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**From:** Niamh Shaw (Neeve) [Niamh.Shaw@qldc.govt.nz]  
**Sent:** 27/08/2020 9:46:15 p.m.  
**To:** Feedback Aurora Plan [feedbackauroraplan@comcom.govt.nz]  
**Subject:** Submission on Aurora's CPP application 2020

Dear Commerce Commission

Many thanks for the opportunity to provide feedback on Aurora's CPP.

It should go without saying that the exorbitant line charge increases proposed by Aurora are unacceptable from a consumer perspective.

I object to Aurora's application, for the following reasons:-

1. Aurora's proposed charge increases are unaffordable for at least 10% of its customers in the Queenstown-Lakes district (QLDC's Quality of Life Report 2019 reflected that 15% of our community are unable to adequately heat their homes, if at all; with 70% citing affordability of heating as the reason. With a global pandemic, the current figure is likely much higher)
2. There is little transparency, visibility, timeframe or any degree of surety around the proposed price increases
3. The Commerce Commission clearly states on its website that it can't "control what distribution businesses or Transpower charge individual customers or groups of customers". There is therefore no authority effectively protecting the consumer's interests in terms of unacceptable price increases
4. Over the last ten years, Aurora has demonstrated irresponsible fiscal management, an egregious failure of governance, and under-investment in its network. Such past performance raises serious doubts as to whether Aurora is capable of upgrading its network to provide acceptable standards of service, even with the requested consumer investment

Therefore, I would recommend:-

1. In the long-term, that Aurora be encouraged to divest itself of its Central Otago network, and it be set up as a consumer public trust.  
In the meantime;
2. That Aurora be directed to resubmit its application with reasonable line charge increases, spread over a defined long term period, after it has 'better data and evidence'
3. That Aurora's request to reduce minimum standards for planned or unplanned outages be rejected
4. That a Consumer Charter be established that regulates consumer pricing
5. That Aurora's CPP application be considered in the full context of the company's asset mismanagement and failure(s) of governance

Thank you for your consideration. Please note this is a personal submission, and should be held in confidence.  
Many kind regards

Niamh Shaw

[Redacted] | Councillor | Wanaka Ward

Queenstown Lakes District Council

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