

Tēnā koe Sarah,

Thank you for your joint letter outlining the role of non-network solutions (NNS) in supporting efficient electricity network investment.

Buller Electricity Ltd (BEL) supports the overarching objective of ensuring consumers benefit from least-cost, future-ready network development. We acknowledge the increasing importance of flexibility, distributed energy resources, and demand-side participation in managing network constraints and facilitating the energy transition.

From BEL's perspective, we agree that NNS should be considered alongside traditional network solutions as part of standard planning processes, supported by robust and transparent cost-benefit analysis. We note that this aligns with existing AMP requirements and the current price-quality regulatory framework, which is technology-neutral and incentivises efficient outcomes regardless of delivery mechanism.

We also recognize the potential role of pricing reform as an enabler of flexibility. However, in smaller and more regionally constrained networks such as ours, the practical realization of price-responsive demand remains uncertain in the near term. Consumer engagement, retailer capability, and the maturity of enabling technologies will be critical factors influencing uptake. Careful management of transition risks—including unintended peak creation and impacts on existing controlled load arrangements—will be important.

BEL supports efforts to improve coordination and standardization of procurement approaches for flexibility services. Given the current immaturity of the NNS market in New Zealand, reducing complexity and transaction costs for providers will be essential to encourage participation and enable scalable solutions.

We also consider it important that regulatory settings continue to recognize the operational realities of smaller distributors. While NNS may offer material benefits in certain contexts, there will remain circumstances where traditional network investment is the most efficient and reliable option. Maintaining flexibility within the regulatory framework to accommodate these differences is critical.

Overall, BEL is supportive of the direction outlined in the letter and welcomes ongoing engagement with the Commission, Authority, and EECA as this work progresses. We are particularly interested in further guidance on evaluation methodologies, practical case studies within New Zealand, and how regulatory expectations may evolve ahead of DPP5.

Please feel free to contact us if you would like to discuss our views in more detail.

Ngā mihi,

Craig Scanlon – Chief Executive

Buller Electricity Limited