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Via email: [levelplayingfield@ea.govt.nz](mailto:levelplayingfield@ea.govt.nz)

7 May 2025

Dear Rob

### **Level Playing Field Measures**

The Northern Infrastructure Forum (NIF) welcomes the opportunity to provide feedback on the Level Playing Field Measures, as set out in the Electricity Authority's (EA) Options Paper.

The NIF is a policy and advocacy organisation formed to help raise the standard of infrastructure planning and decision-making across the Upper North Island, and maximise the contribution that infrastructure can make to productivity and living standards.

Though the focus of our work has traditionally been on transport infrastructure, we have since late 2024 been closely involved in energy issues, uniting with the Auckland Business Chamber to lead a campaign calling for urgent policy action to help drive more stable, more affordable energy prices over the long term. A number of players from the independent part of the energy sector – generators, retailers, suppliers and users – have signed up to this campaign.

We strongly support the EA's commitment to addressing the lack of competition in the energy sector, and the urgency it has brought to the task. We support the proposal to implement non-discriminatory obligations immediately, supported by an escalation framework. However, the prevailing view among the members of our campaign is that the Government's response must not end there – the measures do not get to the heart of the matter, and will have only limited impact unless supported by action in other areas.

In particular, we submit that steps to separate the generation and retail functions of the gentailers also need to be considered, not just corporate or operational separation (as raised in the Options Paper) but full structural separation. Specifically, we would like to see a review of the costs and benefits of separation, and an implementation plan. This must take place as soon as practicable.

As noted during our 4 April meeting with you, Anna Kominik and Sarah Gillies, we would appreciate the chance to bring together a selection of our members to meet with you again and provide more detailed feedback on EA's work programme.

Yours sincerely,



Barney Irvine  
**Executive Director, Northern Infrastructure Forum**