

5 May 2023

Justine Cannon
Energy Markets Policy
Ministry of Business, Innovation and Employment
PO Box 1473
WELLINGTON

By email: HazardsFromTrees@mbie.govt.nz

Dear Justine

Strengthening the 'Tree Regulations' to improve resilience of electricity

1. This is a submission from the Major Electricity Users' Group (MEUG) on the Ministry of Business, Innovation and Employment's (MBIE) discussion document "*Review of the Electricity (Hazards from Trees) Regulations 2003*"¹ published for consultation in March 2023.
2. MEUG members have been consulted in the preparation of this submission. This submission is not confidential. Members may lodge separate submissions.

Importance of a safe, secure, and resilient electricity supply

3. We support this review of the *Electricity (Hazards from Trees) Regulations 2003* to improve the resilience of New Zealand's electricity network and to address the views of both works owners and vegetation owners.
4. As the country addresses climate change, it will be increasingly more important that we have a safe, secure, and resilient electricity supply to support the move towards greater electrification. MBIE considers this in its discussion document, through its "Evidence of current problem" section where it looks at the expenditure spent on vegetation management and the impact on quality measures for both Transpower and electricity distributors. We believe these are useful measures but do not fully capture the true scale of disruption and impact that electricity supply interruptions caused by vegetation can create for businesses and householders – particularly in acute weather events such as Cyclone Gabrielle.
5. We encourage MBIE not to understate the value of a secure and resilient electricity network when undertaking its comparison to the value of vegetation (or productive land for vegetation). We consider the value of the electricity system and how its supports New Zealand's action to address climate change outweighs the economic costs faced by

¹ <https://www.mbie.govt.nz/have-your-say/tree-regulations/>

works owners.

6. If you have any questions regarding our submission, please contact MEUG on 027 472 7798 or via email at karen@meug.co.nz.

Yours sincerely



Karen Boyes
Major Electricity Users' Group