver energy to the people and businesses who use it. Our networks extend across the North Island, serving urban and rural homes, businesses, and major industrial and commercial sites. We are also a lifeline utility. This means that we have a duty to maintain operations 24/7, including in the case of a major event like an earthquake or a flood.

The cost of operating our business is not dependent on the amount of gas or electricity we distribute in our networks. These costs reflect the need to maintain the safe operation of the network and are mostly driven by compliance with safety regulations. This includes replacing assets when they reach their end of life. Additional costs to grow the size or the capacity of the network are often met by customers requiring the upgrade or new connection.

Under Part 4 of the Commerce Act, Powerco's revenue and expenditure are set by the Commerce Commission as part of monopoly regulation. We are also subject to significant information disclosure requirements, publicly publishing our investment plans, technical and financial performance, and prices. The regulatory regime allows us to recover the value of our asset base using a regulated cost of capital (WACC) set by the Commission, and a forecast of our expenditure. Every five years, the Commission reviews its forecasts and resets our allowable revenue. This process is designed to ensure the costs paid by customers for us to manage and operate our network is efficient given we are a monopoly and an essential service.

### Our electricity customers

Powerco is New Zealand's largest electricity utility by the area we serve. Our electricity networks are in Western Bay of Plenty, Thames, Coromandel, Eastern and Southern Waikato, Taranaki, Whanganui, Rangitikei, Manawatu and Wairarapa. We have over 29,000 km of electricity lines and cables connecting around 363,000 homes and businesses. Our place in the electricity sector is illustrated below.

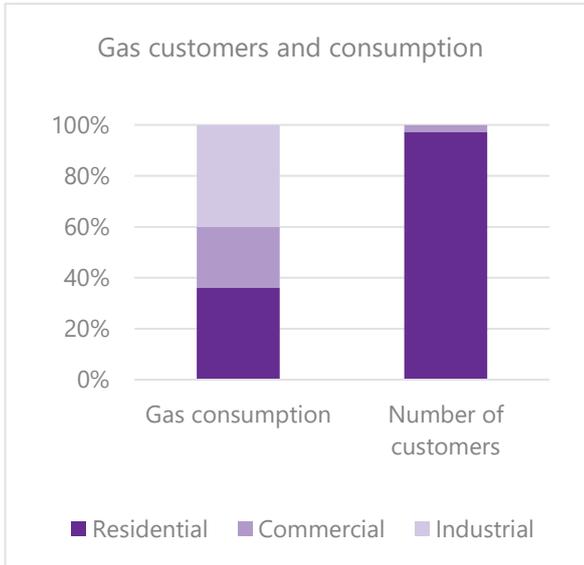


Our network contains a range of urban and rural areas, although is predominantly rural. Geographic, demographic, and load characteristics vary significantly across our supply area. Our development as a utility included several mergers and acquisitions that have led to a wide range of legacy asset types and architecture across the network.

Powerco is one of 29 electricity distribution companies. Our customers represent around 13% of electricity consumption (similar in magnitude to the Tiwai aluminium smelter) and around 14% of system demand. Powerco's

network is almost three times the size of Transpower’s in terms of circuit length. The peak demand on our combined networks (2025) was 940 MW, with an energy throughput of 5,297 GWh.

### Our gas customers



Powerco is New Zealand’s largest gas distribution utility. Our gas pipeline networks are in Taranaki, Hutt Valley, Porirua, Wellington, Horowhenua, Manawatu and Hawke’s Bay. We have over 6,200 km of gas pipes connecting to around 113,300 homes and businesses. Our customers consume around 8 PJ of gas per year.

Our industrial customers are less than 1% of our customer base and consumer approx. 40% of gas on our network. Our residential customers are 97% of our customer base and consume approx. 35% of gas on our network. The remaining 25% of gas is consumed by our commercial customers.

Around 30% of our larger customers are in the food processing sector, around 20% in the manufacturing sector and around 10% in the healthcare sector.

### Our network footprint

Our network represents 46% of the gas connections and 16% of the electricity connections in New Zealand. We operate assets within six regions and across 29 district or city council areas.

