



4 September 2024

Committee Secretariat

Education and Workforce Committee

Parliament Buildings

Wellington

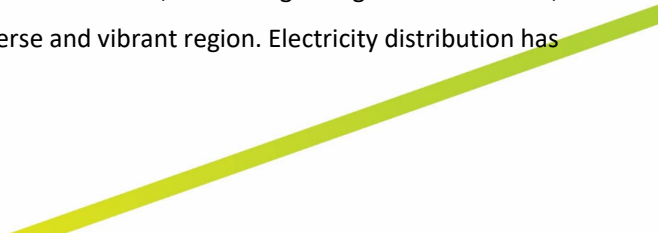
Dear Committee members

Regulatory Systems (Immigration and Workforce) Amendment Bill

1. Orion New Zealand Limited (Orion) welcomes the opportunity to make a submission on the Regulatory Systems (Immigration and Workforce) Amendment Bill.

About Orion

2. Orion owns and operates the electricity distribution infrastructure in Central Canterbury, including Ōtautahi Christchurch. 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 224,000 homes and businesses and are New Zealand's third largest Electricity Distribution Business (EDB). Orion and its various predecessors have been providing this essential service to the region for close to 120 years.
3. Orion is a Lifeline Utility for the purposes of the Civil Defence Emergency Management Act 2002. Orion has a statutory duty under this legislation to ensure it is able to function to the fullest possible extent, even though this may be at a reduced level, during and after an emergency.
4. Orion has a fully owned subsidiary, industry service provider Connetics, and together with Orion the two organisations make up the Orion Group.
5. Central Canterbury is a place of rapid growth and transformation, embracing change and innovation, with Ōtautahi Christchurch at the heart of this diverse and vibrant region. Electricity distribution has



always been an essential service that underpins regional, community and economic wellbeing. Our service is vital to the wellbeing and livelihood of the people and businesses who live and operate here. Now, it also has a critical part to play in New Zealand's transition to a low carbon economy.

6. We support the submission of Electricity Networks Aotearoa (ENA) on this Bill.

Submission on the Bill

7. Orion supports the replacement of section 169C of the Electricity Act 1992 with the three new provisions – clauses 169C, 169D, and 169E.
8. Providing for a system where the Minister is able to approve electricity safety instruments and amendments to those instruments, as well as enabling a delegation process to Worksafe should provide for a quicker approval process. Subsequently, we are hopeful regulations referring to these instruments can also be made in a faster timeframe. (We acknowledge that an electricity safety instrument only has legal effect only to the extent that any regulations made under the Electricity Act 1992 refer to it.)
9. As the ENA have noted, *“In the fast-moving world of power system technological development, it is important that the New Zealand distribution sector is able to rely upon modern standards referenced in relevant regulations and codes in a timely manner.”*

Conclusion

10. Thank you for the opportunity to provide this submission. We do not wish to be heard in support of this submission.
11. We do not consider that any part of this submission is confidential. If you have any questions about this submission please contact Vivienne Wilson, Policy Lead, Orion New Zealand Ltd at vivienne.wilson@oriongroup.co.nz

Yours sincerely

Vivienne Wilson
Policy Lead