

15 December 2025

Electricity Authority  
Level 7 AON Centre  
1 Willis Street  
Wellington, 6011

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

## **Horizon Energy Distribution Limited (Horizon Networks) submission reducing barriers for new connections**

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2. Horizon Networks is a small trust-owned Electricity Distribution Business (EDB) serving over 25,000 consumers in the Eastern Bay of Plenty region. As a trust-owned EDB, we have a strong consumer focus and seek to benefit both our Shareholder Trust Horizon and the communities we serve.

*The implementation of connection pricing changes should be delayed*

38. The Electricity Authority identified eight 'minor' code amendments to improve clarity and reflect policy intent.
39. While Horizon Networks appreciates the improved clarity, Horizon Networks has been working at pace to endeavour to understand and implement the suite of connection pricing requirements ahead of 1 April 2026.
40. To meet the 1 April 2026 deadline, we have reviewed our existing pioneer scheme and connection policies, and we need to review and rewrite these, even in early 2026 will impact our timeline and ability to meet the 1 April 2026 deadline.
41. These clarifications drive uncertainty, and if approved, will require Horizon Networks to review, rewrite and redevelop its policies, models and underlying operational processes.
42. This will include reviewing and updating our policies, systems and BAU processes for managing pioneer schemes and connection charge reconciliation.
43. In particular, the policy change to exclude customer-selected enhancements from vested pioneer schemes will impact our pioneer scheme systems and processes. Horizon Networks will need to develop a mechanism to identify and collect information regarding the 'connection enhancement costs' the customer is paying their selected contractor for vested assets and quantify the minimum scheme. Horizon Networks does not currently hold this information or have a process for identifying what a 'minimum scheme' is for works not constructed by the network.
44. Updating our pioneer scheme and connection charge reconciliation cannot be done between the time a decision is made if to amend the Code (and the form it should take) and the 1 April 2026 deadline.
45. Given the complexity of pioneer schemes and reconciliation processes, and the fact that these methodologies will take time to mature, moving from a 1 April 2026 to a 1 July 2026 implementation date for connection charge reconciliation and pioneer schemes is essential to avoid compliance risk and consumer confusion.
46. **Horizon Networks recommends:** The Electricity Authority proceed with the proposed definition changes and move implementation of the connection pricing Code changes to 1 July 2026. This will improve consumer outcomes by increasing the likelihood that Horizon Networks can implement the September 2025 changes and the necessary corrections resulting from this consultation, which the Electricity may choose to adopt and publicise in early 2026.

*In conclusion, Horizon Networks supports the intent to clarify consumer outcomes; however notes that errors and hasty decisions risk long-term consumer harm*

47. The Electricity Authority is regulating 'at pace', and this is risking long-term harm to consumers. We are seeing the impact of this haste in this consultation:

- No time is being provided to allow EDBs to alter their implementation timeline to correct the multiple drafting errors.

Yours Sincerely



Jonathon Staite  
Regulatory Manager



HORIZON ENERGY DISTRIBUTION LIMITED

**PART C – Minor amendments to the Code (connection pricing requirements)**

Q9. Do you have any comments on the drafting of the proposed amendments?

These minor amendments reflect the imperfect regulations that the Electricity Authority is introducing at pace, and the lack of consideration for the participants who need to implement these changes.

Several of the proposed 'minor' amendments are disruptive and will require Horizon Networks to source information it does not have and develop new systems and processes regarding vested assets associated with pioneer schemes and its connection charge reconciliation model.

Horizon Networks will not be able to make these changes in time for 1 April 2026, and implementation should be delayed to 1 July 2026.