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Infrastructure Commission

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Tēnā koutou

FEEDBACK ON DRAFT NATIONAL INFRASTRUCTURE PLAN

Unison Networks Limited (Unison) is an electricity distribution company serving Hawke's Bay, Taupō, and Rotorua. Centralines Limited (Centralines) operates as a distributor in Central Hawke's Bay. We welcome the opportunity to provide feedback on the Draft National Infrastructure Plan. This submission outlines our key areas of support, identifies opportunities for improvement, and offers targeted recommendations to strengthen the final strategy.

We strongly support the Plan's aim to take a non-partisan, long-term approach to infrastructure planning. Ensuring stability and continuity across political cycles is essential to maintain confidence among investors, communities, and delivery partners. Embedding these principles will enable the Plan to deliver on its ambition of long-term economic and social value.

1. Key Areas of Support

- We endorse the Plan's overall direction and support the following aspects:
 - Coherent long-term vision: The 30-year horizon provides much-needed clarity to guide sustainable, efficient infrastructure development.
 - Focus on productivity, resilience, and wellbeing: These priorities help shift the conversation beyond short-term political imperatives to outcomes that matter for all New Zealanders.
 - Pipeline of projects: A proposed pipeline of nationally significant infrastructure projects combined with improved procurement and funding mechanisms aligns with the goal of maximising economic value.
 - Non-partisan foundation: Cross-party consensus and continuity are critical to infrastructure success and should remain a central principle of the Plan.

2. Areas for Improvement and Recommendations

A. Develop a National Energy Strategy

- While the draft references energy infrastructure, it lacks an integrated and coordinated National Energy Strategy. This represents a critical gap, given energy's foundational role across all sectors of infrastructure.
- Why this matters:
 - Enables decarbonisation and supports emissions targets
 - Provides investment certainty and regulatory stability
 - Strengthens energy resilience in the face of climate and supply shocks
- **Recommendation:**
Embed a National Energy Strategy within the Plan that includes:
 - Long-term forecasts for electricity generation and demand

- Strategic upgrades to transmission and distribution networks
- Clear planning for storage, backup generation, and system flexibility
- Transparent and stable regulatory settings to attract private investment

B. Publish and Maintain a National Pipeline of Projects

- We strongly support the publication of a transparent, prioritised pipeline of infrastructure projects grounded in economic value.
- Why this is essential:
 - Builds public trust and policy credibility through visible trade-offs
 - Supports cross-sector alignment and capability planning
 - Encourages depoliticised, evidence-based decision-making
 - Enables inclusive and ongoing engagement with iwi, communities, and industry

Publishing and maintaining this pipeline will foster greater consensus by clarifying long-term benefits, risks, and national priorities.

3. Additional Comments

- To ensure lasting impact, we recommend the final Plan:
 - Commits to publishing a project pipeline with quantified economic and social benefits
 - Integrates a robust National Energy Strategy
 - Supports adaptive, foresight-based governance to manage changing technologies, climate risks, and global pressures

4. Conclusion

The Draft National Infrastructure Plan represents a strong foundation for building a more resilient, productive, and inclusive Aotearoa.

- To maximise its long-term value, we recommend:
 - Embedding a clear and coordinated National Energy Strategy
 - Reinforcing a non-partisan approach to infrastructure policy and decision-making
 - Publishing and maintaining a transparent pipeline of nationally significant projects

These steps will help secure enduring consensus, attract sustained investment, and ensure infrastructure decisions are guided by strategic foresight and national wellbeing.

Thank you for the opportunity to provide feedback. We support the continued refinement of this strategy and its role in shaping New Zealand's infrastructure future.

Nā māua noa, nā

SM COMMERCIAL AND REGULATORY / REGULATORY MANAGER