

5 October 2023

To the Commerce Commission infrastructure regulation team,  
infrastructure.regulation@comcom.govt.nz

## Introduction

1. Thank-you for the opportunity to make this cross-submission. We welcome the opportunity to cross-submit on the *Targeted Information Disclosure Review (2024) – Electricity Distribution Businesses, Draft decision review*.
2. Northpower is supportive of many of the submissions where common themes were pointed out that:
  - a. Greater clarity is needed in the definition of the requirements, to ensure consistency of approach across EDBs.
  - b. The timing and cost of introducing some of these new systems and processes is likely to cause material issues with data recording and collation and it is important that EDBs have time to prepare their systems and processes.

## Amendment AM6 Schedule 9c – Vegetation management reporting

3. Whilst we appreciate the intent of Wellington Electricity's submission on Schedule 9c in relation to proposing further information on top of 'overhead circuits sites at high risk of vegetation damage' proposed in the draft decision, we are concerned that, without a clear definition of "overhead circuit sites" as mentioned in our earlier submission, any further development on this can cause further confusion and provide little consistency between EDBs. In addition, we agree that additional level of disaggregation of vegetation management costs, separating the cost of repeated hazard tree and cut and trim notice visits, could be useful, however, this information could be costly to collect where the costs can outweigh the benefits.
4. We agree with Aurora's submission on Schedule 9c that the metric of 'overhead circuits sites at high risk of vegetation damage' is vague and, therefore, unlikely to result in consistent or useful reporting. In particular, 'high risk' is not clearly defined and therefore can be subjectively interpreted by different EDBs resulting in little consistency and comparability among EDBs. We would suggest using a term such as "exposed to risk of" rather than "high risk".

## Amendment AM6 Schedule 10 – Vegetation management reporting

5. We appreciated Network Waitaki's submission on Schedule 10 to limit the disaggregated causes to "in-zone" and "out-of-zone". However, as per our earlier submission, to really understand the driver of vegetation faults and avoid confusion and overlaps, a more appropriate approach could be to classify all vegetation faults into inclement weather related (including wind-borne debris) or non-weather related, then this could be further broken down into sub-categories of in-zone or out-of-zone.

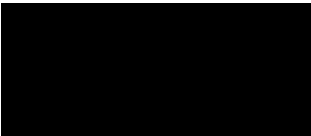


### Amendment D5 definition of non-traditional solutions

6. We support the intent of Vector's and Wellington Electricity's submissions on the definition of 'non-traditional solutions' to provide better clarity and reduce ambiguity, however, we question whether by using the term of 'non-wired' would achieve this outcome, because, as per the proposed definition in the draft decision, the solutions are all wired into the network. And for example, hot water load control has been a traditional solution for many years, and it is wired into the network, is this included?

### Conclusion

7. Thank you for the opportunity to make a cross-submission on the draft decision Targeted Information Disclosure Review (2024) – Electricity Distribution Businesses.
8. If you have further queries regarding this submission do not hesitate to contact me on either [REDACTED] or phone [REDACTED]



**Simon SHEN**

Head of Commercial and Regulatory

**Northpower**

be mindful be present be safe