

8 August 2018

Sara Carter  
General Manager, Commercial and Regulatory  
Alpine Energy Limited  
24 Elginshire Street PO Box 530  
Timaru 7940

by email

Dear Sara

**Alpine Energy: 2018 Information Disclosure exemption request response**

1. We refer to your email of 26 June 2018 in which you requested the Commerce Commission (Commission) to grant an exemption to Alpine Energy Limited (Alpine) from the requirements of clause 2.12.1 of the Electricity Distribution Information Disclosure Determination 2012, as amended in December 2017 (ID Determination).

*Background to the request*

2. Clause 2.12.1 of the ID Determination outlines the steps that an EDB needs to take once it identifies material error in previously disclosed information.
3. Alpine published its 2018-2028 Asset Management Plan (AMP) in March 2018. The AMP was accompanied by forecast schedules (Schedules 11a – 12d) in MS Excel spreadsheet format.
4. In your email you have indicated that an error has been identified in the MS Excel version of Schedule 11a – Report on forecast capital expenditure.

Category	Incorrect numbers published in the Excel spreadsheet	Correct numbers used in the main body of the AMP disclosure <sup>1</sup>
	For year ending 31 March 2018 (in nominal dollars)	For year ending 31 March 2018 (in constant dollars)
Consumer connection	2,850	2,200
System growth	2,851	6,571
Asset replacement and renewal	2,852	5,857
Asset relocations	2,853	2,000

<sup>1</sup> Section 8.3 on page 132 of the Asset Management Plan

*Exemptions requested*

5. You have indicated that the error occurred when numbers from “Consumer connection” were inadvertently copied down to “System growth”, “Asset replacement and renewal”, and “Asset relocation”.
6. You have requested that Alpine be granted the exemption from the requirements of the error disclosure provisions of clause 2.12.1(1)(e) of the ID Determination which requires Director’s Certification alongside re-disclosed information given that:
  - 6.1 The correct numbers were published in constant dollar terms, given to the Board for certification and were published in the main body of the AMP.
  - 6.2 The error was caused in the spreadsheet and is not an update to the published numbers, and there has been no change in the forecast.
  - 6.3 Alpine intends to publish the corrected Schedule 11a along with the notes page explaining the correction to the schedule which corresponds with clauses 2.12.1(1)(a) to (c).

*Exemptions granted*

7. The Commission considers the exemption request reasonable given that the error occurred due to a spreadsheeting error rather than any change in forecasts.
8. Under clause 2.11.1 of the ID Determination, the Commission grants Alpine exemption from the requirements of clause 2.12.1(1)(e).
9. This exemption only applies to disclosure year 2018.

*Further information*

10. This exemption may be revoked or amended in accordance with clause 2.11.1(2) of the ID Determination.
11. A copy of this exemption response letter will be published on the Commission’s website.
12. For any further questions relating to this letter, please contact Vedika Sachan on (04) 924 3728 or [vedika.sachan@comcom.govt.nz](mailto:vedika.sachan@comcom.govt.nz).

Yours sincerely



Sue Begg

Deputy Chair