





19 July 2023

Andy Burgess
Commerce Commission
44 The Terrace
Wellington 6140
By email: im.review@comcom.govt.nz

Dear Andy,

Input Methodologies (IM) review – Submission of expert report July 2023

Who we are:

We are a collaborative group of three price-quality regulated gas distribution businesses (GDBs) in New Zealand - FirstGas, PowerCo, and Vector. We formed in 2021 in light of the recent gas default price-quality path reset.

Expert report submission:

The group is submitting Oxera's report 'Response to the New Zealand Commerce Commission's draft decision for Part 4 Input Methodologies Review 2023 on the cost of capital relating to the gas sector' in response to the Commerce Commission's draft decision on the IM review.

We would welcome further discussion with you on any aspects of the report.

Your sincerely,



Richard Sharp - on behalf of the Group