

Rhianne Ogilvie
Commerce Commission,
PO Box 2351,
Wellington 6140.

FINAL

By email to regulation.branch@comcom.govt.nz

Re: Submission on proposed changes to ID determinations - 28 July 2017.

Dear Rhianne

Thank you for the opportunity to provide feedback on the Commission's proposal to make amendments to the Information Disclosure (ID) determinations. ENA members understand that the proposed changes include:

1. Issues from the 2016 review of the IM's that require consequential amendments to the ID determinations for consistency reasons;
2. Specific changes to the EDB asset health disclosure requirements;
3. Issues that have arisen through the Commission ID compliance testing processes.

We note that these changes, and changes to the transition arrangements for implementation of the new determinations, are provided as mark-ups to the Electricity Distribution Information Disclosure Amendments Determination 2017. As you know, the ENA works with Price Waterhouse Coopers (PwC) on detailed technical matters with IM and ID determinations, such as those listed above, and we have joined forces with them again in regards this consultation. Accordingly, PwC will provide you with our combined views on the mark ups of the technical changes.

That said, the ENA does wish to make submissions on one aspect of the proposed changes. Attachment A of the Companion paper includes a list of ID matters that the Commission has decided to defer from consideration during this round of amendments. We understand and accept that at any particular time there could be a material number of candidates for changes to the ID requirements, and that some sort of prioritisation is required.

It seems to us that the Commission has taken something of a 'lightly over the top' approach to the proposed changes – mapping the IM changes into ID, tidying up simple administrative issues and attending to some 'low effort' EDB asset health matters. Noting that some substantial ID matters

deferred from 2015 were also dealt with as part of the 2016 IM review, at this point in time we have concerns that the deferred items remain as a substantial list. The ENA considers that they should be dealt with as a matter of priority.

The deferred disclosure matters in Table A1 in Attachment A are important to ENA members. Members spend a lot of time and effort to understand, interpret and comply with the ID requirements and consider that the Commission should give priority to many of these items to improve the 'fitness for purpose' of the ID requirements.

Again, thank you for the opportunity to provide feedback.

Yours sincerely

A handwritten signature in black ink, appearing to be 'D. de Boer', written in a cursive style.

David de Boer

Principal advisor, regulation and pricing