



TCF Submission on the Electricity Distribution Discussion Document
7 October 2026

Introduction

1. Thank you for the opportunity to make a submission on the Discussion Document for the Electricity Distribution Businesses¹ (the discussion document). This submission is made on behalf of the New Zealand Telecommunications Forum (TCF), the industry association for the telecommunications sector. Our members include network operators, retail service providers, and the companies that own and operate cell towers. Northpower Fibre was not involved in the development of this submission.
2. The telecommunications sector relies on electricity to run its networks. Electricity is needed to power mobile towers and radio equipment, exchanges, roadside cabinets, and the optical network terminals (ONTs) and routers that provide connectivity to homes and businesses.
3. Telecommunications tower companies and network operators work with electricity distribution businesses (EDBs) regularly, to obtain electricity connections and upgrades for telecommunications infrastructure. The connection process starts with requests to EDBs to establish if there is adequate power supply for potential sites, and for connection designs and quotes.
4. Most of our members operate national networks, so dealing with 28 EDBs with different processes, levels of transparency and connection timeframes can be challenging. We therefore welcome the discussion about collaboration and standardisation. Our submission shares the experience of the telco sector, and suggests areas where standardisation would be beneficial.

1

<https://www.mbie.govt.nz/dmsdocument/32336-discussion-document-for-improving-the-efficiency-of-electricity-distribution-businesses>

5. We also comment on some of the proposals concerning Commerce Commission powers. The TCF supports proportionate, evidence-based regulation. New regulatory interventions should respond to a clearly identified problem, be supported by evidence proportionate to the proposed intervention, and go no further than necessary to address that problem.

Suggested areas for standardisation

6. EDBs have different application processes, technical design requirements, quotation methodologies, documentation standards and commercial arrangements. This is a problem for telecommunications operating across regions for several reasons:
 - a. It increases costs
 - b. It causes delays
 - c. It creates uncertainty for infrastructure build.
7. Cost, delays and uncertainty in electricity connection processes have broader consequences than the projects directly affected. They can delay telecommunications network upgrades, leaving businesses and communities waiting longer for improved connectivity. As telecommunications networks are fundamental to economic growth, productivity, public safety, emergency response, and digital inclusion, delays in electricity connections can have cascading effects.
8. We recommend standardisation in the following areas, through an industry led process, with support from MBIE where needed.

Areas of variation	The issue	Suggested standardisation
Application processes	The differences create transaction costs because telcos need to learn and navigate a separate process in each region for similar projects. Application process differences do not improve network outcomes.	Develop standard application processes and forms, to remove unnecessary administrative burdens from regional variation.
Information about network capacity	Telcos often need to make inquiries to understand whether there is sufficient network capacity to support a proposed development or telecommunications facility.	Create a framework for nationally consistent and publicly accessible information on network capacity and connection availability. It would be useful if information

	Several potential sites may be in contention, with electricity supply considered alongside other factors such as radio frequency and space for infrastructure on or under the roadside. Not being able to access information on network capacity early in the process creates uncertainty, delays investment decisions and can result in unnecessary expenditure on projects that later encounter network constraints.	about the following was made available by all EDBs: • Whether a standard commercial electricity supply can be expected at a location. • Indicative available capacity or applicable capacity thresholds. • Likely network upgrade requirements. • Typical connection and upgrade lead times. • Planned network upgrades that may affect future availability. We understand that for smaller EDBs it may not make sense to invest in digital tools for this purpose and that information could be made available in other ways.
Quotation, design and connection timeframes	Telcos face considerable delays in getting design solutions, cost estimates and connections from some EDBs. This is six to nine months in some regions.	Published service level targets for design responses, quotation turnaround, connection approvals and escalation.
Approved suppliers for physical works	Some EDBs do not allow the use of alternative suppliers for physical works, while most allow more than one “approved” contractor to work on their network. Where there is a choice of provider for physical works the ability to directly engage with them on projects is limited, and there is no consistent approach across networks in this area either.	We recommend that EDBs allow: • A choice of providers for physical works • Direct engagement with suppliers for physical works.
Transparency of design and costs	EDBs vary in the level of transparency about design assumptions, alternatives	EDBs to provide enough information for customers to understand and test proposed

	considered, network constraints, cost drivers, and the allocation of construction costs. There is also variance in how much of the costs are passed on. Some EDBs will pass all costs on, while others will share costs.	solutions, assess value for money and identify reasonable alternatives.
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Other proposals

9. The TCF considers the discussion document does not provide sufficient evidence to justify the significant regulatory interventions proposed under Options 1B and 2A. Any such measures should respond to a clearly identified problem, be supported by evidence proportionate to the proposed intervention, and go no further than necessary.
10. If you have any questions about our submission please contact kim.connolly-stone@tcf.org.nz.