



Energy Portfolio Weekly Report

Week commencing:	06/10/2025	Priority:	Medium
Security classification:	In Confidence	Tracking number:	BRIEFING-REQ-0021714
Recipient		Action sought	
HON SIMON WATTS		Note the contents of	f this report
MINISTER FOR ENERGY			

Justine Cannon General Manager Energy Markets Branch

Ministry of Business, Innovation and Employment



3 October 2025

Minister's comments:

Energy Portfolio Officials' Meeting Agenda 11.10 am to 11.50 am Tuesday 7 October 2025

Item	Subject	People	Oral Item / Paper #	Action Required
1.	Review Work Programme	Justine Cannon	А3	Discussion
2.	Energy Strategy	Sharon Corbett	Oral	Discussion
3.	Weekly Report & Work Programme	Minister	Oral	Discussion
4.	Any other business	All	Oral	Discussion

Ministry of Business, Innovation & Employment officials attending:

Name	Position
Suzanne Stew	(Acting) Chief Executive and Secretary
Paul Stocks	Deputy Secretary, Building, Resources and Markets
Justine Cannon	General Manager, Energy Markets
Sharon Corbett	Policy Director, Energy Markets
Rebecca Heerdegen	Policy Director, Energy Markets

Action and outcome	Updates	Status and upcoming milestones
	Priority One: Energy Gap	
Electricity Market Review Independent review to advise on the impact of market structure, design, and rules on the electricity systems' performance	The Government's response to the Review was announced on Wednesday 1 October. We provided your Office with a suite of communications materials for the announcement and continue to provide support in the post-announcement period.	On track Report-backs to Cabinet in December 2025 and Q1 2026
Confider Procurement process for	This week we launched the procurement process for international	nmer
LNG Import Facility Services	technical and legal services. We have secured domestic legal services. This will support the LNG procurement process. Commercial Information On Monday 6 October we will be releasing the Project Information	
	Memorandum (PIM) and the Registration of Interest (ROI) to test market interest including possibilities to deliver LNG quickly.	
Work underway to bolster the Electricity Authority	Memorandum (PIM) and the Registration of Interest (ROI) to test	On track

Improving gas market

transparency

Workstream 1: On 18 August 2025, we briefed you on our work to improve gas sector transparency [BRIEFING-REQ-0015969], including a proposed change to the annual report deadline from 31 March to 1 February. The Minister for Resources agreed to consult permit and licence holders on this change, which would allow MBIE to publish reserves data earlier. Consultation with permit and licence holders closed on 26 September 2025 and consultation with iwi closes on 8 October 2025.

On track

November

Report back in

On 1 October NZGP released the Request for Information seeking responses from businesses with potential energy projects that would

add to electricity and/or (non-transport) fuel supply.

We will provide you with a summary of feedback and advice on next steps for the proposed deadline change following these consultations in October.

Workstream 2 and 3:

We intend to begin targeted consultation on 6 October 2025 regarding additional gas market information we may request from market

participants. This consultation was postponed until after the announcement on the government's response to the independent review of electricity market performance. The consultation feedback will help shape a voluntary information request for gas market information, which we aim to issue by the end of the first quarter of 2026 at the latest.

Confidential advice to Government

Confidential advice to Government

Energy Strategy

Developing a public-facing strategy that will set out the Government's role in creating an energy system that is fit for the future.

Confidential advice to Government

Confidential advice to Government Wood Energy Strategy Investigating barriers to the development of the domestic supply chain and Targeted consultation on the draft wood energy strategy has now closed and MBIE are currently processing feedback. We will provide you and the Minister of Forestry a final Strategy for approval in October, for announcement at Residues2Revenues on 22 October.

Modelling work on economic impacts of declining gas supply

export opportunities for

wood bioenergy.

We are currently procuring consultancy services to complete a study into the impact of declining gas supply on the New Zealand economy, with an aim to understand sectoral, regional, and national economic impacts of industrial gas price increases. This will help to inform further policy work on potential options to manage the effects of our declining gas supply.

Confidential advice to Government

The RfP closed on 29 September, and we received four responses from potential suppliers. We expect to select a supplier in the week of 9 October, and the contract is expected to begin by the end of October 2025.

On track

Priority Two: Confidential advice to Government

Confidential advice to Government

Electricity and Gas Safety Standards (including permitted voltage range)

Updating 400+ references to international standards in the *Electricity (Safety)*Regulations 2010 and the Gas (Safety and Measurement) Regulations 2010. This includes new standards for solar and EV chargers, reducing costs

No change: You signed the Cabinet paper on 18 September and have agreed to circulate for ministerial consultation aiming for lodgement on 2 October and Cabinet LEG on 9 October. The regulations will take effect on 13 November (allows for 28 Day Rule). PCO and WorkSafe have confirmed this date is feasible.

Delayed

Draft LEG paper with you on 18 September 2025. Lodgement on 2 October for 9 October LEG.

Confidential advice to Government

Priority Three: EDB Efficiency and reliability

EDB efficiency and networking pricing/connections

Work across MBIE and regulators to improve EDB performance and efficiency

Standardisation and collaboration

The letter of expectation to EDBs is scheduled to be sent on Monday 6 October.

The procurement process is underway for an expert to provide independent recommendations to improve EDB standardisation and collaboration.

Confidential advice to Government

On track

EA Code changes come into effect over various dates from April 2026

Letter to EDBs to be sent on 6 October

Relevant work at the Electricity Authority

The Authority has a number of workstreams underway relating to EDB connection processes and pricing.

Connection prices

In July 2025, the EA decided on four new connection pricing requirements:

- EDBs must set prices with reference to a 'least cost technical solution' – ie letting the customer agree to a cheaper option than otherwise may be proposed
- EBDs must develop a policy on 'pioneer schemes' ensuring applicants who fund a network extension receive rebates from those who follow and utilise the same network.
- EDBs must, on request, provide a standardised breakdown of their quoted connection charges into specific, defined components
- If an EDB charges for capacity costs, it must do so using published rates which reflect the average cost of adding network capacity, rather than the entire cost of an upgrade being allocated to the customer happening to trigger the upgrade.

The EA is further considering decisions on:

- Reliance limits which restrict how much electricity distributors could recover from up-front connection charges; and
- The obligation on distributors to connect all applications that meet certain criteria.

Connection processes

The EA has also made decisions on Code changes in relation to EDB connection processes:

- An amended application process for larger distributed generation – to be better deal with speculative projects in the connection queue
- A new application process for larger load projects creating greater consistency across EDBs
- Requiring EDBs to publish pipeline information for large upcoming load/generation connections
- Requiring EDBs to provide more information on network capacity.

Confidential advice to Government **Priority Four: Offshore Wind** Offshore Renewable Energy Cabinet agreed changes to the offshore renewable energy legislation on **Delayed** 15 September. We have issued drafting instructions to PCO for preparation of an amendment paper. Confidential advice to Government The timing of next steps is contingent on the In the meantime we will timeframes to continue to work on the amendment paper, secondary legislation, amend and finalise round notice and implementation planning so the first round can be the Bill opened shortly after the Bill passes. Other (MBIE Energy branch) workstreams On track Hydrogen regulations No Change: Consultation on Enabling Hydrogen: technical changes to safety regulations closed on Monday, 21 July 2025 and we have Delivering Hydrogen Action **Briefing October** received 11 submissions. and Cabinet in Plan commitment to amend safety regulations to enable We are now analysing submissions in conjunction with Health and November Safety policy officials and WorkSafe NZ. Confidential advice to Government hydrogen No Change. We have worked with EECA to develop four draft goals and **New Zealand Energy** On track **Efficiency and Conservation** high-level targets for the New Zealand Energy Efficiency and Strategy (NZEECS) Conservation Strategy (NZEECS). Confidential advice to Government Develop a refreshed strategy that meets legislative requirements. **Consumer Data Right** Delayed Confidential advice to Government Deliver a CDR for the We have provided you a electricity sector briefing on consultation. Aiming for policy decisions in Q.4 **Energy workforce planning** MBIE is collaborating with Energy Resources Aotearoa (ERA) and the N/A prototype Electricity Engineers' Association (EEA) on the development of the Re-Energise 2025 Energy Industry Workforce Report and Action Plan. Industry and MBIE (Labour Market policy-led) collaboration to develop an

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energy workforce report and action plan

The ERA and EEA have decided to delay the release of the national workforce report and action plan to early 2026 but intend to publicly release early insights in December 2025 (which we will brief you on).

MBIE's first tranche of work (lead by the Labour Market Performance

MBIE's first tranche of work (lead by the Labour Market Performance and Policy team) is progressing well, and meetings are set in October to test the rationale for government action and determine next steps.

The delays provide opportunities for MBIE to contribute to more work and analysis.

Implementing Electrify NZ

Resource managementreforms to support investment in energy projects Consultation on updated RMA national directions, including renewable electricity and electricity networks direction, has closed. The Minister for RMA Reform will soon consult you on final proposed changes to energy-related RMA national policy statements – these are intended to be in place by the end of 2025. Confidential advice to Government

The Resource Management (Consenting and Other System Changes) Amendment Bill has now entered into law. This Bill implemented some Electrify NZ proposals including one-year consent decisions for energy projects, and default 35-year consent durations.

Market Enhancements via Energy Competition Task Force (EA and Commerce Commission)

Energy Competition Taskforce

Joint EA and Commerce Commission investigation of options to improve competition and enable consumers to manage usage and costs 1B Standardised flexibility contracts:

No change: On 19 August, the EA commenced consultation on an 'Issues and Options' paper on standardised flexibility contracts. The paper confirms EA concerns that current trading volumes are shallow and must improve. They propose voluntary trading continues and outlines options for mandatory trading of minimum volumes, if liquidity doesn't improve. The threshold to move to mandatory trading will be two consecutive quarters, from January 2026, of trading falling below defined levels. If mandatory trading is required, it will be ready to be in place by mid-2026. Consultation closes 30 September.

1C+D level playing field measures: The EA is planning to release a consultation paper for the draft Code amendments to implement its 'in principle' non-discrimination obligations. The paper is due to be released on 6 October, pending EA Board approval. The Commission has provided its endorsement of the paper.

The EA also confirmed it will start a review of market marking.

Confidential advice to Government

2D Better compensating industrial flexibility (demand response):

No change: On 28 May 2025 the EA published its 'Roadmap for industrial demand flexibility'. On 31 July the EA started consultation on an issues paper relating to an industrial flexibility emergency reserve scheme, consultation runs until 28 August.

On track

Regular reporting

Title Comment Transpower's review of of Transpower is reviewing the Security of Supply Forecasting and Information Policy, access to contingent hydro which includes the decision criteria and process governing hydro generators' access to storage contingent storage. Transpower plans to release proposed amendments to the policy in the week commenting 6 October. The proposal would materially improve access to contingent storage, but not to the extent requested by Meridian and Contact Energy. Meridian and Contact are, separately, seeking changes to respective resource consent conditions under the Fast-track Approvals Act. Potential commercial deals On 30 September, the Commerce Commission released its draft determination on the to enhance winter security proposed arrangement between the four gentailers to create a Huntly Strategic Energy of supply Reserve. The Commission found that the arrangements will likely result in a net public Methanex gas deal benefit and provisionally considers it appropriate to authorise the arrangement. Industry actions to The Commission considers it likely that, in the absence of this arrangement, Rankine improve security of Unit 2 would retire in early 2026. Therefore, the Commission considers that the supply via Huntly arrangement will result in the following benefits: contracts Demand response deals Improved security of supply, particularly during dry winters Lower wholesale prices and/or reduced volatility 135 MW of additional unallocated capacity being made available as hedge cover to a wider range of interested parties. The Commission views that any detriments are likely to be minimal - unlikely to facilitate enhanced coordination or increase the ability to exercise market power. This decision by the Commission is a draft determination. Interested parties will have an opportunity to submit their views on the Commission's findings before a final decision is made. The Commission was not explicit on when it will deliver its final decision. Its statutory deadline for a decision is 16 February 2026. However, we understand that a final decision is likely to be made before this (potentially in November). **Electricity security of supply ELECTRICITY CAPACITY (for the week to Sunday 28 September)** report Capacity margins were healthy last week with residual over all peaks exceeding 1000 Tamara Linnhoff MW. This was a result of high wind generation, decreasing demand and an improving Privacy of natural persons hydro storage. The N-1-G margins are healthy through to the end of November: NZGB Look-Ahead (excluding next 7 days) 2,000 Source: System Operator, Market Operations - Weekly Market Movements **ENERGY (HYDRO) STORAGE RELATIVE TO MEAN (for the week to 28 September)** Following recent rains, national hydro storage improved to 107% of its historical

while North Island storage increased from 114% to 137%.

(mean) average for this time of year. South Island storage increased from 93% to 102%,

ELECTRICITY ('ENERGY') SUPPLY RISK (at 28 September)

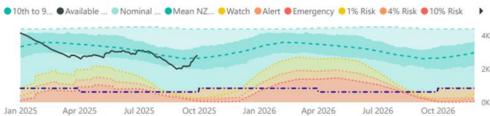
New Zealand controlled energy storage is average for this time of year. The black curve shows the actual hydro storage and the fields are risk curves:

Dark blue (including dotted blue line) = average for this time of year;

Yellow = Watch curve; Orange = alert curve; Dark orange = Emergency curve;

Lowest hatched blue line = Available contingent storage.

New Zealand Electricity Risk Status Curves (Available GWh)



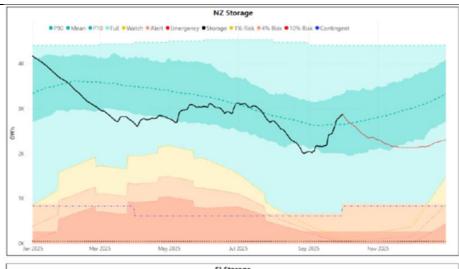
Source: System Operator, Market Operations - Weekly Market Movements

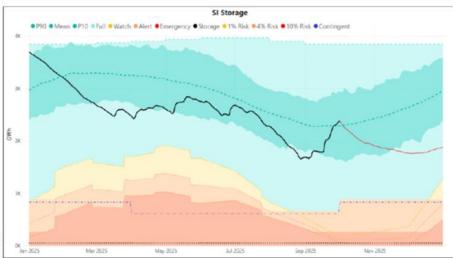
The System Operator updated the ERCs on **25 September.** ERCs have lifted for most months in 2026 relative to the August update. This update of the Energy Security Outlook includes the effects of hydro storage at the time, slightly decreased gas production forecasts relative to Transpower's previous outlook, and the announced retirement of a Huntly Rankine unit in January 2026. If the Rankine is not retired, the risk position for 2026 will improve and only four simulated storage trajectories cross Watch.

The Risk Meter is a dynamic reflection of the current Electricity Risk Status. The Risk Meter shows where current total storage is within these status bands and indicates how close the next status is to being triggered.



To show the number of days until the NZ system hits energy risk curves - if it does not rain - Transpower have extended the actual hydro storage position (black line) along the worst-case simulated storage trajectory (SST) (red line):





The ERCs shown were calculated using input data as of **15 September** (though published in the ERCs on 25 September). The worst-case SST line was calculated using hydro inflow data starting from 29 September.

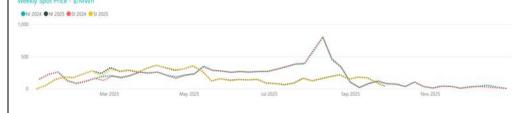
Worst case inflows - Time to cross successive curves

Region	Date Watch	Time to Watch	Date Alert	Time to Alert	Date Emergency	Time to Emergency
NZ	N/A	N/A	N/A	N/A	N/A	N/A
SI	N/A	N/A	N/A	N/A	N/A	N/A

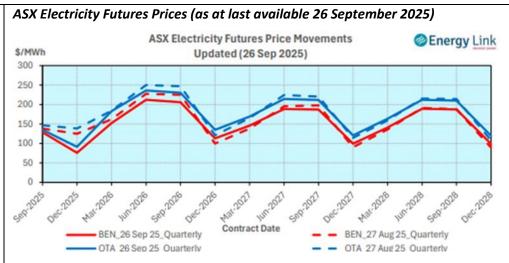
This week the worst-case SST (the **red** line) does not cross the national NZ or South Island Watch curve in 2025. The red line does not cross the Alert curve in 2025, which would be necessary for generators to be able to access contingent storage.

WHOLESALE ELECTRICITY PRICES

Weekly Spot Price (week ended 28 September 2025)



Source: System Operator, Market Operations - Weekly Market Movements



Source: Energy Link, Energy Trendz Weekly

Transpower's Connections Queue for Generation – improvements to increase project throughput

Run rate to start generation investigations (queue) up by 80% in 2025, on 2024. 43 investigation projects started and 13 projects moved to delivery in 2025. 8 grid connections completed.

Decrease of 32 projects in queue since January 2025. Wait time for new applications is now ~12 months.

16 new applications received since January 2025 (and one cancelled).

Daniel Brown

Privacy of natural persons (content supplied by Transpower)

Improving throughput:

Implemented:

- Stage-gating within investigation phase.
- Starting work elements earlier pre-investigation where resources are available (while they wait in queue).
- Published 'Guidelines for new connections' document.
- Connection status information published monthly on Transpower website.
 Published short guide to SOSA (for RMA decision-makers) to highlight need to consent and build new renewable generation.
- New CRM system live.
- Guidelines around customer-led investigation and delivery substantially completed.

Work continuing to investigate/implement:

- Right-sizing investigations to meet customer needs and risk appetite.
- Investigation initiation to confirm a preferred connection with acceptance and commercial terms to reduce optioneering and accelerate investigation stage.
- Targeted regional plans, identifying project sequencing and interdependencies to improve efficiency.
- Standard equipment lists now including digital substation for standardised designs for greenfield substations.
- Prioritisation options within the queue, based on security of supply (including how soon generation can commence to meet forecast demand).

Resourcing improvements:

 Continuing to work with engineering consultants (ECs) on utilisation, ECs growing their resources and different work award mechanisms for larger and bundled projects.

Monthly Oil and Gas production data

Amapola Generosa



We will be publishing the August 2025 update of our monthly oil and gas production data on Thursday 09 October. This shows that net production of natural gas in August 2025 was 8.41 PJ, down 3% on July 2025 (8.69 PJ) and down 19% on August 2024 (10.40 PJ). Driving this was lower deliveries from most major fields, with Maui seeing the largest reduction.

	We publish this data regularly, on the second Thursday of each month. This data gives a comprehensive view of gas production in New Zealand (other public data, such as Gas Industry Company production figures, are based solely on public pipeline data and are less comprehensive). Data for a given month is available 6 weeks after month-end.
Electricity pipeline updates	The EA provides information to you monthly on its generation pipeline dataset.

Current appointments

Confidential advice to Government

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Upcoming Ministerial Items

1. Upcoming Energy meetings

Meeting date	Meeting	Details
Wednesday 8 October 2025 10:40 am - 10:55 am	X Tapestry Meeting with Minister Watts	Briefing Due: 3 October 2025 Officials required: Daniel Brown
Wednesday 8 October 2025 11:45 am - 12:15 pm	Brandon Keefe	Briefing Due: 6 October 2025 at Midday Officials required: Tamara Linnhoff
Thursday 9 October 2025 10:30 am - 11:00 am	Electricity Authority	Briefing Due: N/A Officials required: Justine Cannon
Thursday 9 October 2025 11:00 am - 11:20 am	Commerce Commission	Briefing Due: N/A Officials required: Justine Cannon
Thursday 9 October 2025 11.20 am - 11.40 am	Transpower	Briefing Due: N/A Officials required: Justine Cannon

2. Upcoming Briefings, Aides Memoires and Cabinet Papers

To be publically released shortly

3. Written Parliamentary Questions

Due to Minister	Number	Member	Question
9 October	47983	Francisco Hernandez	What was the average wait time, if any, for customer service lines, if any, in the Minister's departments, crown entities and any other bodies that the Minister is responsible for, if any, as of 1 October 2025?
9 October	47995	Francisco Hernandez	What was the average wait time, if any, for customer service lines, if any, in the Minister's departments, crown entities and any other bodies that the Minister is responsible for, if any, as of 1 October 2023?
9 October	47996	Francisco Hernandez	What was the average wait time, if any, for customer service lines, if any, in the Minister's departments, crown entities and any other bodies that the Minister is responsible for, if any, as of 1 October 2021?
9 October	48000	Francisco Hernandez	What was the average wait time, if any, for customer service lines, if any, in the Minister's departments, crown entities and any other bodies that the Minister is responsible for, if any, as of 1 October 2024?
9 October	48003	Francisco Hernandez	What was the average wait time, if any, for customer service lines, if any, in the Minister's departments, crown entities and any other bodies that the Minister is responsible for, if any, as of 1 October 2020?
9 October	48011	Francisco Hernandez	What was the average wait time, if any, for customer service lines, if any, in the Minister's departments, crown entities and any other bodies that the Minister is responsible for, if any, as of 1 October 2022?

4. Ministerial Correspondence received

Due date	Tracking number	Correspondent	Summary of Correspondence
9 October 2025	SW25-298	Privacy of natural persons	Power outages
16 October 2025	SW25-300	Privacy of natural persons	Pathways for Businesses to decouple from gas usage
21 October 2025	SW25-301	Privacy of natural persons	Electricity Costs
21 October 2025	SW25-302	Privacy of natural persons	Rewiring Aotearoa Manifesto
21 October 2025	SW25-303	Privacy of natural persons	Voltage limits
21 October 2025	SW25-304	Privacy of natural persons	Electricity Generation and Pricing
21 October 2025	SW25-305	Privacy of natural persons	Costs of Residencial Gas.
21 October 2025	SW25-306	Privacy of natural persons	Use of Solar to reduce energy bills.
21 October 2025	SW25-307	Privacy of natural persons	Solar and Wind Farm Consents

5. Output plan













Energy Portfolio Weekly Report

Week commencing:	13/10/2025	Priority:	Medium
Security classification:	In Confidence	Tracking number:	BRIEFING-REQ-0022105
		Action sought	
Recipient		Action sought	
HON SIMON WATTS		Note the contents of	f this report
<u> </u>			f this report

Sharon Corbett **Policy Director**Energy Markets Branch

Ministry of Business, Innovation and Employment

10 October 2025

Minister's comments:

Energy Portfolio Officials' Meeting Agenda 12:00 pm – 12:30 pm Tuesday 14 October 2025

Item	Subject	People	Oral Item / Paper #	Action Required
1.	Wood Energy Strategy	Scott Russell	BRIEFING-REQ- 0020436	Discussion
2.	Confirming the cross- portfolio gas security work programme	Rebecca Heerdegen Scott Russell Dominic Kebbell	BRIEFING-REQ- 0020627	Discussion
3.	Weekly Report & Work Programme	Minister	Oral	Discussion
4.	Any other business	All	Oral	Discussion

Ministry of Business, Innovation & Employment officials attending:

Name	Position	
Suzanne Stew	(Acting) Chief Executive and Secretary	
Paul Stocks	Deputy Secretary, Building, Resources and Markets	
Justine Cannon	General Manager, Energy Markets	
Scott Russell	Manager, Energy Use Policy	
Dominic Kebbell	Manager, Gas and Fuels Policy	
Rebecca Heerdegen	Policy Director, Energy Markets	

Action and outcome	Updates	Status and upcoming milestones
	Priority One: Energy Gap	
Electricity Market Review Independent review to advise on the impact of market structure, design, and rules on the electricity systems' performance	The Government's Energy Package was announced on Wednesday 1 October. We provided your Office with a suite of communications materials for the announcement and continue to provide support in the post-announcement period. We are finalising the programme of work to deliver the Energy Package in response to feedback from you/your office.	On track Report-backs to Cabinet in December 2025 and Q1 2026

Confidential advice to Government

Procurement process for LNG Import Facility Services	This week (on Monday 6 October) we launched the Project Information Memorandum (PIM) and the Registration of Interest (ROI) to test market interest including possibilities to deliver LNG quickly. We also expect to secure international legal counsel in the coming week. This will support commercial negotiations and contracting. We are developing the wider options analysis to support Cabinet decisions in December on whether to proceed with LNG, and whether an accelerated delivery option could be suitable.	On track Report-back to Cabinet in December
A Stronger Electricity Authority	We will provide you with a briefing in mid-October seeking your feedback on key policy matters and have scheduled a 'Chew Session' on Wednesday to present our proposed approach and hear your thoughts. This will be followed by more detailed advice and a draft Cabinet paper in November 2025.	On track
Crown energy PPAs Exploring the use of government energy demand to support development of energy projects	Information seeking responses from businesses with potential energy overnment energy demand o support development of	
Improving gas market transparency	Workstream 1: More timely annual reserves and forecast information We have just completed consulting petroleum permit and licence holders and iwi and hapu on bringing forward the due date for the Annual Summary Reports. We intend to brief you and Minister Jones on the outcome and seek your approval for a new date by the end of October. We are aiming to make the required regulatory changes to affect next year's reporting. Workstream 2: Additional gas market information On 6 October 2025, we started targeted consultation on potential additional gas market information we may request from market participants. We have asked for submissions by 7 November 2025. Feedback from this consultation will inform a voluntary information request, which we plan to issue by the end of Q1 2026 at the latest.	On track Report back in November

Confidential advice to Government



Confidential advice to Government

Energy Strategy

Developing a public-facing strategy that will set out the Government's role in creating an energy system that is fit for the future.

Confidential advice to Government

Wood Energy Strategy

Investigating barriers to the development of the domestic supply chain and export opportunities for wood bioenergy.

We provided you with a joint briefing (with Minister McClay) on the outcomes of our targeted engagement on the Wood Energy Strategy and copies of the Strategy and associated Action Plan for your final approval. Your approval (or any changes you want made) is required by 15 October to meet internal deadlines to publish the documents.

This briefing also includes advice on your queries about domestic wood supply and steps to improved consenting processes for wood energy combustion facilities.

We will provide you with an event briefing and speech ahead of the Residues2Revenues conference on 22 October where you will release the Wood Energy Strategy and associated Action Plan. The Biogas Policy Statement will also be released at the Residues2Revenues conference.

On track

Strategy and Action Plan to be publicly released on 22 October.

Modelling work on economic impacts of declining gas supply

We are currently procuring consultancy services to complete a study into the impact of declining gas supply on the New Zealand economy, with an aim to understand sectoral, regional, and national economic impacts of industrial gas price increases. This will help to inform further policy work on potential options to manage the effects of our declining gas supply.

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Confidential advice to Government

Electricity and Gas Safety Standards (including permitted voltage range)

Updating 400+ references to international standards in the Electricity (Safety) Regulations 2010 and the Gas (Safety and Measurement) Regulations 2010. This includes new standards for solar and EV chargers, reducing costs

The amendment regulations were agreed to by Cabinet LEG Committee on 9 October and will be submitted to the Executive Council on 13 October, for gazettal on 16 October. The regulations will take effect on 13 November 2025 (allows for 28 Day Rule).

MBIE is currently working on communications to publicise the changes.

On track

Regulations agreed to by LEG on 9 October and will take effect from 13 November

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Confidential advice to Government

Priority Three: EDB Efficiency and reliability

EDB efficiency and networking pricing/connections

Work across MBIE and regulators to improve EDB performance and efficiency

Standardisation and collaboration

The letter of expectation to EDBs was sent on Monday 6 October. We are working with Electricity Networks Aotearoa (ENA) to set up a webinar where EDBs can ask questions about the letter and clarify what you may expect in their response.

The procurement process is underway for an expert to provide independent recommendations to improve EDB standardisation and collaboration. The RFQ was sent to selected consultants on 2 October, and the deadline for responses is 16 October.

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EA Code changes come into effect over various dates from April 2026

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Relevant work at the Electricity Authority

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rather than the entire cost of an upgrade being allocated to the customer happening to trigger the upgrade.

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- A new application process for larger load projects creating greater consistency across EDBs
- Requiring EDBs to publish pipeline information for large upcoming load/generation connections
- Requiring EDBs to provide more information on network capacity.

The EA has also commenced consultation on proposals around solar export limits and power bill standardisation.

Confidential advice to Government

Priority Four: Offshore Wind

Offshore Renewable Energy

Cabinet agreed changes to the offshore renewable energy legislation on 15 September. We have issued drafting instructions to PCO for preparation of an amendment paper.

Confidential advice to Government

In the meantime we will

continue to work on the amendment paper, secondary legislation, round notice and implementation planning so the first round can be opened shortly after the Bill passes. We are running targeted consultation with offshore wind and seabed mining developers to test how the changes to the legislation can work in practice.

Delayed

The timing of next steps is contingent on the timeframes to amend and finalise the Bill

Other (MBIE Energy branch) workstreams

Hydrogen regulations

Delivering Hydrogen Action Plan commitment to amend No Change: Consultation on Enabling Hydrogen: technical changes to safety regulations closed on Monday, 21 July 2025 and we have received 11 submissions.

On track

Briefing October and Cabinet in November

safety regulations to enable hydrogen	We are now analysing submissions in conjunction with Health and Safety policy officials and WorkSafe NZ. Confidential advice to Government Confidential advice to Government	
New Zealand Energy Efficiency and Conservation Strategy (NZEECS)	Confidential advice to Government are now considering the next steps for the New Zealand Energy Efficiency and Conservation Strategy (NZEECS).	Delayed Confidential advice to Government
Develop a refreshed strategy that meets legislative requirements.	Confidential advice to Government	
Consumer Data Right Deliver a CDR for the electricity sector	MBIE is progressing with advice on issues raised in submissions on proposals for an electricity sector Consumer Data Right. PowerSwitch to continue Consumer NZ has shared that their comparison and switching site PowerSwitch will continue to operate post Electricity Authority funding ceasing. The EA's new comparison and switching site run by Daylight is expected to be operational by February 2026. MBIE will engage with Consumer NZ when appropriate to discuss how PowerSwitch can make use of an electricity sector CDR.	Delayed We have provided you a briefing on consultation. Confidential advice to Government
Implementing Electrify NZ Resource management- reforms to support investment in energy projects	Consultation on updated RMA national directions, including renewable electricity and electricity networks direction, has closed. The Minister for RMA Reform will soon consult you on final proposed changes to energy-related RMA national policy statements – these are intended to be in place by the end of 2025. Confidential advice to Government	
	The Resource Management (Consenting and Other System Changes) Amendment Bill has now entered into law. This Bill implemented some Electrify NZ proposals including one-year consent decisions for energy projects, and default 35-year consent durations. We understand the Minister for RM Reform will soon consult other Ministers on the proposed RMA replacement legislation.	
Market Enha	ncements via Energy Competition Task Force (EA and Commerce Commiss	sion)
Energy Competition Taskforce Joint EA and Commerce Commission investigation of options to improve competition and enable consumers to manage usage and costs	1B Standardised flexibility contracts: No change: On 19 August, the EA commenced consultation on an 'Issues and Options' paper on standardised flexibility contracts. The paper confirms EA concerns that current trading volumes are shallow and must improve. They propose voluntary trading continues and outlines options for mandatory trading of minimum volumes, if liquidity doesn't improve. The threshold to move to mandatory trading will be two consecutive quarters, from January 2026, of trading falling below defined levels. If mandatory trading is required, it will be ready to be in place by mid-2026. Consultation closed on 30 September.	On track
	1C+D level playing field measures: On 7 October you received a briefing from the EA on their plan to release a consultation paper for the draft Code amendments to implement its 'in principle' non-discrimination obligations. The EA signaled that it has revised its approach following feedback on its draft consultation paper earlier this year. It views its proposal is a more practical approach that is faster to implement and easier to enforce. Consultation is planned to start on 14 October.	

Subject to consultation, the EA aims to have the amended Code in place in early 2026 with the obligations commencing on 1 July 2026.

The EA also confirmed it will start a **review of market making.** Confidential advice to Government

Confiden

2D Better compensating industrial flexibility (demand response): No change: On 28 May 2025 the EA published its 'Roadmap for industrial demand flexibility'. The EA consulted during August on an issues paper relating to an industrial flexibility emergency reserve scheme. It is now considering submissions.

Regular reporting

Title

Potential commercial deals to enhance winter security of supply

 Industry actions to improve security of supply via Huntly contracts

Comment

No change: On 30 September, the Commerce Commission released its draft determination on the proposed arrangement between the four gentailers to create a Huntly Strategic Energy Reserve. The Commission found that the arrangements will likely result in a net public benefit and provisionally considers it appropriate to authorise the arrangement.

The Commission considers it likely that, in the absence of this arrangement, Rankine Unit 2 would retire in early 2026. Therefore, the Commission considers that the arrangement will result in the following benefits:

- Improved security of supply, particularly during dry winters
- Lower wholesale prices and/or reduced volatility
- 135 MW of additional unallocated capacity being made available as hedge cover to a wider range of interested parties.

The Commission views that any detriments are likely to be minimal – unlikely to facilitate enhanced coordination or increase the ability to exercise market power.

This decision by the Commission is a draft determination. Interested parties will have an opportunity to submit their views on the Commission's findings before a final decision is made.

The Commission was not explicit on when it will deliver its final decision. Its statutory deadline for a decision is 16 February 2026. However, we understand that a final decision is likely to be made before this (potentially in November).

Gas security of supply report

Dominic Kebbell
Privacy of natural persons

Commercial Information

Clarus business to be sold

The Clarus Group (Clarus) has confirmed that its current shareholder, Igneo Infrastructure Partners, has entered into agreements to sells its shareholding in Clarus to Canadian-based investment firm Brookfield. The sale, which is subject to a number of conditions and requirements, will see Brookfield taking ownership of:

- Firstgas owner and operator of 4,800km of gas pipelines and 2,500km of high-pressure gas transmission networks
- Rockgas New Zealand's largest LPG retail supplier, and
- Flexgas operator of the Ahuroa gas storage facility.

In addition to the sale of Clarus' gas assets, Powerco has indicated it will purchase Clarus' electricity distributor asset Firstlight Network, which was formerly part of Eastland Group.

OMV is planning fracking campaign for the Pohokura gas field

According to Energy News, OMV is planning a fracking campaign to sustain output from the Pohokura gas field, starting from next year.

In its application to the Taranaki Regional Council, OMV seeks consent to frack five existing shore-based wells and three additional wells already approved for drilling near the Pohokura

production station. The application does not include estimates of additional gas production or projected economic benefits.

Output from the field has declined sharply since 2018. The field is reportedly currently producing around 32 terajoules (TJ) per day, which is just under half of its average daily production two years ago.

Fracking has been carried out in Taranaki's onshore fields since at least the late 1980s, with campaigns in recent decades at the Mangahewa, Kapuni, Kaimiro, Turangi and Cheal fields.

Ecogas: biomethane production

Dominic Kebbell
Privacy of natural persons

Ecogas owns and operates New Zealand's first commercial anaerobic digestion facility in Reporoa, converting food waste to biogas. It is also currently the only provider of biomethane into the reticulated system, injecting about 0.37 TJ per day (this is based on its existing three tanks).

Commercial Information

For context, New Zealand's current natural gas production is approximately 260 TJ per day. While Ecogas's contributions play a key role in supporting a future renewable gas market, current biomethane volumes will not alleviate the current natural gas shortage.

Electricity security of supply report

Tamara Linnhoff
Privacy of natural persons

ELECTRICITY CAPACITY (for the week to Sunday 5 October)

Capacity residual margins were high for most of last week, except when the residual dropped to 300 MW on the morning of Thursday 2 October. Transpower continues to monitor capacity closely during the spring shoulder season despite decreasing demand. Outages reduced thermal unit commitment, and the possibility of cold snaps or large swings in wind generation mean that capacity can be tight despite much lower peaks than in winter.

The N-1-G margins in the NZGB forecast are healthy through to the end of November 2025:

NZGB Look-Ahead (excluding next 7 days)



Source: System Operator, Market Operations - Weekly Market Movements

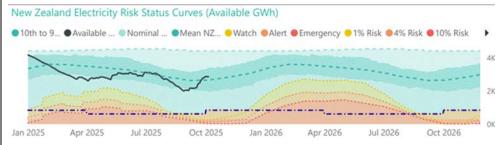
ENERGY (HYDRO) STORAGE RELATIVE TO MEAN (for the week to 5 October)

National hydro storage increased slightly to 108% of the historic mean for this time of year. South Island hydro storage increased from 102% to 104%, while North Island storage decreased from 137% to 132%.

ELECTRICITY ('ENERGY') SUPPLY RISK (at 5 October)

New Zealand controlled energy storage is above average for this time of year. The black curve shows the actual hydro storage and the fields are risk curves:

Dark blue (including dotted blue line) = average for this time of year; Yellow = Watch curve; Orange = alert curve; Dark orange = Emergency curve; Lowest hatched blue line = Available contingent storage.



Source: System Operator, Market Operations - Weekly Market Movements

The System Operator last updated the ERCs on **25 September**, commentary on that update is in the Weekly Report of 6 October 2025. The next ERC update is expected at the end of October.

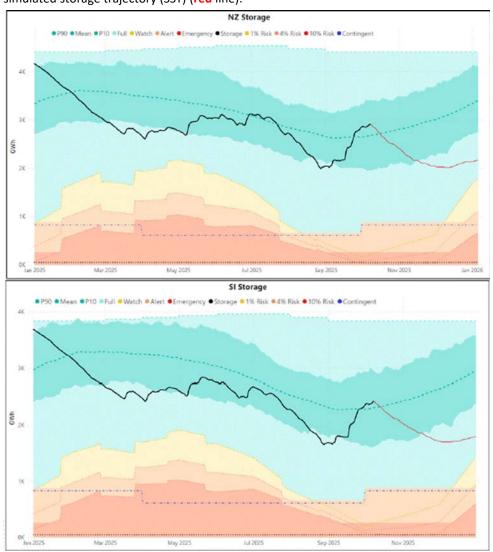
ERCs have lifted for most months in 2026 relative to the August update. This update of the Energy Security Outlook includes the effects of hydro storage at the time, slightly decreased

gas production forecasts relative to Transpower's previous outlook, and the announced retirement of a Huntly Rankine unit in January 2026. If the Rankine is not retired, the risk position for 2026 will improve and only four simulated storage trajectories cross Watch.

The Risk Meter is a dynamic reflection of the current Electricity Risk Status. The Risk Meter shows where current total storage is within these status bands and indicates how close the next status is to being triggered.



To show the number of days until the NZ system hits energy risk curves - if it does not rain - Transpower have extended the actual hydro storage position (black line) along the worst-case simulated storage trajectory (SST) (red line):



The ERCs shown were calculated using input data as of **15 September** (though published in the ERCs on **25 September**). The worst-case SST line was calculated using hydro inflow data starting from **29 September**.

Worst case inflows - Time to cross successive curves

Region	Date Watch	Time to Watch	Date Alert	Time to Alert	Date Emergency	Time to Emergency
NZ	N/A	N/A	N/A	N/A	N/A	N/A
SI	N/A	N/A	N/A	N/A	N/A	N/A

This week the worst-case SST (the red line) no longer crosses the national NZ or South Island Watch curve in 2025. The red line does not cross the Alert curve in 2025, which would be necessary for generators to be able to access contingent storage.





Source: Energy Link, Energy Trendz Weekly

Connections Queue for Generation – improvements to increase project throughput.

CY2025 run rate to start generation investigations (queue) up by 80% on 2024. 43 investigation projects started, 13 projects moved to delivery in 2025 and 8 grid connections completed.

Decrease of 32 projects in queue since January.

Maximum wait time for new applications is ~12 months.

16 new applications received since January (and one cancelled).

Daniel Brown (content supplied by Transpower)

Improving throughput:

Implemented:

- Stage-gating within investigation phase.
- Starting work elements earlier pre-investigation where resources are available (while they wait in queue).
- Published 'Guidelines for new connections' document.
- Connection status information published monthly on Transpowerwebpage. Published short guide to SOSA (for RMA decision-makers) to highlight need to consent and build new renewable generation.
- New CRM system live.
- Guidelines around customer led investigation and delivery substantially completed.
- Concept Solution (preferred connection with acceptance and commercial terms) being used as needed.

Work continuing to investigate/implement:

- Right-sizing investigations to meet customer needs and risk appetite.
- Targeted regional plans, identifying project sequencing and interdependencies to improve efficiency.
- Standard equipment lists now including digital substation for standardised designs for greenfield substations.
- Prioritisation options within the queue, based on security of supply (including how soon generation can commence to meet forecast demand) and other measures.

Resourcing improvements:

 Continuing to work with engineering consultants (ECs) on utilisation, EC's growing their resources and different work award mechanisms for larger and bundled projects.

Considering additional support for resource planning and portfolio optimisation.

Electricity pipeline updates

The Electricity Authority will continue to provide you with monthly updates on the generation pipeline.

Stakeholder Updates

Title

Comment

Transpower Future Grid Blueprint consultation

Daniel Brown
Privacy of natural persons

On Monday 6 October, Transpower launched consultation on '<u>A Future Grid Blueprint for Aotearoa</u>'. Consultation runs to 14 November.

The consultation presents five potential future electricity demand scenarios. These draw on:

- Recent stakeholder engagement on what will be driving our economy in 2050, and
- Economic analysis on how the economy might respond to different growth paths. This finds
 our economy could be up to \$73 billion larger than the current trajectory, if certain
 technologies come to fruition and other aspiration assumptions hold true. The modelling was
 provided by Sense Partners (who modelled the macroeconomic impacts of energy prices to
 support your recent energy package).

Transpower consider that given the challenges and lead times of building new grid infrastructure at scale, it is better to scope the upper end of the potential investment required. If the economy and electricity demand then does not grow as the stronger forecasts, they can slow or defer investments. This will be more beneficial to NZ Inc than trying to accelerate later if the opportunity to deliver benefits from transmission investment had been under-scoped.

The future grid blueprint will guide Transpower in its 'low regrets' investments in the grid; investments that ensure it is affordable, resilient, adaptive and supports the way we need to manage the electricity system across all scenarios. The blueprint will also support industry and those in the energy sector with their long-term planning.

While this consultation is focussed on the future demand for electricity, Transpower also provide some limited early insights on the potential mix of future supply, including the role of decentralised resources across the five scenarios and the capital costs of new generation options. Transpower plan to consult in more detail on the likely generation stack, its analysis methodology, the cost of transmission options and non-network alternatives in future consultations, later this year and early next year.

Transpower Security of Supply Forecasting and Information Policy (SOSFIP) consultation

Tamara Linnhoff
Privacy of natural persons

On Tuesday 7 October Transpower launched consultation on proposed amendments to the Security of Supply Forecasting and Information Policy (SOSFIP), which includes the includes the decision criteria and process governing hydro generators' access to contingent storage. The consultation runs to 4 Nov 2025, with cross submissions by 11 Nov 2025.

The proposals include changing the contingent storage buffer (up from current 50 GWh) to a rolling buffer that is different each month: the base buffer would be 140 GWh, with a higher buffer during July, August and September.

The proposals would materially improve access to contingent storage, but not to the extent requested by Meridian and Contact Energy. The challenge of the 'shadow constraint' is addressed.

Free and frank opinions

Confidential advice to Government

Confidential advice to Government

Meridian and Contact are, separately, seeking changes to respective resource consent conditions under the Fast-track Approvals Act.

Confidential advice to Government

Commercial Information

EA consultations on billing and improving access to product data

Scott Russell

Last week the EA released two consultations on improving access to product data and better billing. The billing proposal looks at improving experiences for consumers by:

- Standardising the content, requiring plain-language and ensuring logical layouts so that bills are easier to understand
- Supporting residential consumers to have the information they need to compare plans across the electricity market
- Supporting consumers to be on the best plan for their needs through prompts to switch to a
 better plan, risk-free time of use pricing adoption and the removal of penalties when
 switching plans within the same retailer, and
- Protecting residential and small business consumers by limiting back bills and reducing bill shocks from estimated meter readings.

Feedback on this consultation closes 5 November.

The product data proposal aims to improve access to product data by:

- extend the existing requirement on retailers to provide information on generally available retail tariffs to also provide information on 'legacy' plans on request
- introduce a unique product identifier system that requires retailers to apply a unique code to every retail plan they offer
- require retailers to provide the applicable product identifier codes to consumers or agents upon request, for the consumer's ICP
- empower the Authority to prescribe an Electricity Information Exchange Protocol (EIEP) for the provision of electricity product information through the Electricity Information Exchange system.

Feedback on this consultation closes 18 November 2025.

EA consultation for export limits on low voltage networks

Stephen Tat

rivacy of natural persor

On 8 October 2025 the Electricity Authority launched their 'export limits' consultation. This consultation proposes four changes to how distributed generation, such as rooftop solar, is treated in the Code by electricity distribution businesses, in order to support greater uptake of solar and batteries on networks. The four changes are:

- a default 10kW export limit for small-scale distributed generation such as household solar
- aligning with Australian settings for how inverters inject that better utilises the expanded voltage range, and supports greater exports
- distributors to use an industry-developed methodology to set bespoke export limits for larger-scale distributed generation
- all distributed generation applications to use the latest inverter performance standard.

Submissions close on 19 November and we understand the EA intends to release a decision paper in March or April 2026.

The proposals in this EA consultation are consistent with your policy intent of maximising consumer benefits from the uptake of distributed energy resources.

15

Energy Resilience and Affordability Conference

Scott Russell Privacy of natural persons On 8 and 9 October 2025 Ara Ake hosted the Energy Resilience and Affordability Conference in Wellington, this is the conference's third year.

Sessions focused on a range of topics including resilience, affordability, collaboration, energy hardship and education. Stakeholders from across the electricity sector attended the conference. We will provide a readout of any notable points to your office as required.

Commercial Information

Tekapo power scheme Fast-track consent

Daniel Brown Privacy of natural persons A Fast-track decision panel is considering the reconsenting of Genesis Energy's Tekapo hydro scheme. The panel has now issued a draft decision approving the application. Comments are now being sought (by 20 October) on the conditions for the consent.

Current appointments

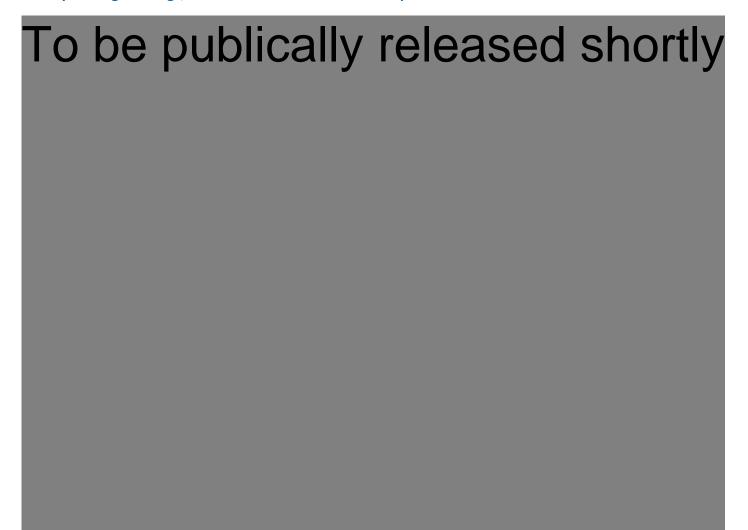
Confidential advice to Government

Upcoming Ministerial Items

1. Upcoming Energy meetings

Meeting date	Meeting	Details
Wednesday 15 October 2025 4:30 pm – 5:15 pm	BEC – Catherine Beard	Joint with Briefing with MfE Due: 13 October 2025 Officials required: Justine Cannon
Thursday 16 October 2025 8:30 am – 9:00 am	Energy Competition Taskforce Ministerial meeting	Briefing Due: N/A Officials required: Paul Stocks, Justine Cannon

2. Upcoming Briefings, Aides Memoires and Cabinet Papers



3. Written Parliamentary Questions

Due to Minister	Number	Member	Question
13 October 2025	48864	Francisco Hernandez	What consultations are the Minister's departments, agencies, crown entities and any other bodies that the Minister is responsible for, if any, planning to open on the week beginning Monday 6 October 2025 with employees around any changes to employment roles, employment numbers and any other employment conditions, and when is any such consultation expected to close?
13 October 2025	48867	Francisco Hernandez	What consultations are the Minister's departments, agencies, crown entities and any other bodies that the Minister is responsible for, if any, planning to open on the week beginning Monday 29 September 2025 with employees around any changes to employment roles, employment numbers and any other employment conditions, and what is the proposed net change in roles?
13 October 2025	48869	Francisco Hernandez	What consultations are the Minister's departments, agencies, crown entities and any other bodies that the Minister is responsible for, if any, planning to open on the week beginning Monday 6 October 2025 with employees around any changes to employment roles, employment numbers and any other employment conditions, and what is the proposed net change in roles?
13 October 2025	48870	Francisco Hernandez	What consultations are the Minister's departments, agencies, crown entities and any other bodies that the Minister is responsible for, if any, planning to open on the week beginning Monday 29 September 2025 with employees around any changes to employment roles, employment numbers and any other employment conditions, and when is any such consultation expected to close?

4. Ministerial Correspondence received

Due date	Tracking number	Correspondent	Summary of Correspondence
16 October 2025	SW25-291	Privacy of natural persons	Metering
16 October 2025	SW25-300	Privacy of natural persons	Pathways for Businesses to decouple from gas usage
21 October 2025	SW25-301	Privacy of natural persons	Electricity Costs
21 October 2025	SW25-302	Privacy of natural persons	Rewiring Aotearoa Manifesto
21 October 2025	SW25-303	Privacy of natural persons	Voltage limits
21 October 2025	SW25-304	Privacy of natural persons	Electricity Generation and Pricing
21 October 2025	SW25-305	Privacy of natural persons	Costs of Residencial Gas
21 October 2025	SW25-306	Privacy of natural persons	Use of Solar to reduce energy bills
21 October 2025	SW25-307	Privacy of natural persons	Solar and Wind Farm Consents





Energy Portfolio Weekly Report

Week commencing:	20/10/2025	Priority:	Medium
Security classification:	In Confidence	Tracking number:	BRIEFING-REQ-0022432
Recipient		Action sought	
HON SIMON WATTS		Note the contents of	this report
MINISTER FOR ENERGY			

Justine Cannon **General Manager**Energy Markets Branch

Ministry of Business, Innovation and Employment



17 October 2025

Minister's comments:

Energy Portfolio Officials' Meeting Agenda 11:10 am – 11:55 am Tuesday 21 October 2025

Item	Subject	People	Oral Item / Paper #	Action Required
1.	2 + 2	Stephen Tat Sam Buckle	Oral	Discussion
2.	Expert Advisor Panel (2.5 Dry Year Cover)	Tamara Linnhoff	BRIEFING-REQ- 0022212	Discussion
3.	Weekly Report & Work Programme	Minister	Oral	Discussion
4.	Any other business	All	Oral	Discussion

Ministry of Business, Innovation & Employment officials attending:

Name	Position
Suzanne Stew	(Acting) Chief Executive and Secretary
Justine Cannon	General Manager, Energy Markets
Rebecca Heerdegen	Policy Director, Energy Markets
Stephen Tat	(Acting) Director, Innovation and International
Tamara Linnhoff	Manager, Electricity Markets Policy
Sam Buckle	Deputy Secretary, Ministry for the Environment

Action and outcome	Updates	Status and upcoming milestones
	Priority One: Energy Gap	
Electricity Market Review Independent review to advise on the impact of market structure, design, and rules on the electricity systems' performance The Government's Energy Package was announced on Wednesd October. We have attached an overview of the programme of w deliver the Energy Package. Regular reporting will be provided in weekly report.		On track Report-backs to Cabinet in December 2025 and Q1 2026
Confider	ntial advice to Govern	nment
Procurement process for LNG Import Facility Services (1.1)	This week we ran two supplier briefings for interested parties. The purpose of the sessions was to cover the high-level details of the procurement process and answer any questions. We had a total of 123 participants across the two sessions (this figure includes 9 individuals who came to both briefings). We have identified our preferred international legal counsel. We are currently working through the contractual agreement. We continue to develop the wider options analysis to support Cabinet decisions in December on whether to proceed with LNG, and whether an accelerated delivery option could be suitable.	On track Report-back to Cabinet in December
A Stronger Electricity Authority (2.2)	We met with you on 15 October to present our proposed approach and hear your thoughts. Confidential advice to Government We have provided you with a briefing on 16 October that confirms the	On track Report-back to Cabinet in December
	proposed approach including the matters that you raised on 15 October. This will be followed by more detailed advice and a draft Cabinet paper in November 2025.	
Crown energy PPAs (1.3) Exploring the use of government energy demand to support development of energy projects	On 1 October 2025 NZGP released the Request for Information seeking responses from businesses with potential energy projects that would add to electricity and/or (non-transport) fuel supply. Separately, Health NZ is preparing to release a Request for Proposal for the procurement of offsite sleeved PPAs as well as alternative long-term supply arrangements to supply up to 10% of its electricity volume. This initiative is part of a hybrid procurement strategy, with the remaining 90% of electricity supply being secured through the NZGP managed All-of-Government electricity contract. NZGP has been connected to this work and will continue to be involved supporting Health NZ.	On track Request for Information closes 12 November
Improving gas market transparency (2.4)	Workstream 1: More timely annual reserves and forecast information On 15 October 2025, Resources officials briefed you and Minister Jones on a proposal to bring forward the due date for Annual Summary Reporting from 31 March to 1 March, starting in 2026 (BRIEFING-REQ- 0020568). The briefing requested your decision by 22 October 2025 and asked that the associated draft Cabinet paper be shared for Ministerial consultation by 24 October 2025. Subject to your feedback and the consultation, Resources officials aim to lodge the Cabinet paper by 6 November 2025 for consideration by the Cabinet Legislation Committee on 13 November 2025.	On track Report back in November

Additional gas market information

No change: On 6 October 2025, we started targeted consultation on potential additional gas market information we may request from market participants. We have asked for submissions by 7 November 2025. Feedback from this consultation will inform a voluntary information request, which we plan to issue by the end of Q1 2026 at the latest.

Confidential advice to Government

Wood Energy Strategy Investigating barriers to the development of the domestic supply chain and export opportunities for wood bioenergy.	Following your feedback, we have made changes to the Wood Energy Strategy and supporting Action Plan and included three case studies to reflect industry's contribution to wood energy. We have provided you with an event briefing and speech ahead of the Residues2Revenues conference on 22 October where you will release the Wood Energy Strategy and associated Action Plan. The Biogas Policy Statement will also be released at the Residues2Revenues conference.	On track Strategy and Action Plan to be publicly released on 22 October.
Modelling work on economic impacts of declining gas supply	We have now selected a supplier to complete a study into the impact of declining gas supply on the New Zealand economy, with an aim to understand sectoral, regional, and national economic impacts of industrial gas price increases. This will help to inform further policy work on potential options to manage the effects of our declining gas supply, including the LNG business case.	On track

Confidential advice to Government

Confidential advice to Government

Electricity and Gas Safety Standards (including permitted voltage range)	The Cabinet agreed to the new amendment regulations on 13 October, for gazettal on 16 October. The regulations will take effect on 13 November 2025 (allows for 28 Day Rule).
Updating 400+ references	MBIE published a news item on its website on 16 October notifying
to international standards in	these changes and the energy efficiency product regulations that were

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On track

Regulations agreed to by Cabinet and will take effect from 13 November

the *Electricity (Safety)*

Regulations 2010 and the Gas (Safety and Measurement) Regulations 2010. This includes new standards for solar and EV chargers, reducing costs

also gazetted on 16 October. We will inform our stakeholders via email and LinkedIn.

Confidential advice to Government

Priority Three: EDB Efficiency and reliability

EDB efficiency and networking pricing/connections (2.6)

Work across MBIE and regulators to improve EDB performance and efficiency

Standardisation and collaboration

The letter of expectation to EDBs was sent on Monday 6 October. We are working with Electricity Networks Aotearoa (ENA) to run a webinar on 20 October for EDBs to ask questions about the letter and clarify what you may expect in their response.

The procurement process is underway for an expert to provide independent recommendations to improve EDB standardisation and collaboration. The RFQ was sent to selected consultants on 2 October, and the deadline for responses was 16 October.

On track

EA Code changes come into effect over various dates from April 2026 Letter to EDBs sent on 6 October

Confidential advice to Government

Relevant work at the Electricity Authority

The Authority has a number of workstreams underway relating to EDB connection processes and pricing.

Connection prices

In July 2025, the EA decided on four new connection pricing requirements:

- EDBs must set prices with reference to a 'least cost technical solution' – ie letting the customer agree to a cheaper option than otherwise may be proposed
- EBDs must develop a policy on 'pioneer schemes' ensuring applicants who fund a network extension receive rebates from those who follow and utilise the same network.
- EDBs must, on request, provide a standardised breakdown of their quoted connection charges into specific, defined components
- If an EDB charges for capacity costs, it must do so using published rates which reflect the average cost of adding network capacity, rather than the entire cost of an upgrade being allocated to the customer happening to trigger the upgrade.

The EA is further considering decisions on:

 Reliance limits – which restrict how much electricity distributors could recover from up-front connection charges; and The obligation on distributors to connect all applications that meet certain criteria.

Connection processes

The EA has also made decisions on Code changes in relation to EDB connection processes:

- An amended application process for larger distributed generation – to be better deal with speculative projects in the connection queue
- A new application process for larger load projects creating greater consistency across EDBs
- Requiring EDBs to publish pipeline information for large upcoming load/generation connections
- Requiring EDBs to provide more information on network capacity.

The EA has also commenced consultation on proposals around solar export limits and power bill standardisation.

Confidential advice to Government

Priority Four: Offshore Wind

Offshore Renewable Energy

No change: Cabinet agreed changes to the offshore renewable energy legislation on 15 September. We have issued drafting instructions to PCO for preparation of an amendment paper.

Confidential advice to Government

Confidential advice to Government

In the meantime,

we will continue to work on the amendment paper, secondary legislation, round notice and implementation planning so the first round can be opened shortly after the Bill passes. We are running targeted consultation with offshore wind and seabed mining developers to test how the changes to the legislation can work in practice.

Delayed

The timing of next steps is contingent on the timeframes to amend and finalise the Bill

Other (MBIE Energy branch) workstreams

Hydrogen regulations

Delivering Hydrogen Action Plan commitment to amend safety regulations to enable hydrogen No Change: Consultation on Enabling Hydrogen: technical changes to safety regulations closed on Monday, 21 July 2025 and we have received 11 submissions.

We are now analysing submissions in conjunction with Health and Safety policy officials and WorkSafe NZ. Confidential advice to Government

On track

New Zealand Energy We will provide you with a briefing in late October 2025, including the Delayed **Efficiency and Conservation** work completed on the NZEECS to date and options for your Strategy (NZEECS) consideration Confidential advice to Government Develop a refreshed We will not strategy that meets advance any further work on this until we receive your direction. legislative requirements. **Consumer Data Right** No change: MBIE is progressing with advice on issues raised in **Delayed** submissions on proposals for an electricity sector Consumer Data Right. Deliver a CDR for the We have provided you a electricity sector briefing on consultation. **Implementing Electrify NZ** Consultation on updated RMA national directions, including renewable electricity and electricity networks direction, has closed. The Minister Resource managementfor RMA Reform has consulted you on final proposed changes to reforms to support energy-related RMA national policy statements – these are intended to investment in energy be in place by the end of 2025. Confidential advice to Government projects The Resource Management (Consenting and Other System Changes) Amendment Bill has now entered into law. This Bill implemented some Electrify NZ proposals including one-year consent decisions for energy projects, and default 35-year consent durations. We understand the Minister for RM Reform will soon consult other Ministers on the proposed RMA replacement legislation. Confidential advice to Government **Energy Efficiency and Conservation (Energy** Flexibility and Regulatory Improvements) **Amendment Bill** Market Enhancements via Energy Competition Task Force (EA and Commerce Commission) **Energy Competition** On track 1B Standardised flexibility contracts: **Taskforce** No change: On 19 August, the EA commenced consultation on an 'Issues Joint EA and Commerce and Options' paper on standardised flexibility contracts. The paper Commission investigation of confirms EA concerns that current trading volumes are shallow and options to improve must improve. They propose voluntary trading continues and outlines

1C+D level playing field measures: On 14 October the EA released a c

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and costs

On 14 October the EA released a consultation paper for the draft Code amendments to implement its 'in principle' **non-discrimination obligations**. The EA has revised its approach following feedback on its draft consultation paper earlier this year. It views its new proposal as a

options for mandatory trading of minimum volumes, if liquidity doesn't

improve. The threshold to move to mandatory trading will be two

consecutive quarters, from January 2026, of trading falling below defined levels. If mandatory trading is required, it will be ready to be in

place by mid-2026. Consultation closed on 30 September.

more practical approach that is faster to implement and easier to enforce. Consultation closes on 25 November 2025. Subject to consultation, the EA aims to have the amended Code in place in early 2026 with the obligations commencing on 1 July 2026.

The EA also confirmed it will start a **review of commercial market making.** Confidential advice to Government

 ${\it 2D Better compensating industrial flexibility (demand response):}\\$

No change: On 28 May 2025 the EA published its 'Roadmap for industrial demand flexibility'. The EA consulted during August on an issues paper relating to an industrial flexibility emergency reserve scheme. It is now considering submissions.

Regular reporting

Title

Comment

Potential commercial deals to enhance winter security of supply

 Industry actions to improve security of supply via Huntly contracts *No change:* On 30 September, the Commerce Commission released its draft determination on the proposed arrangement between the four gentailers to create a Huntly Strategic Energy Reserve. The Commission found that the arrangements will likely result in a net public benefit and provisionally considers it appropriate to authorise the arrangement.

The Commission considers it likely that, in the absence of this arrangement, Rankine Unit 2 would retire in early 2026. Therefore, the Commission considers that the arrangement will result in the following benefits:

- Improved security of supply, particularly during dry winters
- Lower wholesale prices and/or reduced volatility
- 135 MW of additional unallocated capacity being made available as hedge cover to a wider range of interested parties.

The Commission views that any detriments are likely to be minimal – unlikely to facilitate enhanced coordination or increase the ability to exercise market power.

This decision by the Commission is a draft determination. Interested parties will have an opportunity to submit their views on the Commission's findings before a final decision is made.

The Commission was not explicit on when it will deliver its final decision. Its statutory deadline for a decision is 16 February 2026. However, we understand that a final decision is likely to be made before this (potentially in November).

Gas security of supply report

Dominic Kebbell
Privacy of natural persons

On 14 October 2025, Enerlytica published its analysis of third-quarter gas production and forecasts for the fourth quarter of 2025. Enerlytica's report noted that most major gas fields performed in line with expectations for the third quarter, except for Maui, which declined more sharply than anticipated.

Commercial Information

Electricity security of supply report

Tamara Linnhoff
Privacy of natural persons

ELECTRICITY CAPACITY (for the week to Sunday 12 October)

The capacity residual margins were high for most of last week, except for when residual dropped to 304 MW on the morning of Monday 6 October. This was the highest demand peak for the week and coincided with a period of low wind generation.

The N-1-G margins in the NZGB forecast are healthy through to early December 2025:

NZGB Look-Ahead (excluding next 7 days)



Source: System Operator, Market Operations - Weekly Market Movements

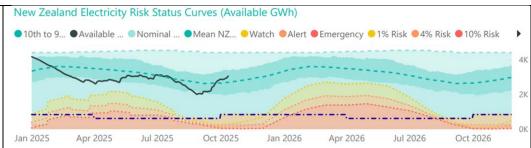
ENERGY (HYDRO) STORAGE RELATIVE TO MEAN (for the week to 12 October)

National hydro storage levels increased to 115% of the historic mean from 108% the week prior. South Island hydro storage increased from 104% to 112% of historic mean and North Island storage increased from 132% to 135%.

ELECTRICITY ('ENERGY') SUPPLY RISK (at 12 October)

New Zealand controlled energy storage is above average for this time of year. The black curve shows the actual hydro storage and the fields are risk curves:

Dark blue (including dotted blue line) = average for this time of year; Yellow = Watch curve; Orange = alert curve; Dark orange = Emergency curve; Lowest hatched blue line = Available contingent storage.



Source: System Operator, Market Operations - Weekly Market Movements

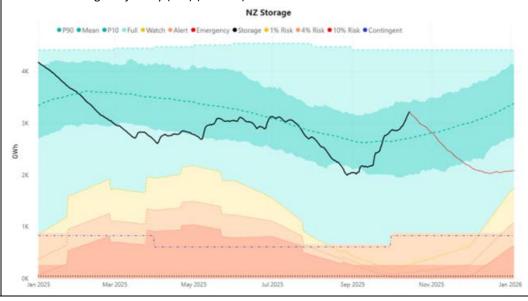
The System Operator last updated the ERCs on **25 September**, commentary on that update is in the Weekly Report of 6 October 2025. The next ERC update is expected at the end of October.

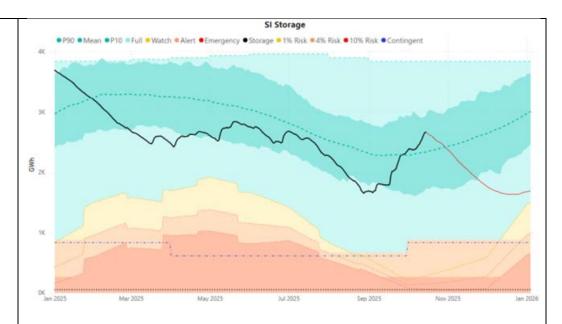
ERCs have lifted for most months in 2026 relative to the August update. This update of the Energy Security Outlook includes the effects of hydro storage at the time, slightly decreased gas production forecasts relative to Transpower's previous outlook, and the announced retirement of a Huntly Rankine unit in January 2026. If the Rankine is not retired, the risk position for 2026 will improve and only four simulated storage trajectories cross Watch.

The Risk Meter is a dynamic reflection of the current Electricity Risk Status. The Risk Meter shows where current total storage is within these status bands and indicates how close the next status is to being triggered.



To show the number of days until the NZ system hits energy risk curves - if it does not rain - Transpower have extended the actual hydro storage position (black line) along the worst-case simulated storage trajectory (SST) (red line):





The ERCs shown were calculated using input data as of **15 September** (published **25 September**). The worst-case SST line was calculated using hydro inflow data starting from **29 September**.

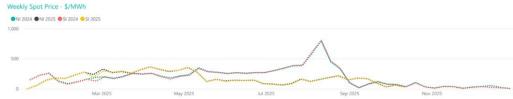
Worst case inflows - Time to cross successive curves

Region	Date Watch	Time to Watch	Date Alert	Time to Alert	Date Emergency	Time to Emergency
NZ	N/A	N/A	N/A	N/A	N/A	N/A
SI	N/A	N/A	N/A	N/A	N/A	N/A

This week the worst-case SST (the **red** line) does not cross the national NZ or South Island Watch curve in 2025. The red line does not cross the Alert curve in 2025, which would be necessary for generators to be able to access contingent storage.

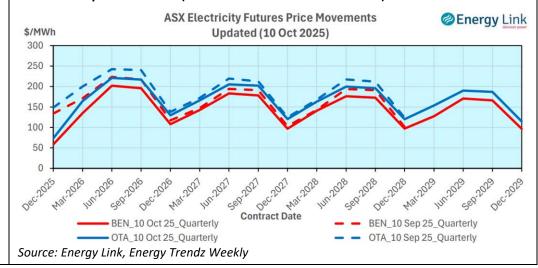
WHOLESALE ELECTRICITY PRICES

Weekly Spot Price (week ended 12 October 2025)



Source: System Operator, Market Operations - Weekly Market Movements

ASX Electricity Futures Prices (as at last available 10 October 2025)



Transpower's Connections Queue for Generation – improvements to increase project throughput

Daniel Brown
Privacy of natural persons

Queue update

CY2025 run rate to start generation investigations (queue) up by 80% on 2024. 44 investigation projects started, 15 projects moved to delivery in 2025 and 8 grid connections completed.

Across both generation and non-generation projects:

- Decrease of 29 projects in queue since January. Maximum wait time for new applications is ~10 months.
- 20 new applications received since January (and one cancelled and one merged).

Improving throughput:

Implemented:

- Stage-gating within investigation phase.
- Starting work elements earlier pre-investigation where resources are available (while they wait in queue).
- Published 'Guidelines for new connections' document.
- Connection status information published monthly on our webpage. Published short guide to SOSA (for RMA decision-makers) to highlight need to consent and build new renewable generation.
- New CRM system live.
- Guidelines around customer led investigation and delivery substantially completed.
- Concept Solution (preferred connection with acceptance and commercial terms) being used as needed.
- Transpower continuing to actively manage the queue: 20 projects are currently "on hold" while developers arrange their project financing and consenting; meanwhile we have re-started several projects previously put on hold. This enables us to focus resources on projects that are able to progress.

Work continuing to investigate/implement:

- Right-sizing investigations to meet customer needs and risk appetite.
- Targeted regional plans, identifying project sequencing and interdependencies to improve efficiency.
- Standard equipment lists now including digital substation for standardised designs for greenfield substations.
- Prioritisation options within the queue, based on security of supply (including how soon generation can commence to meet forecast demand) and other measures.

Resourcing improvements:

- Continuing to work with engineering consultants (ECs) on utilisation, EC's growing their resources and different work award mechanisms for larger and bundled projects.
- Considering additional support for resource planning and portfolio optimisation.

Electricity pipeline updates

Daniel Brown
Privacy of natural persons

The Electricity Authority will continue to provide you monthly updates.

Solar numbers update

Stephen Tat Privacy of natural persons The table below shows the total number of ICPs and MW capacity in New Zealand of solar systems less than 10kW for the month of September 2025, and the previous month for comparison. The data is drawn from the Electricity Authority's public Electricity Market Information (EMI) website.

We note the drop in solar ICP numbers. We are following with the Electricity Authority to explain the reasons, and we will report back to you once we hear back from them.

Category (solar system size: less than and equal to 10 kW)	ICP number	MW capacity	ICP number	MW capacity
	Month ending 31 August 2025		Month ending 30 September 2025	
Residential solar (all)	63,395	310.448	63,340	310.301
Residential solar (with battery)	9,655	56.137	9,651	56.125
Small, Medium Enterprises solar (all)	2,215	13.144	2,207	13.108
Small, Medium Enterprises solar (with battery)	189	1.250	191	1.260
Commercial solar (all)	1,457	8.669	1,459	8.671
Commercial solar (with battery)	86	0.566	86	0.564
Total (solar all)	67,067	332.261	67,006	332.080
Total (solar with battery)	9,930	57.953	9,928	57.949

Energy and Climate Change Ministerial Council (ECMC) meeting in December in Canberra



You have been invited to the Energy and Climate Change Ministerial Council (ECMC) meeting on Tuesday 16 December in Canberra. Your RSVP is requested by 22 October.

The ECMC is a Ministerial forum for the Australian and New Zealand governments to work together on priority issues of national significance and key reforms in the energy and climate change sectors. This includes the E3 Programme, a joint initiative between Australia and New Zealand that develops proposals to increase equipment energy efficiency.

The ECMC meeting will include a vote on key E3 Programme items (detailed further in upcoming joint MBIE-EECA advice to you). There are options for your attendance and vote:

- attend in person
- attend online
- vote in absentia in advance of the meeting (recommended).

You will have the opportunity to connect with the Australian Minister for Climate Change and Energy at the 2+2 Climate and Finance Dialogue which is due to take place in Queenstown later this year. The New Zealand and Australian Finance Ministers will also attend the 2+2 meeting.

MBIE recommends you:

Agree to vote in absentia in advance of the meeting

Agree / Disagree

Note, subject to your decision, we will return the registration form to the ECMC Secretariat which is due on 22 October.

Stakeholder Updates

Title	Comment		
EDB changes to accommodate more solar connections	Two EDBs have recently announced changes to support more solar connections on their networks		
Stephen Tat Privacy of natural persons	Northpower has announced they are increasing their solar export limit from 5kW to 10kW for single-phase connections. They state this is due to MBIE's decisions on expanding the permitted voltage range as well as increased visibility of their own network from investing in smart-meter data.		
	WEL Networks has just launched an automated system for approving solar and battery connections, meaning systems up to 10kW with specified inverters are automatically approved. WEL do not have a fixed export limit, and have also removed their \$100 approval fee. WEL are also utilising smart meter data to support implementation.		
Commerce Commission	The Commerce Commission has determined to issue warnings to:		
enforcement action Daniel Brown Privacy of natural persons	 GasNet, for breaches of its price quality path in 2020 and information disclosure requirements in 2020-22. In summary, GasNet overcharged some customers, made mistakes in its information disclosure, and had insufficient business processes in place to catch such errors; and 		
	 Powerco for an admitted breach of quality standards in its customised price/quality path in 2023. In summary, Powerco did not meet quality standards for power supply interruptions to its customers. 		
	In both cases the Commission determined that a warning was appropriate because of (amongst other things) the extent of the harm, the relative seriousness of the conduct, and the public interest in enforcement action in each case. In GasNet's case there is an expectation that it repays the (small) 2020 overcharge to consumers or the community.		
Genesis, Meridian and	Genesis and Meridian both reported expected growth in earnings for Q1 FY26		
Contact – Q1 FY26 updates	Genesis Energy		
Tamara Linnhoff Privacy of natural persons	On 14 October, Genesis announced it was increasing its FY26 EBITDAF guidance range from the forecasted \$430m - \$460m to \$455m - \$485m.		
	This is due to:		
	Strong operational performance as a result of high water levels: At 13 Oct 2025 Genesis' Lake Tekapo hydro scheme storage was equivalent to 407 gigawatt-hours of generation, or 53% of maximum.		
	 An extension of the usual shutdown period of the gas-fired unit 5 at Huntly from one month to three-months: The three-month shutdown period is expected to free up 3PJ of gas. The gas has been sold to industrial consumers including Ballance Agri-Nutrients. 		
	Genesis will release its Q1 FY26 operational report later this month.		
	Meridian Energy		
	On 14 October, Meridian released its monthly operating report for September.		
	It also signaled strong performance due to:		
	 High rainfall, an increased snowpack, and record wind generation: Inflows into the Waiau catchment last month were more than twice the historic average, with above- average inflows continuing this month. In addition, the Waitaki catchment snowpack has materially increased over the last six to eight weeks. Further, the Meridian wind fleet generated an excess of 200 gigawatt-hours over the past month for the first time. 		
	Retail growth through the acquisition of Flick Electric (13 May 2025): The inclusion of acquired Flick Electric customer numbers has increased its customer base by 21%.		
	Contact Energy		
	On 16 October, Contact Energy released its monthly operating report for September.		
	Contact signalled strong performance with a \$56m Q1 FY26 EBITDAF uplift due to:		
	 Above-average hydro inflows in the Clutha catchment: Inflows into the Clutha catchment last month were +20% ahead of average, with above-average inflows 		

- expected in the near-term forecast. This enabled Contact to reduce output from its thermal plant and lower generation costs.
- Acquisition of Manawa Energy (11 July 2025): The Manawa Energy acquisition
 contributed ~72% / \$40 million of the Q1 FY26 EBITDAF uplift. The integration of
 Manawa Energy is expected to continue to drive growth as further synergies are
 realised.

Current appointments

Upcoming Ministerial Items

1. Upcoming Energy meetings

Meeting date	Meeting	Details
Tuesday 21 October 2025	Amazon Web Services	Briefing Due: 16 October 2025
5:30 pm – 6:00 pm		Officials required: Tamara Linhoff
Wednesday 22 October 2025	Residues to Revenues Conference	Speech due: 9 October 2025
9:45 am – 10:15 am		Briefing Due: 16 October 2025
		Officials required: Scott Russell, Amelie Goldberg
Wednesday 22 October 2025	Carbona and CIP	Briefing Due: 20 October 2025
10:30 am – 11:00 am		Officials required: MPI or MfE official (TBC), Scott Russell
Thursday 23 October 2025	EA (fortnightly meeting)	Briefing Due: N/A
12:00 pm – 12:30 pm		Officials required: Justine Cannon
Thursday 23 October 2025	Comcom (fortnightly meeting)	Briefing Due: N/A
12:30 pm – 12:50 pm		Officials required: Justine Cannon
Thursday 23 October 2025	Transpower (fortnightly meeting)	Briefing Due: N/A
12:50 pm – 1:10 pm		Officials required: Justine Cannon
Thursday 23 October 2025	Special Debate Energy	Briefing Due: 16 October 2025
5:00 pm – 6:00 pm		Officials required: N/A
Friday 24 October 2025	European Union – New Zealand	Briefing Due: 14 October 2025
11:35 am – 12:05 pm	Business Summitt	Officials required: N/A

2. Upcoming Briefings, Aides Memoires and Cabinet Papers

To be publically released shortly

To be publically released shortly

3. Written Parliamentary Questions

Due to Minister	Number	Member	Question
20 October 2025	49968	Francisco Hernandez	How much Time off in Lieu, if any, was accrued by employees in the Minister's departments, crown entities and any other bodies that the Minister is responsible for, if any, as of 1 October 2024?
20 October 2025	49971	Francisco Hernandez	How much Time Off In Lieu, if any, has been accrued by employees in the Minister's departments, crown entities and any other bodies that the Minister is responsible for, if any, as of 1 October 2025?

4. Ministerial Correspondence received

Due date	Tracking number	Correspondent	Summary of Correspondence
21 October 2025	SW25-301	Privacy of natural persons	Electricity Costs
21 October 2025	SW25-302	Privacy of natural persons	Rewiring Aotearoa Manifesto
21 October 2025	SW25-303	Privacy of natural persons	Voltage limits
21 October 2025	SW25-304	Privacy of natural persons	Electricity Generation and Pricing
21 October 2025	SW25-305	Privacy of natural persons	Costs of Residencial Gas
21 October 2025	SW25-306	Privacy of natural persons	Use of Solar to reduce energy bills
21 October 2025	SW25-307	Privacy of natural persons Solar and Wind Farm Consents	
4 November 2025	SW25-308	Privacy of natural persons	Electricity charges
4 November 2025	SW25-309	Privacy of natural persons	Power prices
4 November 2025	SW25-310	Privacy of natural persons	Government assistance move off gas to electricity
4 November 2025	SW25-311	Privacy of natural persons	Renewable energy
4 November 2025	SW25-312	Privacy of natur	Electricity reforms
4 November 2025	SW25-313	Privacy of natural perso	Solar in schools

4 November 2025	SW25-315	Privacy of natural persons	LNG
11 November 2025	SW25-316	Privacy of natural persons	Solar carports and solar panels
11 November 2025	SW25-317	Privacy of natural persons	Battery storage
11 November 2025	SW25-317	Privacy of natural persons	Entrust dividend

5. Overview of Energy Package Programme







Energy Portfolio Weekly Report

Week commencing:	28/10/2025	Priority:	Medium
Security classification:	In Confidence	Tracking number:	BRIEFING-REQ-0022783
Recipient		Action sought	

HON SIMON WATTS
MINISTER FOR ENERGY

Note the contents of this report

Justine Cannon **General Manager**Energy Markets Branch

Ministry of Business, Innovation and Employment



24 October 2025

Minister's comments:

Energy Portfolio Officials' Meeting Agenda 9:30am – 10:00am Tuesday 28 October 2025

Item	Subject	Subject People		Action Required
1.	Energy Package: 1.3 Supercharge renewable energy 2.1 Sovereign risk	Daniel Brown Rebecca Heerdegen	Oral	Discussion
2.	Weekly Report & Work Programme	Minister	Oral	Discussion
3.	Any other business	All	Oral	Discussion

Ministry of Business, Innovation & Employment officials attending:

Name	Position	
Suzanne Stew	(Acting) Chief Executive and Secretary	
Paul Stocks	Deputy Secretary, Building, Resources and Markets	
Rebecca Heerdegen	Policy Director, Energy Markets	
Daniel Brown	Manager, Electrify NZ	

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Energy Package tracker (MBIE)

Action and outcome	Updates	Upcoming milestones
	WORKSTREAM ONE: Invest in Energy Security	
1.1 Liquified Natural Gas (LNG Import Facility)	We continue to work through the contractual agreement with our international legal counsel. The Request for Proposals for international technical services closed on Friday 24 October. We will provide further updates on this next week. We continue to develop the wider options analysis to support Cabinet decisions in December on whether to proceed with LNG, and whether an accelerated delivery option could be suitable. Confidential advice to Government	On track Report-back to Cabinet in December
1.2 Mixed Ownership Model Investment Treasury led	Ministers of Finance and SOEs have written to MOMs. The Treasury will advise as and when MOMs provide proposals.	On track Monitoring
1.3 Leverage All of Government (AoG) Demand	On 1 October 2025 NZGP released the Request for Information seeking responses from businesses with potential energy projects that would add to electricity and/or (non-transport) fuel supply. MBIE officials heard at the Residues2Revenues conference that there is interest from the wood energy sector in submitting proposals for the RFI. MBIE have also met with some interested parties around wind, solar and geothermal projects. We will provide you with a high-level summary of submissions received the week of 17 November.	On track Request for Information closes 12 November
1.4 Supercharge Renewable Energy	Offshore Renewable Energy: Cabinet agreed changes to the offshore renewable energy legislation on 15 September. We have issued drafting instructions to PCO for preparation of an amendment paper. Confidential advice to Government In the meantime, we will continue to work on the amendment paper, secondary legislation, round notice and implementation planning so the first round can be opened shortly after the Bill passes. We are running targeted consultation with offshore wind and seabed mining developers to test how the changes to the legislation can work in practice.	Delayed Confidential advice to Governmen The timing of next steps is contingent on the timeframes to amend and finalise the Bill
	Implementing ElectrifyNZ (MFE led): Consultation on updated RMA national directions, including renewable electricity and electricity networks direction, has closed. The Minister for RMA Reform has consulted you on final proposed changes to energy-related RMA national policy statements – these are intended to be in place by the end of 2025. Confidential advice to Government The Resource Management (Consenting and Other System Changes) Amendment Bill has now entered into law. This Bill implemented some Electrify NZ proposals including one-year consent decisions for energy projects, and default 35-year consent durations. We understand the Minister for RM Reform will soon consult other Ministers on the proposed RMA replacement legislation.	On track RMA replacement legislation to be introduced in late 2025 Updated NPS to be in place by end of 2025

	WORKSTREAM TWO: Building stronger markets	
2.1 Sovereign Risk	On 16 October we provided a briefing on engaging with the energy sector on sovereign risk for investment in firming [BRIEFING-REQ-0022438]. You agreed to the engagement plan set out in the briefing. We are meeting with energy stakeholders through to 31 October. The purpose of the meetings is to identify opportunities for investment in firming and the ways in which Government could address sovereign risk barriers to that investment. Confidential advice to Government	On track Briefing in November Report-back to Cabinet in December
2.2 Strengthening the Electricity Authority	On 17 October we provided a briefing recommending key policies, followed by discussion at Energy Officials on 21 October, at which you indicated agreement with all but one recommendation. We await a signed copy of that briefing. We have followed up to ask Minister Jones' office if he may have any feedback. We are on track to provide you with a briefing and draft Cabinet paper in late November. Confidential advice to Government	On track Report-back to Cabinet in December
2.3 Electricity Market Transparency & Efficiency EA led, includes the Energy Competition Task Force workstreams Package 1, and 2D	IB Standardised flexibility contracts No change: On 19 August, the EA commenced consultation on an 'Issues and Options' paper on standardised flexibility contracts. The paper confirms EA concerns that current trading volumes are shallow and must improve. They propose voluntary trading continues and outlines options for mandatory trading of minimum volumes, if liquidity doesn't improve. The threshold to move to mandatory trading will be two consecutive quarters, from January 2026, of trading falling below defined levels. If mandatory trading is required, it will be ready to be in place by mid-2026. Consultation closed 30 September. 1C+D level playing field measures No change: On 14 October the EA released a consultation paper for the draft Code amendments to implement its 'in principle' non-discrimination obligations. The EA has revised its approach following feedback on its draft consultation paper earlier this year. It views its new proposal as a more practical approach that is faster to implement and easier to enforce. Consultation closes on 25 November 2025. Subject to consultation, the EA aims to have the amended Code in place in early 2026 with the obligations commencing on 1 July 2026. The EA also confirmed it will start a review of commercial market making. Confidential advice to Government	On track
0.4 Coo Market	2D Better compensating industrial flexibility (demand response) No change: On 28 May 2025 the EA published its 'Roadmap for industrial demand flexibility'. The EA consulted during August on an issues paper relating to an industrial flexibility emergency reserve scheme. It is now considering submissions.	
2.4 Gas Market Transparency	More timely annual reserves and forecast information On 15 October 2025, Resources officials briefed you and Minister Jones on a proposal to bring forward the due date for Annual Summary Reporting from 31 March to 1 March, starting in 2026 (BRIEFING-REQ-0020568). Following agreement on the proposal by you and Minister Jones, Minister Jones' office is currently undertaking Ministerial consultation on the associated draft Cabinet paper. Subject to the consultation, the Cabinet paper will be lodged by 6 November for consideration by the Cabinet Legislation Committee on 13 November 2025.	On track Report back in November

4

Additional gas market information

No change: On 6 October 2025, we started targeted consultation on potential additional gas market information we may request from market participants. We have asked for submissions by 7 November 2025. Feedback from this consultation will inform a voluntary information request, which we plan to issue by the end of Q1 2026 at the latest.

2.5 Dry Year Regulatory Framework

Confidential advice to Government

2.6 Electricity Distribution Business Efficiency

Standardisation and collaboration

The letter of expectation to EDBs was sent on Monday 6 October. MBIE met with EDB Chief Executives on 20 October to answer questions about the letter and clarify what you may expect in their response.

We are in the last stages of the procurement process for an expert to provide independent recommendations to improve EDB standardisation and collaboration. We expect to confirm the supplier this week.

Confidential advice to Government

On track

EA Code changes come into effect over various dates from April 2026.

Letter to EDBs sent on October 6

Relevant work at the Electricity Authority

The Authority has a number of workstreams underway relating to EDB connection processes and pricing.

Connection prices

In July 2025, the EA decided on four new connection pricing requirements:

- EDBs must set prices with reference to a 'least cost technical solution' – ie letting the customer agree to a cheaper option than otherwise may be proposed
- EBDs must develop a policy on 'pioneer schemes' ensuring applicants who fund a network extension receive rebates from those who follow and utilise the same network.
- EDBs must, on request, provide a standardised breakdown of their quoted connection charges into specific, defined components
- If an EDB charges for capacity costs, it must do so using published rates which reflect the average cost of adding network capacity, rather than the entire cost of an upgrade being allocated to the customer happening to trigger the upgrade.

The EA is further considering decisions on:

- Reliance limits which restrict how much electricity distributors could recover from up-front connection charges; and
- The obligation on distributors to connect all applications that meet certain criteria.

Connection processes

The EA has also made decisions on Code changes in relation to EDB connection processes:

- An amended application process for larger distributed generation to be better deal with speculative projects in the connection queue
- A new application process for larger load projects creating greater consistency across EDBs

- Requiring EDBs to publish pipeline information for large upcoming load/generation connections
- Requiring EDBs to provide more information on network capacity.

The EA has also commenced consultation on proposals around solar export limits and power bill standardisation.

Confidential advice to Government

Other portfolio priorities tracker (MBIE)

Action and outcome	Updates							
	Additional Gas Work							
Alternative Fuel/Energy	Wood Energy Strategy You released the Wood Energy Strategy and the Biogas Statement at the Residues2Revenues conference this week. EECA's RFP for Wood biomass aggregation facility projects launched on 23 October 2025 and closes in January 2026. We will now pause reporting on wood energy work until 2026, unless there are new actions or significant changes to report back on.		On track Released on 22 October					
	Biogas Statement You released the Government Statement on Biogas alongside the Wood Energy Strategy at the Residues2Revenues conference this week. EECA's biogas work programme, focused on mapping feedstock for investment, is progressing into its procurement phase. EECA is preparing to release a Request for Proposals to the market shortly, aiming to engage independent experts to deliver a detailed, region-by-region assessment of organic waste feedstock – starting with three pilot regions before expanding nationally.		On track Released on 22 October					
	Hydrogen Regulations On 23 October, we provided you and the Minister for Workplace Relations and Safety with a briefing on proposed changes to health and safety regulation to support development of the hydrogen sector (BRIEFING-REQ-0021307). Confidential advice to Government		On track Briefing October and Cabinet in November					
Market Impacts and Gas Users Sector, regional impacts and other gas user work	We have now selected a supplier to complete a study into the impact of declining gas supply on the New Zealand economy, with an aim to understand sectoral, regional, and national economic impacts of industrial gas price increases. This will help to inform further policy work on potential options to manage the effects of our declining gas supply and inform decisions on whether or not to invest in an LNG import facility.		On track					

Confidential advice to Government **Gas Networks** On track **Consumer-Focused Regulation Consumer Data** No change: MBIE is progressing with advice on issues raised in submissions **Delayed** Right for on proposals for an electricity sector Consumer Data Right. We have **Electricity** provided you Deliver a CDR for a briefing on the electricity consultation. sector Aiming for policy decisions in Q4 Confidential advice to Government **Energy Efficiency** and Conservation (Energy Flexibility and Regulatory Improvements) **Amendment Bill Enabling EV smart** charging standards Other priorities Confidential advice to Government Confidential advice to Government Confidential advice to Government Confidential advice to Government

Confidential advice to Government **Delayed** We will provide you with a briefing in early November 2025, including the **New Zealand** work completed on the NZEECS to date Confidential advice to Government **Energy Efficiency** Briefing and Conservation week of 3 Strategy November (NZEECS) Develop a refreshed strategy that meets legislative requirements.

Confidential advice to Government

8

Regular reporting

Title Comment Potential commercial On 30 September, the Commerce Commission released its draft determination on the proposed arrangement between the four gentailers to create a Huntly Strategic Energy deals to enhance winter Reserve. The Commission found that the arrangements will likely result in a net public security of supply benefit and provisionally considers it appropriate to authorise the arrangement. Industry actions to improve security of supply The Commission considers it likely that, in the absence of this arrangement, Rankine Unit 2 would retire in early 2026. Therefore, the Commission considers that the arrangement via Huntly contracts will result in the following benefits: Improved security of supply, particularly during dry winters Lower wholesale prices and/or reduced volatility 135 MW of additional unallocated capacity being made available as hedge cover to a wider range of interested parties. The Commission views that any detriments are likely to be minimal – unlikely to facilitate enhanced coordination or increase the ability to exercise market power. This decision by the Commission is a draft determination. Interested parties will have an opportunity to submit their views on the Commission's findings before a final decision is made. The Commission was not explicit on when it will deliver its final decision. Its statutory deadline for a decision is 16 February 2026. However, we understand that a final decision is likely to be made before this (potentially in November). Free and frank opinions Free and frank opinions Gas security of supply Commercial Information report Dominic Kebbell

Electricity security of supply report

Tamara Linnhoff
Privacy of natural persons

ELECTRICITY CAPACITY (for the week of Sunday 19 October)

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The N-1-G margins in the NZGB forecast are healthy through to mid-December 2025:

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ENERGY (HYDRO) STORAGE RELATIVE TO MEAN (for the week to 19 October)

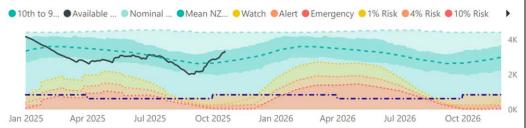
National hydro storage increasing to 121% of the historic mean from 115% the week prior. South Island hydro storage increased from 112% to 118% of historic mean and North Island storage increased from 135% to 143%.

ELECTRICITY ('ENERGY') SUPPLY RISK (at 19 October)

New Zealand controlled energy storage is above average for this time of year. The black curve shows the actual hydro storage and the fields are risk curves:

Dark blue (including dotted blue line) = average for this time of year; Yellow = Watch curve; Orange = alert curve; Dark orange = Emergency curve; Lowest hatched blue line = Available contingent storage.

New Zealand Electricity Risk Status Curves (Available GWh)



Source: System Operator, Market Operations - Weekly Market Movements

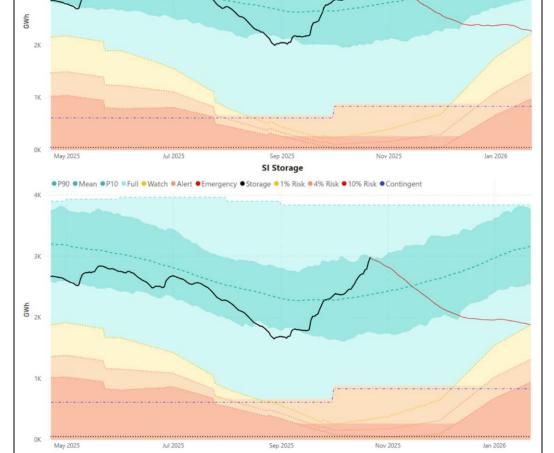
The System Operator last updated the ERCs on **25 September**, commentary on that update is in the Weekly Report of 6 October 2025. The next ERC update is expected soon: late October.

ERCs have lifted for most months in 2026 relative to the August update. This update of the Energy Security Outlook includes the effects of hydro storage at the time, slightly decreased gas production forecasts relative to Transpower's previous outlook, and the announced retirement of a Huntly Rankine unit in January 2026. If the Rankine is not retired, the risk position for 2026 will improve and only four simulated storage trajectories cross Watch.

The Risk Meter is a dynamic reflection of the current Electricity Risk Status. The Risk Meter shows where current total storage is within these status bands and indicates how close the next status is to being triggered.







The ERCs shown were calculated using input data as of **15 September** (though published in the ERCs on **25 September**). The worst-case SST line was calculated using hydro inflow data starting from **29 September**.

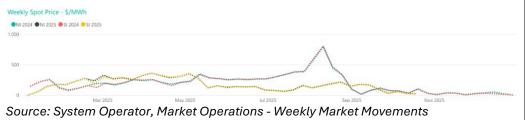
Worst case inflows - Time to cross successive curves

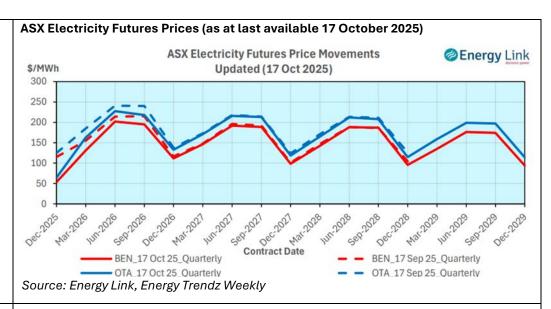
Region	Date Watch	Time to Watch	Date Alert	Time to Alert	Date Emergency	Time to Emergency
NZ	24/01/2026	94	4/03/2026	133	18/04/2026	178
SI	22/01/2026	92	4/03/2026	133	26/04/2026	186

This week the worst-case SST (the **red** line) does not cross the national NZ or South Island Watch curve in 2025, but in late January 2026. The line crosses the Alert curve in March 2026, which would be necessary for generators to be able to access contingent storage.

WHOLESALE ELECTRICITY PRICES

Weekly Spot Price (week ended 19 October 2025)





Transpower's
Connections Queue for
Generation –
improvements to
increase project
throughput

Daniel Brown

Update on queue

- CY2025 run rate to start generation investigations (queue) up by 80% on 2024. 45 investigation projects started, 15 projects moved to delivery in 2025 and 8 grid connections completed.
- Counting both generation and non-generation projects:
- Decrease of 29 projects in queue since January. Maximum wait time for new applications is ~10 months.
- 20 new applications received since January (and one cancelled and one merged).

Improving throughput

Implemented:

- Stage-gating within investigation phase.
- Starting work elements earlier pre-investigation where resources are available (while they wait in queue).
- Published 'Guidelines for new connections' document.
- Connection status information published monthly on webpage. Published short guide to SOSA (for RMA decision-makers) to highlight need to consent and build new renewable generation.
- New CRM system live.
- Guidelines around customer led investigation and delivery substantially completed.
- Concept Solution (preferred connection with acceptance and commercial terms) being used as needed.
- We are continuing to actively manage the queue: 20 projects are currently "on hold" while developers arrange their project financing and consenting; meanwhile we have re-started several projects previously put on hold. This enables us to focus resources on projects that are able to progress.

Work continuing to investigate/implement:

- Right-sizing investigations to meet customer needs and risk appetite.
- Targeted regional plans, identifying project sequencing and interdependencies to improve efficiency.
- Standard equipment lists now including digital substation for standardised designs for greenfield substations.
- Prioritisation options within the queue, based on security of supply (including how soon generation can commence to meet forecast demand) and other measures.

Resourcing improvements:

- Continuing to work with engineering consultants (ECs) on utilisation, EC's growing their resources and different work award mechanisms for larger and bundled projects.
- Considering additional support for resource planning and portfolio optimisation.

Solar numbers update

Stephen Tat Privacy of natural person In the last week's solar numbers update, we noted the drop in solar ICP numbers on Electricity Authority's public Electricity Market Information (EMI) website. We followed up with the Electricity Authority who has explained that it was due to data migration issues in the Electricity Registry (national database of every ICP). This has now been fixed.

The table below provides the updated data. It shows the total number of ICPs and MW capacity in New Zealand of solar systems less than 10kW for the month of September 2025, and the previous month for comparison. The data is drawn from the EMI website.

Category (solar system size: less than and equal to 10 kW)	ICP number	MW capacity	ICP number	MW capacity
	Month end 2025	ing 31 August	Month endin September 2	
Residential solar (all)	68,378	337.249	68,837	340.664
Residential solar (with battery)	11,181	65.425	11,401	67.106
Small, Medium Enterprises solar (all)	2,396	14.233	2,413	14.341
Small, Medium Enterprises solar (with battery)	219	1.455	233	1.549
Commercial solar (all)	1,573	9.374	1,592	9.483
Commercial solar (with battery)	99	0.663	107	0.718
Total (solar all)	72,347	360.856	72,842	364.488
Total (solar with battery)	11,499	67.543	11,741	69.373

Electricity pipeline updates

Daniel Brown

The Electricity Authority will continue to provide you monthly updates.

Critical contingency management regulations

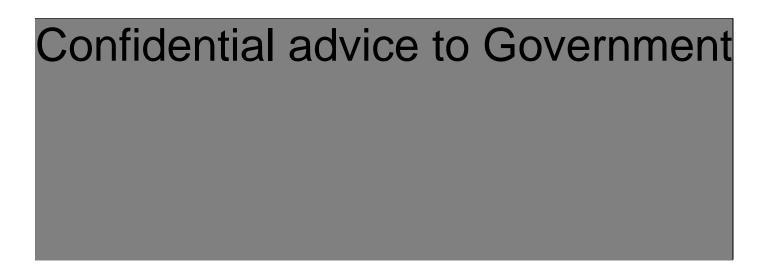
Dominic Kebbell
Privacy of natural persons

In August 2025 you agreed to release an exposure draft of the *Gas Governance (Critical Contingency Management) Amendment Regulations 2025* for targeted consultation with impacted organisations in the gas sector (BRIEFING-REQ-0018542). The exposure draft is nearly ready and we intend to begin consultation the week beginning 27 October 2025. We will provide a copy of the draft regulations and the accompanying consultation document to your office when we release it.

This is a low-risk consultation that seeks feedback on whether the CCM Amendment Regulations are clearly written, can be implemented as intended, are free from drafting errors and effectively implement decisions previously made by the Government. We have sought feedback from GIC on both the draft regulations and the proposed consultation document.

We expect the CCM Amendment Regulations will be ready for you to take to LEG in early 2026.

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Title Comment Commercial Information

Transpower's Security of Supply Outlook

Tamara Linnhoff
Privacy of natural persons

On 23 October Transpower released its Quarterly Security of Supply Outlook, detailing its assessment of security of supply risks and mitigations into 2026.

Key points include:

- After strong spring inflows, hydro storage currently sits above average levels in all major hydro catchments except Hāwea. Compared to the historic mean for this time of year, national storage is currently at 125% and South Island storage at 122%.
- The combined hydro, stored hydro, gas, and coal position this year is approximately 24% greater than the same time last year, which is largely driven by an increased coal stockpile at Huntly.
- The outlook shows that there will be an increased energy risk in 2026 if the announced retirement of a Huntly Rankine unit proceeds.
- However, if all three Rankines (with sufficient fuel to operate them) remain in 2026, then the Energy Risk Curves in 2026 drop significantly. Transpower considers the Commerce Commission's draft determination to authorise the Strategic Energy Reserve Huntly Firming Option as an important step to help maintain security of supply considering the retirement of the Taranaki combined cycle generator at the end of 2025 and the uncertainties in future gas supply.
- In the next six months approximately 335 MW of additional generation capacity is expected to be commissioned, as well as a 100 MW battery. When comparing 2024 and 2025, the outlook shows that delays to some solar generation coming to market have been partially offset by some geothermal generation progressing earlier. Transpower will continue to track how new project commissioning compares against the SOSA pipeline in upcoming outlooks.

Mercury Energy Q1 FY26 update

Tamara Linnhoff
Privacy of natural persons

Mercury Energy

On 17 October 2025 Mercury reported a positive Q1 FY26 update and increased its FY26 EBITDAF by ~+1%. This is due to:

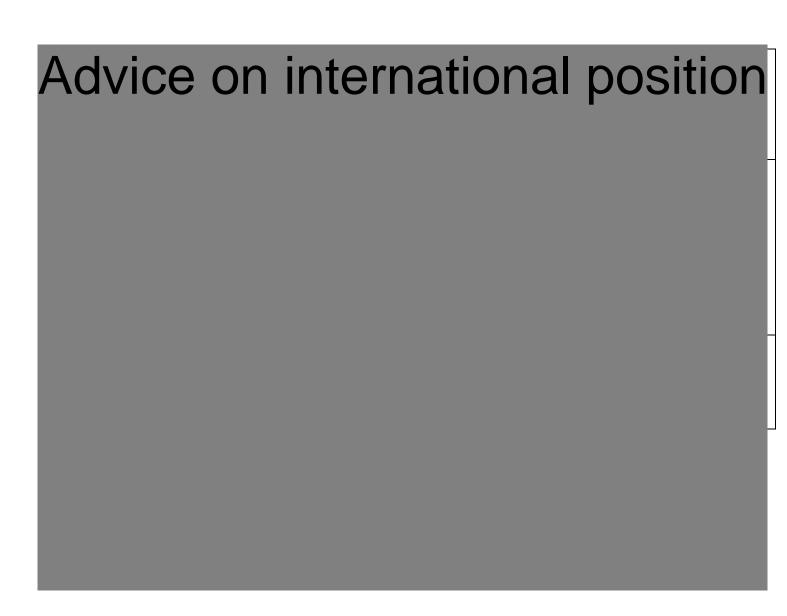
Strong operational performance resulting from hydro generation volumes: Hydro generation volumes were +44% higher than Q1 FY25. The Lake Taupo storage facility is effectively full and storage is ~+150GWh above average for October. While a long generation status coinciding with low wholesale prices does not boost short-term earnings, strong sustained hydro generation levels into Q3 FY26 will likely benefit Mercury, noting an increasing likelihood of a La Niña weather pattern (which traditionally causes low rainfall for South Island hydro storage, where its competitors are based).

Increase in retail gas margin: The retail gas price was increased to cover the costs incurred in Q1 FY25 as a result of a market shortage in 2024.

Upcoming Australia / New Zealand Climate and Finance Ministerial "2+2" meeting

Stephen Tat
Privacy of natural persons

Advice on international position



Current appointments

Upcoming Ministerial Items

1. Upcoming Energy meetings

Meeting date	Meeting	Details	
Wednesday 29 October 2025 3:00 pm – 3:30 pm	Independent Electricity Generators Association (IEGA)	Briefing Due: 22 October 2025 Officials required: Tamara Linnhoff	
Thursday 30 October 2025 11:20 am – 11:50 am	Speak at Electricity Networks Aotearoa (ENA) (by Teams)	Briefing Due: 29 October 2025 Officials required: N/A	

2. Upcoming Briefings, Aides Memoires and Cabinet Papers



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To be publically released shortly

3. Written Parliamentary Questions

Due to Minister	Number	Member	Question	
30 October	50962	Camilla Belich	What board fee increases, if any, did the Minister approve between 27 November 2023 and 31 December 2023, by organisation?	
30 October	50966	Camilla Belich	What board fee increases, if any, did the Minister approve in 2024, by organisation?	
30 October	50970	Camilla Belich	What board fee increases, if any, has the Minister approved in 2025 to date, by organisation?	
31 October	51039	Scott Willis	What companies, if any, have applied for government investment in energy security projects following the Ministers announcement on October 1 2025?	
31 October	51040	Scott Willis	How many applications for government investment in energy security projects, if any, has the Minister received?	
31 October	51042	Scott Willis	What decisions, if any, has the Minister made regarding the procurement of LNG from small scale facilities?	
31 October	51041	Scott Willis	What written advice, if any, has the Minister received regarding the costs of importing LNG?	
31 October	51043	Scott Willis	What decisions, if any, has the Minister made regarding the procurement of LNG from large scale facilities?	

4. Ministerial Correspondence received

Due date	Tracking number	Correspondent	Summary of Correspondence
4 November 2025	SW25-308	Privacy of natural persons	Electricity charges
4 November 2025	SW25-309	Privacy of natural persons	Power prices
4 November 2025	SW25-310	Privacy of natural persons	Government assistance move off gas to electricity
4 November 2025	SW25-312	Privacy of natu	Electricity reforms
5 November 2025	SW25-320	Privacy of natural persons	Whakatāne Mill Limited
11 November 2025	SW25-311	Privacy of natural persons	Renewable energy
11 November 2025	SW25-313	Privacy of natural pers	Solar in schools

11 November 2025	SW25-314	Privacy of natural persons	Nuclear power
11 November 2025	SW25-315	Privacy of natural persons	LNG
11 November 2025	SW25-316	Privacy of natural persons	Solar carports and solar panels
11 November 2025	SW25-317	Privacy of natural persons	Battery storage
11 November 2025	SW25-318	Privacy of natural persons	Entrust dividend

5. Overview of Energy Package Programme