

12 May 2026

Stephen Jones
Grid Investment Group Manager
Transpower
Wellington

Email: grid.investments@transpower.co.nz

RE: HVDC Cable Decommissioning Consultation

Thank you for the opportunity to submit as part of this consultation process. Given the decommissioning cost would be a major project in its own right, and is budgeted to be circa 10% of the \$1.2b cost of the replacement cables, it is appropriate that Transpower consult on the decommissioning separately.

The report identifies removal of the old cables as non-essential to installation and functioning of the new cables and equipment. It also seems that not all the cable can be removed and we question whether parts of severed cable remaining on the sea floor may have more adverse effects than the cables remaining intact.

The suggestion leaving the old cables MAY have some impact on future works would seem to be a nice to have rather than a need to have. Such discretionary spend is something many businesses operating in the competitive world cannot entertain in the current economic environment.

The decision to leave in situ or to remove is one for Transpower. Whatever the decision, **the cost should lay with Transpower**. The HVDC asset was largely in place when Transpower 'inherited' it on formation as an SOE in 1994. A return has been earned and dividends paid over the 30+ years. The cost of removal lays with the owner of that asset.

To place the costs of removal largely on the consumers of the day is neither just nor appropriate.

NZ Steel will be pleased of an opportunity to discuss our submission.

Regards



Alan Eyes | Energy Manager – Policy & Industry
New Zealand Steel

T [REDACTED]
E [REDACTED] www.nzsteel.co.nz
A 131 Mission Bush Road, Glenbrook, Private Bag 92121, Auckland 1142