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16 December 2025

Submissions  
Electricity Authority

Nova Energy Limited  
PO Box 3141, Wellington 6140

By email: [appropriations@ea.govt.nz](mailto:appropriations@ea.govt.nz)

Re: Nova submission on Electricity Authority 2026/27 Levy-funded Appropriations consultation

Nova Energy (Nova) appreciates the opportunity to comment on the above-mentioned consultation from the Electricity Authority (the authority).

Nova broadly supports the Electricity Retailers' and Generators' Association of New Zealand (ERGANZ) submission and overall agrees with the concerns and recommendations set out in that submission.

Nova supports the Authority's proposal to limit levy increases for 2026/27 and acknowledges the intention to absorb a material share of internal cost pressures. Maintaining restraint in levy growth is important in the current cost-of-living environment.

At the same time, Nova is concerned about the cumulative impact of an expanding regulatory and monitoring work programme. For smaller participants, even incremental increases in levy-funded activity can have a disproportionate effect, diverting limited resources away from customer-facing activity and innovation toward compliance.

Consistent with ERGANZ's submission, Nova considers it important that levy-funded initiatives are clearly evidence-based, proportionate, and tightly linked to demonstrable consumer benefits.

Nova also supports ERGANZ's comments regarding the increasing scale and granularity of consumer data being collected by the Authority, and the importance of clear justification, transparency, and appropriate safeguards to maintain consumer trust.

Overall, Nova encourages the Authority to continue exercising discipline in levy setting and to ensure levy-funded activity remains focused on areas of clear consumer benefit and material system risk.

Yours sincerely

Tamiris Robinson

Regulatory Advisor

Question	Comment
Q1. Do you agree with the proposed approach to the Authority's Electricity Industry Governance and Market Operations appropriation?	Yes
Q2. Do you have any feedback on the Authority's work programme for 2026/27?	<p>Nova supports the Authority's objectives but considers it important that the 2026/27 work programme remains clearly evidence-based, proportionate, and focused on demonstrable consumer benefits. Nova is concerned about the cumulative impact of an expanding regulatory and monitoring programme, which can disproportionately affect smaller participants by diverting limited resources toward compliance rather than customer-facing activity and innovation.</p> <p>Consistent with ERGANZ's submission, Nova encourages the Authority to prioritise targeted interventions and to exercise restraint in committing significant resources to initiatives where key policy settings remain unresolved or evidence of material consumer harm is limited.</p>
Q3. Do you agree with the proposed approach to the Authority's Managing the Security of New Zealand's Electricity Supply appropriation?	Yes
Q4. Do you agree with the proposed approach to the Authority's Electricity Litigation Fund appropriation?	Yes