



4 Hune 2025

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

### **Te Korowai o Ngāruahine Trusts Submission on the Decentralisation green paper**

1. Ko te Tarati o Te Korowai o Ngāruahine, (arā, ko Te Korowai) te Rōpū Mana Whakahaere mō Ngāruahine iwi nō muri Whakataunga Take Tiriti. Kei a Te Korowai te haepapa mō te whakahaere me te whakatipu i ngā rawa whakataunga take Tiriti a Ngāruahine – hei painga mō ngā uri o Ngāruahine. Kei a Te Korowai te haepapa ki te whakapātari i ngā kuapapa here ka tukituki pea ki ngā hiahia o Ngāruahine.
1. Mō ngā Whakataunga Take Tiriti, ka hora te rohe o Ngāruahine, mai i Manga Taungatara kei te pito whakateraki rawa, ki Manga Waihi kei te pito whakatetonga rawa. Tae ana te rohe hoki ki Te Papa-Kura-o-Taranaki otirā ko te tupuna, Koro Taranaki (Taranaki Maunga)
2. Kāore a Te Korowai i te honohono ki ngā kaupapa tōrangapū, ā, ka mahi ngātahi me te kāwanatanga ahakoa ko wai ki te whakaahu whakamua i ngā whāinga me ngā hiahia o Ngāruahine. Waihoki, kei a Te Korowai te haepapa ki te whakapātari i ngā kuapapa here ka tukituki pea ki ngā hiahia o Ngāruahine.

### **Question One – Do you agree with the description of decentralisation? If not, why not?**

3. We agree that DER's are a key component for decentralisation and that digitisation will be important for consumer choice. However, we point out that decentralisation and the transition to renewables are both vulnerable to climate change denial and delay.
4. There is no effective competition in the electricity market so the big gen-tailers can adapt their generation and retail operations to insulate themselves from competition.
5. What is needed is a revolution of the way we think about energy and how the government incentivises change. This is unlikely to occur while they are still the majority shareholder of the current rentier gen-tailers.

6. Consumers should be the primary beneficiaries of a decentralised energy system. Centralised generators and retailers/gen-tailers should no longer monopolise electricity production and trading.
7. We would like to see homes and communities as traders of excess electricity which would require them having the ability to both draw from the grid when needed and direct electricity they have generated into the grid when they wish. Battery storage and technology such as VEN could allow them to buy electricity when it is cheap and sell it when the price is high.
8. DER's using micro-hydro, run of river generation is problematic for hapū and iwi. The main issues are:
  - the question of freshwater ownership which is currently based on Crown assumptions;
  - the privileging of landowners with exclusive rights in the absence of clear regional plan rules;
  - the unknown cumulative and incremental impacts on rivers and streams.
9. Effectively, the only technology that decentralisation would apply to is solar generation and battery storage. We urge meaningful and comprehensive consultation with iwi and hapū before consideration of run of river generation methods as viable options for a decentralised electricity system.

**Question Two - Do you agree with the articulation of the potential outcomes and benefits from decentralisation for consumers? If not, why not?**

10. The recent Commerce Commission decision to increase revenue limits for Transpower and local lines companies is the opposite of what needs to happen in the electricity sector. This extra revenue will be used to support investment in maintaining the network and network growth.
11. We expect energy sovereignty to be a key outcome of decentralisation. This involves reduced dependency on gen-tailers who extract massive profits from consumers while failing to invest in network upgrades and expansion.
12. Some suggested benefits, such as accelerated decarbonisation and electrification are dependent on non-existent government incentives. Others such as equitable access to low-cost electricity assume that electricity cannot be free to the most vulnerable in our communities.

**Question Three - Do you agree with the articulation of the possible challenges to unlocking the benefits of decentralisation? If not, why not?**

13. Yes. We agree that rapid electrification is a worthy objective. The adoption of renewable energy needs to meet the needs of those that are most vulnerable and in the most need.

**Question Four - Do you agree with the articulated opportunity statement for a more decentralised electricity system? If not, why not?**



14. The articulation appears at odds with current government policy around the oil and gas sector. Incentivising extractive, emissions producing industries sends the wrong signal. We are concerned at the apparent transition delay approach the government is taking. This approach is in line with most other western countries where vested interests are in danger of having their oil and gas assets stranded by a comprehensive and rapid transition to renewable electricity.

**Question 5 - What other feedback would you like to provide to input into the discussion on, for example:**

**A) what a more decentralised electricity system might look like,**

It would actually be decentralised to allow consumers to control their own energy needs – not a perpetuation of existing monopolies on generation, trading, and retail in the electricity sector.

**B) how this might benefit consumers, and**

This would allow competitors to enter the market and consumers to exercise their power as consumers.

**C) what might be needed to unlock these benefits.**

A change in legislation and corporate behaviour to move away from the profit maximization economic model.

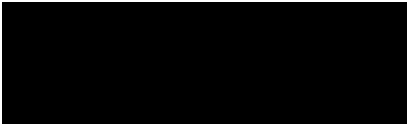
**Question Six - What are other emerging case studies we could learn from?**

15. High performing electricity markets are characterised by competitiveness, resilience, integration, sustainability, and inclusiveness. A high performing electricity market for Aotearoa New Zealand needs to do all these things plus the regulator needs to acknowledge te Tiriti o Waitangi in legislation and practice. Energy inequality disproportionately affects Māori – allowing communities to build energy sovereignty provides a means to address that inequality.
16. The non-extensive list of international examples of decentralised energy systems is based on three countries – the United States, the United Kingdom, and Australia. Sweden uses a combination of wind, bioenergy, and solar and is on track to achieve 100% fossil-free renewable electricity production by 2040<sup>6</sup>. Other countries such as Germany, Uruguay, China, and Norway are leading the way in the development of renewable energy.
17. Decentralised Renewable Energy Solutions (DRES) are necessary where the conventional distribution of electricity is neither efficient nor profitable<sup>7</sup>.

## Hei Whakakapi

18. Decentralisation of the electricity system must prioritise consumer empowerment, energy sovereignty, and genuine competition, rather than reinforcing the dominance of gen-tailers and centralised control. Achieving this will require legislative reform and inclusive consultation with iwi and hapū.

Pai Mārire,



Te Aorangi Dillon

Tumu Whakarae

Te Korowai o Ngāruahine Trust