

Monday 18/05/2026

To: Transpower New Zealand

Re: Tararua Enabling Renewables – Major Capex Proposal Long List Consultation

Dear Sir/Madam,

On behalf of the Manawatū-Whanganui Lifelines Advisory Group, I write in support of the Tararua Enabling Renewables Major Capex Proposal consultation process and the investigation into strategic transmission investment across the Tararua and Wairarapa regions.

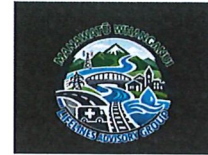
The Manawatū-Whanganui Lifelines Advisory Group recognises the importance of resilient, coordinated, and future-focused infrastructure investment to support regional and national energy security. The proposal identifies a significant opportunity to unlock renewable generation potential while addressing emerging transmission constraints on the regional 110 kV network. We acknowledge the strategic importance of the Tararua and Wairarapa regions as nationally significant renewable energy corridors, particularly for wind and solar generation development.

We support Transpower's proactive and coordinated regional planning approach, including consideration of both staged 110 kV upgrades and longer-term 220 kV development pathways. The consultation documents demonstrate that existing network constraints may increasingly limit the connection and dispatch of renewable generation if investment does not occur in a timely and integrated manner. The current reliance on special protection schemes and operational constraints also highlights the need for enduring network resilience solutions.

We also recognise the strategic importance of improving transmission capability between Woodville and Bunnythorpe, given the identified constraints on the existing corridor and its importance for enabling renewable generation dispatch, maintaining operational flexibility, and strengthening resilience across the lower North Island transmission network. From a lifelines perspective, improving this connection would assist in reducing network congestion risks, improving redundancy, and supporting continuity of electricity supply during contingency events.

From a lifelines and resilience perspective, the proposal presents several important benefits:

- strengthening regional electricity security and transmission resilience;
- enabling diversification of renewable generation sources;
- supporting electrification and regional economic development;
- reducing the risk of future supply constraints and congestion;



- improving the long-term adaptability of the network to changing demand and generation patterns; and
- supporting national decarbonisation objectives and energy transition pathways.

We also support the inclusion of non-transmission solutions and staged investment options within the assessment framework, recognising the value of maintaining flexibility while ensuring infrastructure decisions remain robust under a range of future demand and generation scenarios.

The Manawatū-Whanganui Lifelines Advisory Group encourages continued engagement with local authorities, infrastructure providers, mana whenua, emergency management agencies, and regional stakeholders as the investigation progresses. In particular, consideration should continue to be given to:

- interdependencies between electricity, transport, telecommunications, water, and fuel infrastructure;
- climate resilience and natural hazard exposure;
- asset vulnerability and recovery capability during major disruptive events;
- construction sequencing and operational continuity risks; and
- opportunities for coordinated regional resilience outcomes.

We appreciate the opportunity to provide feedback at this early stage of the consultation and look forward to ongoing engagement as the project develops toward a shortlist of preferred investment pathways.

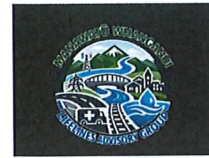
Yours sincerely,

A handwritten signature in black ink, appearing to be "VW", written over a light blue horizontal line.

Vicki Wills

Chair

Manawatū-Whanganui Lifelines Advisory Group



Attachment A

Risks, Opportunities & Asset Vulnerability Assessment

Tararua Enabling Renewables – Major Capex Proposal Consultation

Prepared by: Vicki Wills

Chair

Manawatū-Whanganui Lifelines Advisory Group

Date: Monday 18 May 2026

1. Purpose

This paper outlines key risks, opportunities, resilience considerations, and asset vulnerability issues associated with the Tararua Enabling Renewables Major Capex Proposal currently under consultation by Transpower.

The paper is intended to support a lifelines and infrastructure resilience perspective as part of the consultation process.

2. Context

The Tararua and Wairarapa regions are strategically significant to New Zealand's future renewable electricity generation capacity, particularly for wind and solar development.

The consultation documents identify:

- significant renewable generation potential within the region;
- increasing transmission constraints on the existing 110 kV network;
- growing generation connection demand;
- increasing electrification and future load growth; and
- the potential need for coordinated regional transmission investment including both 110 kV and possible 220 kV infrastructure solutions.

The proposal represents both a major infrastructure opportunity and a significant resilience consideration for the wider lower North Island electricity system.

3. Strategic Opportunities

3.1 Increased Renewable Generation Capacity

The proposal provides an opportunity to:

- unlock significant wind and solar generation potential;
- support national decarbonisation objectives;
- reduce long-term reliance on fossil-fuel generation;
- improve renewable generation diversity across the national grid; and
- support energy affordability through increased generation supply.



The Tararua and Wairarapa regions are nationally important renewable energy corridors with high wind resource quality and growing solar development interest.

3.2 Improved Electricity Resilience

Coordinated transmission investment has the potential to:

- strengthen regional electricity security;
- improve network redundancy;
- reduce congestion risks;
- improve resilience and transfer capability along the Bunnythorpe–Woodville corridor, which is identified as a key constraint area for future renewable generation integration
- reduce reliance on operational special protection schemes;
- improve operational flexibility during contingencies; and
- support faster recovery following disruptive events.

This is particularly important given the increasing dependence of communities, industry, and critical services on reliable electricity supply.

3.3 Support for Electrification and Regional Growth

Improved transmission capability may:

- support industrial electrification;
- enable regional economic development;
- support transport electrification;
- improve investment confidence; and
- facilitate future growth in both demand and distributed generation.

The proposal aligns with broader national electrification and resilience objectives.

3.4 Coordinated Infrastructure Planning

A coordinated regional approach creates opportunities for:

- integrated corridor planning;
- reduced duplication of infrastructure investment;
- improved resilience outcomes;
- more efficient long-term network development; and
- improved coordination between infrastructure providers and regional stakeholders.

4. Key Risks

4.1 Natural Hazard Exposure

The Tararua and Wairarapa regions are exposed to a range of natural hazards including:

- earthquakes;
- landslides;
- severe weather events;
- flooding;
- erosion;



- wildfire risk; and
- climate-related hazards.

Transmission assets located across remote and elevated terrain may be vulnerable to:

- structural damage;
- access limitations;
- prolonged outage durations;
- erosion and slope instability; and
- constrained emergency restoration capability.

Consideration should be given to both current and future climate hazard exposure over the operational life of the assets.

4.2 Asset Concentration and Network Dependency

The proposal identifies several transmission corridors already approaching operational limitations under certain conditions.

Risks associated with constrained or concentrated transmission corridors include:

- cascading outages;
- generation curtailment;
- reduced system flexibility;
- increased operational complexity;
- reliance on special protection schemes; and
- reduced resilience during major contingency events.

As renewable generation capacity increases, transmission dependency across key corridors will also increase.

4.3 Infrastructure Delivery Risks

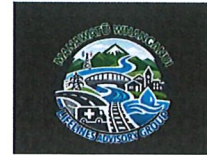
Major infrastructure projects of this scale face risks associated with:

- consenting and regulatory approvals;
- supply chain limitations;
- construction cost escalation;
- contractor availability;
- land access negotiations;
- environmental constraints; and
- project sequencing uncertainty.

There is also risk associated with timing mismatches between transmission investment and actual renewable generation commitments.

4.4 Future Generation Uncertainty

While renewable generation interest is substantial, many projects remain uncommitted or subject to changing market conditions.



Risks include:

- underutilised infrastructure investment;
- stranded assets;
- changing technology pathways;
- uncertain generation timing; and
- future shifts in electricity market conditions.

Adaptive and staged investment pathways may assist in managing these uncertainties.

4.5 Community and Environmental Impacts

Potential impacts requiring careful management include:

- landscape and visual impacts;
- ecological and biodiversity effects;
- cultural and iwi considerations;
- construction disruption;
- land use impacts; and
- community acceptance of new transmission infrastructure.

Continued engagement with mana whenua, local authorities, landowners, and communities will be important throughout future project stages.

5. Asset Vulnerability Considerations

5.1 Critical Infrastructure Resilience

Electricity infrastructure is a critical dependency for:

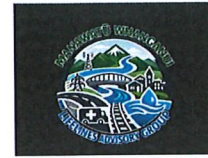
- telecommunications;
- water supply and wastewater systems;
- transportation;
- fuel distribution;
- emergency management systems;
- health services; and
- regional economic activity.

Extended electricity outages can therefore create cascading impacts across multiple lifeline sectors.

5.2 Recovery and Restoration Challenges

Remote transmission infrastructure may present challenges relating to:

- physical access during emergencies;
- restoration timeframes;
- availability of specialist equipment;
- workforce deployment; and
- weather-related operational constraints.



Consideration should be given to emergency response coordination and restoration prioritisation.

5.3 Climate Adaptation

Long-term infrastructure planning should incorporate:

- future climate projections;
- changing storm intensity patterns;
- increasing temperature impacts on asset ratings;
- flood and erosion exposure;
- wildfire resilience; and
- long-term adaptive design standards.

6. Recommended Considerations for Future Project Stages

The Manawātū-Whanganui Lifelines Advisory Group encourages continued consideration of:

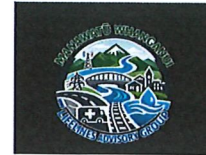
- resilience-by-design principles;
- infrastructure redundancy and diversity;
- staged and adaptive investment approaches;
- interdependency analysis across lifeline sectors;
- climate adaptation and hazard resilience;
- emergency restoration capability;
- coordinated regional infrastructure planning; and
- ongoing stakeholder and community engagement.

7. Conclusion

The Tararua Enabling Renewables proposal presents a significant opportunity to strengthen New Zealand's electricity system resilience while enabling major renewable generation development and supporting long-term electrification objectives.

The proposal also involves important considerations relating to infrastructure resilience, natural hazard exposure, asset vulnerability, operational dependency, and long-term uncertainty.

A coordinated, resilience-focused approach to planning and investment will help ensure the resulting infrastructure remains robust, adaptable, and capable of supporting both regional and national energy security objectives over the long term.



Appendix B – Responses to Selected Consultation Questions

Response to Q1 – Do you agree with the assessment of the investment need?

Yes.

The Manawatū-Whanganui Lifelines Advisory Group agrees that there is a clear and growing need for strategic transmission investment within the Tararua and Wairarapa regions to:

- address emerging transmission constraints;
- support increasing renewable generation capacity;
- improve long-term electricity resilience and security of supply; and
- accommodate future electrification and regional growth.

We support a coordinated regional planning approach rather than incremental or piecemeal upgrades.

Response to Q2 – Are there any other issues or considerations relating to the investment need that should be incorporated into the investigation?

The following matters should continue to be incorporated into the investigation and assessment framework:

- resilience of critical electricity infrastructure during major natural hazard events;
- interdependencies with other lifeline utilities including telecommunications, transport, water, and fuel supply;
- climate change impacts and long-term adaptation requirements;
- asset vulnerability associated with remote and exposed transmission corridors;
- the strategic importance of strengthening the Bunnythorpe–Woodville transmission connection as a critical resilience and renewable energy corridor;
- emergency response, restoration capability, and access constraints during outages;
- cumulative regional resilience benefits associated with network redundancy and diversification;
- impacts of prolonged transmission outages on communities, emergency management, and economic continuity; and
- opportunities for coordinated infrastructure corridor planning and shared resilience outcomes.

Response to Q14 – Calculation period

The proposed calculation period to 2055 appears reasonable given:

- the long operational life of transmission infrastructure assets;
- the staged nature of renewable generation development;
- the long-term strategic importance of electrification and decarbonisation; and
- the need to appropriately capture intergenerational infrastructure benefits.



Consideration could also be given to longer-term sensitivity testing for major coordinated 220 kV development pathways.

Response to Q15 – Discount rate

The proposed 3% discount rate is supported as an appropriate mechanism to better recognise:

- long-term resilience and decarbonisation benefits;
- strategic national infrastructure outcomes;
- future avoided costs associated with constrained electricity supply; and
- broader economic and societal benefits associated with renewable energy enablement.

Testing sensitivities at alternative discount rates is also supported.

Response to Q16 – Additional unquantified benefits

Additional benefits that may warrant consideration include:

- enhanced regional resilience and recovery capability;
- reduced vulnerability to future supply disruptions;
- increased infrastructure redundancy and operational flexibility;
- improved investor confidence for regional development;
- long-term support for regional economic growth and electrification;
- resilience benefits associated with distributed renewable generation;
- reduced reliance on emergency operational interventions and generation curtailment; and
- improved ability to maintain critical services during major disruptive events.

