

12 September 2025

Expert Panel

Environmental Protection Authority

By email: substantive@fasttrack.govt.nz

Copy: bruce@cartergroup.co.nz

Fast-track Approvals Ryans Road Industrial Area (FTA331)

Dear Expert Panel members,

Thank you for providing us with the opportunity to comment on the fast-track application for the above development.

Capacity Requirements

We confirm that, at this stage, we have the capacity in our network to accommodate the initial requirement of 2MW to meet the needs of Stage 1 of the proposed development.

In parallel, we are currently undertaking planned network reinforcement works that will enable us to support the remaining anticipated load uptake of the development.

We would, however, comment that, until connection applications are received and processed, the above cannot be guaranteed and is not able to be reserved.

Connection Considerations

At this stage, a connection roadmap has not yet been developed. We will work with Carter Group Limited to establish what this will look like, and as part of this process we will need to understand:

- The total number of connections required;
- The size of these connections;
- The rollout programme, including key dates.

Once this information is available, we will be able to provide an estimate of the projected total cost and the proposed allocation methodology.

Impact on Orion's network

We note the proposal to create a pedestrian walkway and to naturalise the existing water race, which may require relocation or undergrounding of our existing network poles. We also note that several other utilities are proposed as part of the development. We are aware of these requirements and anticipate being able to accommodate them through collaborative design, thereby minimising any impact on construction staging.

Summary

We welcome the opportunity for continued engagement to ensure our plans remain aligned with the needs of the development. We are also open to engaging with other interested parties to support a cohesive and coordinated approach. Following this, we will be pleased to receive connection application(s).

Please do not hesitate to contact me if you have any further questions.

Regards

Dougie MacDonald

Energy Solutions Lead

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Orion New Zealand Limited