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Commerce Commission
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SUBMISSION: DRAFT DETERMINATIONS AURORA ENERGY CPP & DPP VARIATION

Central to Aurora's CPP and DPP3 variation applications are the unplanned SAIDI and SAIFI reliability indicators. These numbers drive the core narrative of declining reliability due to asset deterioration and an "urgent investment" imperative. It is evident that these figures prepared and disclosed by Aurora are both inconsistent and highly misleading. One only has to look a little closer into recent outages to see the proof.

There is now a substantial body of evidence that:

- Badly planned and mismanaged outages are being recorded as unplanned outages.
- Outages are extending due to human error, knowledge attrition and mismanagement.
- Replacement work is driving unplanned outages and not the other way round.
- Outages that are caused by human error are being attributed to other categories.

The long term interests of the consumer are best served by targeted efficient expenditure. Rigorous post event investigations are urgently required along with an open and honest analysis. It is evident and highly concerning that management and systems' failure is being disguised as asset deterioration and failure.

In summary:

- Aurora's Schedule 10 Information Disclosure needs to be the subject of an urgent and detailed investigation.
- Aurora's DPP3 variation should be declined.
- The maximum allowable revenue of the CPP should be reduced to that of the original DPP3 determination.
- Aurora must disclose individual unplanned outage data, investigations and classification.
- Your draft determination would be flawed if it were based on incorrect information, comparisons or assumptions.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Rob Douglas', with a large, stylized flourish above the name.

Rob Douglas
CMEngNZ CPEng IntPE