July 27th 2026

Electricity Authority - Te Mana Hiko
Te Whanganui-a-Tara Wellington
Via email: fsr@ea.govt.nz

Kia ora EA team,

Thank you for the opportunity to provide further feedback on the Electricity Authority's Roadmap for the Future of Distribution System Operation in New Zealand. I am pleased that the proposal for a future DSO recognises community organisations as potential participants alongside distributors, retailers, and aggregators. This is a positive signal; however, the roadmap estimates that community organisations might not be actively involved until 2030. This timeline is too slow. I recommend shifting the approach from treating community involvement as an "exploratory" future possibility to making it a foundational requirement of the new energy architecture, starting now.

There is already thought leadership and alignment on this from other community-centred groups such as 350 Aotearoa, whose 'Our power, our future' Energy Strategy Report elevates community-owned energy. Equally, there are already community groups working on energy with enthusiasm and willingness to participate. One of them is the Lyttelton Energy Transition Society in Ōtautahi Christchurch, where I am a committee member and volunteer. There are also multiple Rewiring Aotearoa Communities across the country; these are community groups advocating for solar and electrification, demonstrating that New Zealanders are interested in being active participants—not just consumers, but prosumers—in the electricity system.

To be prepared for full participation, community groups would need regulatory standing, further education, and funding or partnership support. I recommend that a specific part of the Roadmap focus on building these foundations. More specifically:

- The roadmap should immediately prioritise supportive policies and accessible funding criteria to enable every region to develop a fit-for-purpose community energy strategy.
- The Authority should develop electricity regulatory arrangements that allow community-owned or community-operated energy assets to participate in three functions: network operations, market participation, and planning. This means these community resources can be active traders or participants, whether independently, peer-to-peer, or through regional energy hubs.
- The Authority should ensure regulatory steps and settings recognise community energy as a visible player to provide flexibility, resilience, and network support services. This includes ensuring the "Registry of installation control points" is

upgraded to provide full visibility of the location and functionality of community-owned resources.

- The Authority, alongside other agencies, should support further demonstration projects for community-owned or operated microgrids, batteries, neighbourhood microgrids, and community flexibility aggregators.
- Finally, it is important to include equity measures and considerations in regulations, policies, and funding mechanisms. Community energy has the potential to share benefits across community members, as not everyone is in a position to access distributed generation, electrification, or solar options. Guarantee and risk mitigation schemes may be needed for small community organisations or areas of greater need. Equally, reserve funds or equity funds could be created where profits from community-owned energy can be shared with residents who have not yet accessed solar and are experiencing energy hardship.

Thank you for your attention to these matters.
Ngā mihi nui,

Margarita Parra