



14 January 2026

National Green Steel  
32 Omaha Road  
Remuera  
Auckland 1050

Dear Vipan,

**Hampton Downs 56MW Supply to National Green Steel**

Counties Energy provides the following technical advice regarding the proposed electrical supply arrangement for the National Green Steel (NGS) development for consideration by the Expert Panel.

Counties Energy confirms that it has the network capability and engineering pathway to provide 56 MW of firm capacity to the NGS site. [REDACTED]

[REDACTED]

Counties Energy also supplies the adjacent Enviro NZ facility. This is because there are no regulated Electricity Distribution Business (EDB) territorial boundaries. Therefore, Counties Energy can supply National Green Steel even though there is another EDB in the same location.

From a consenting and route-designation perspective, 110 kV assets are a permitted activity within the road corridor, enabling construction on either overhead pole structures or underground cabling without the need for resource consent. This materially reduces consenting uncertainty and allows for a more certain delivery timeframe.

Counties Energy has completed preliminary route assessments and has identified an alternative alignment that avoids the Saxton property entirely. [REDACTED]

[REDACTED]

[REDACTED] Other viable route options also exist; the alignment described above is presented as an example of an implementable, effects-minimising solution.

Counties Energy is an local authority under the Public Works Act, which provides the statutory mechanisms required to secure access where necessary for nationally significant infrastructure.



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With respect to site infrastructure, no substation is required because NGS will take supply directly at 110 kV. Instead, a 110 kV switching and metering yard would be constructed to house protection circuit breakers, isolation and switching assets, and the required 110 kV metering unit. Counties Energy recently completed detailed design for a comparable 110 kV connection in south Papakura, and the engineering methodology, equipment specifications, and grid-integration processes from that project can be directly applied to the NGS connection.

Should the Expert Panel require a formal technical statement, diagrammatic route descriptions, or engineering justification reports, Counties Energy will prepare these accordingly.

Yours sincerely,



**Counties Energy Limited**

Andrew Toop

GM Commercial and Business Development