



20 February 2026

Ben Woodham
Electricity Distribution Manager
Commerce Commission
44 The Terrace
WELLINGTON

Dear Ben

Submission - DPP4 Quality Incentive Adjustment Correction

1. INTRODUCTION

1. Orion welcomes this opportunity to provide feedback on the Commerce Commission's (Commission) draft decision, *'Amendment to DPP4 default price-quality path – Quality incentive adjustment correction'*.
2. No part of this submission is confidential.
3. Orion owns and operates the electricity distribution infrastructure in Central Canterbury, including Ōtautahi Christchurch city and Selwyn district. Our network is both rural and urban and extends over 8,000 square kilometres from the Waimakariri River in the north, to the Rakaia River in the south; from the Canterbury coast to Arthur's Pass. We deliver electricity to more than 230,000 homes and businesses and are New Zealand's third largest Electricity Distribution Business (EDB).

2. SUPPORT FOR CORRECTION

4. Orion considers that timely and effective correction of errors, when detected, is critical to the integrity of regulatory frameworks.
5. Orion supports the Commission's proposed correction of the quality incentive adjustment. We consider that the proposed correction appropriately restores the time-value-of-money adjustment that was featured, and consulted on, in the DPP4 draft determination.¹

3. CLOSING

6. We thank the Commission for the opportunity to provide our views on the proposed correction. If you have any questions about this submission, please contact the undersigned.

¹ Commerce Commission. (2024). [\[Draft\] Electricity Distribution Services Default Price-Quality Path Determination 2025](#). 24 May 2024.

Yours sincerely

A handwritten signature in blue ink, consisting of a series of loops and a long horizontal stroke extending to the left.

Alec Findlater
Regulatory Lead – Commerce Commission