



20 April 2022

## Submission to the Commerce Commission on the Targeted Information Disclosure Review — Electricity Distribution Businesses, Process and Issues Paper, 23 March 2022

Electra Limited (Electra) welcomes the opportunity to submit on the *Targeted Information Disclosure Review – Electricity Distribution Businesses, Process and Issues Paper*, 23 March 2022 (the Process and Issues Paper). Nothing in this submission is confidential.

Electra owns and operates the electricity lines and assets in the Kapiti and Horowhenua districts. We are locally owned through the Electra Trust and have 45,700 beneficiaries that are the consumers connected to our network. We are an exempt electricity distribution business (EDB) under s54D of the Commerce Act 1986 (the Act).

Overall, we believe that the Commerce Commission's (the Commission) proposed changes to the Information Disclosure Regulation<sup>1</sup> (IDs) are well intended. We support providing information to our stakeholders on our decarbonisation journey and evidencing how we actively support New Zealand's decarbonised future. However, we do not believe that the IDs are the right mechanism to meet that purpose in all instances proposed by the Commission in its Process and Issues Paper. We are concerned that several of the Commission's proposed changes to the IDs:

- will result in pseudo regulation of exempt EDBs, which is not the intention of Part 4,
- are doubling up on existing reporting obligations and therefore are a duplication of effort for no gain to stakeholders, and
- are more complex to implement than the Commission realises, questioning the cost versus benefits of the measures included as an ID requirement.

In our *Feedback on fit for purpose regulation* dated 28 May 2021 (our feedback) to the Commission's Open Letter,<sup>2</sup> we stated that —

*'Changes to the information disclosure requirements should not be used to regulate exempt EDBs prices or quality standards.'*

The justification for many of the proposed changes to the IDs, and in particular the quality standards, reference the Commission's decision to apply additional information disclosure

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<sup>1</sup> Commerce Commission, Electricity Distribution Information Disclosure Determination 2012, consolidating the principal amendments as at 9 December 2021.

<sup>2</sup> Commerce Commission, Open letter — ensuring our energy and airports regulation is fit for purpose, 29 April 2021 (the Commission's Open Letter).

requirements on Aurora Energy, following its customised price-quality path (CPP) application. We believe that this is not appropriate on two grounds:

- i) while all EDBs are subject to the IDs, not all EDBs are subject to the Default Price-quality Path<sup>3</sup> (DPP) under Part 4; therefore, setting IDs based on the precepts of the DPP is, in effect, pseudo-price-quality regulation; and
- ii) the reporting requirements imposed on Aurora Energy were under extenuating circumstances and are not representative of usual EDB practices.

Part 4 explicitly excludes consumer-owned EDBs from price and quality regulation because our consumers can directly affect the level of services they receive and the prices they pay. At the same time, though well-intentioned several of the Commission's proposed changes are tantamount to quality regulation, which is not the intention of Part 4.

In its Process and Issues Paper, the Commission has proposed implementing the changes in two tranches. Tranche 1 in September 2022 and Tranche 2 in mid-2023. The Paper is silent on the disclosure year when the proposed change will take effect. Accordingly, we have assumed that the Commission intends the proposed change to take effect the disclosure year following the determination. Tranche 1 will take effect on 1 April 2023 and Tranche 2 on 1 April 2024.

We believe that these implementation dates are too tight for EDBs' to collect, quantify, and report meaningfully. We recommend that the Commission consider giving EDBs' a full disclosure year from the determination date for the proposed changes before they take effect. For example, Tranche 1 changes, if implemented in September 2022, would take effect for the 1 April 2024 disclosure year.

Included in Appendix A are our views on the proposed ID changes—

Table 1 — **quality services**

Table 2 — **decarbonisation**

Table 3 — **asset management**

Table 4 — **aligning ID with other regulatory rules**

Our views on all other matters are expressed in the industry feedback provided by the Electricity Networks Association (ENA).

Should you have any questions, please contact Joseph Prasanth, Network Planning and Development Manager, in the first instance at [REDACTED]

Sincerely



Dylan Andrews  
GM Lines Business

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<sup>3</sup> Commerce Commission, Electricity Distribution Services Default Price-Quality Path Determination Path, [2019] NZCC21, 27 November 2019.

## Appendix A—our comments on the proposed ID changes

Table 1: statement of our views on the potential ID changes related to quality services in the Process and Issues Paper

Potential measures			Our views on the proposed changes
Q1	T1	Expand ID requirements related to how much notice of planned outages is given to consumers, including planned outages that are booked but not carried out.	<p>We <b>support</b> this potential ID change in principle but are concerned by the lack of detail as to how the Commission intends to apply this additional ID requirement.</p> <p>From a consumer's perspective, such a measure is useful as it would encourage early communication of planned work. We can also see some internal benefits around highlighting particular types of work or locations that are more prone to cancellation.</p> <p>However, we consider the practicalities of the effort needed to collect the information and how useful comparison between EDBs will be as a performance measure, bring into question the cost vs. benefit of these requirements.</p> <p>For example, some EDBs only issue Planned Network Outages (PNOs) through the retailers. In contrast, others manage the process themselves. The time difference between distributors may be less about performance and more about how many touchpoints the PNO has before reaching the consumer.</p>
Q2	T1	Add ID requirements on power quality	<p>We <b>do not</b> support this potential ID change as existing technical network regulations already require measuring power quality, and therefore there is no benefit in making this an ID requirement. Therefore, adding this requirement under the IDs introduces costs without gains to stakeholders.</p>
Q3	T1	Add ID requirements on time taken to set up new connections.	<p>We <b>support</b> this potential ID change as this is a known pain point within the industry and warrants an industry workshop to resolve.</p> <p>As many EDBs will not currently have systems in place to collect the necessary information to support this requirement, we recommend that the Commission:</p> <ul style="list-style-type: none"> <li>i) apply measurement rules that are objective, and</li> <li>ii) introducing this requirement as part of Tranche 2, i.e., mid-2023, to give it and EDBs time to consider how this measure might be executed.</li> </ul>

Potential measures			Our views on the proposed changes
Q4	T1	Add ID requirements on customer services, e.g., customer complaints.	<p>We <b>do not</b> support this potential ID change as this information is already available through Utility Disputes; therefore, including this as an ID requirement would be a duplication of effort for little or no benefit to stakeholders.</p> <p>We believe that the problem is that consumers are not necessarily aware of the Utilities Disputes' work. The Electricity Authority recently raised consumer awareness of Utilities Disputes and Powerswitch services<sup>4</sup> by requiring retailers and EDBs to provide clear and prominent information about both services when communicating with consumers. Accordingly, the Commission's proposed change to add a customer complaints requirement is already covered by the work being promoted by the Electricity Authority and is, therefore, unnecessary duplication.</p>
Q5	T1	Add ID requirements on information about customer charters and guaranteed service level (customer compensation) schemes, e.g., information about existing schemes and information relevant to such schemes in the future.	<p>We <b>support</b> this potential ID change in principle and on the basis that:</p> <ul style="list-style-type: none"> <li>i) retailers are required to release information on customer charters as a function of the Consumer Care Guidelines, and under the DDA, EDBs are obligated to support retailers to meet their requirements, and</li> <li>ii) for those EDBs with guaranteed service levels releasing information about the scheme is sensible.</li> </ul> <p>However, that is not to say that we support the mandating of guaranteed service levels by the Commission. The application of customer compensation is a matter covered by the DDA, which is in the remit of the Electricity Authority. We believe that the Commission should not set regulations already covered by another regulator.</p>
Q6	T1	Expand ID requirements on response time to outages.	<p>We <b>support</b> this potential ID change as measuring response times to outages will help EDBs identify areas for improvement, including equipment, personnel location, and requirements for additional smarts/sensors.</p> <p>Such a requirement may also be useful to drive down SAIDI further as it could drive an incentive to dispatch the nearest capable resource to assist. Further improvements might be driven by the incident, outage, and case management tools – for receipt of an outage, enroute information, onsite information, estimated times of arrival, update and progress reporting, and personnel statistics. This information can be used to improve our staff's welfare and safety opportunities.</p>

<sup>4</sup> More information can be found on the Electricity Authority website at <https://www.ea.govt.nz/development/work-programme/consumer-choice-competition/raising-consumer-awareness-of-utilities-disputes-and-powerswitch-services/>

Potential measures			Our views on the proposed changes
			In executing the approach for this requirement, the Commission should be mindful that faults not cleared within 3 hours are already reported and are currently used to show the trend of how EDBs are responding. If the Commission intends to make the requirement apply to all faults, we are unsure what additional insights such a measure would bring, as EDBs already look at worst performing feeders.
Q7	T2	Expand forward-looking AMP requirements on how EDBs will continue to perform for consumers, e.g., commitments to develop the network for future technology.	We <b>do not</b> support this potential ID change as this appears to be a double-up with the proposed ID changes related to asset management. Accordingly, this measure might be more appropriately considered as a potential change to the IDs related to asset management.
Q8	T1	Add ID requirements on the Momentary Average Interruption Frequency Index (MAIFI) to capture momentary interruptions that can be hidden or misrepresented by existing SAIDI and SAIFI requirements.	<p>We <b>support</b> this potential ID change as MAIFI could provide further insights into feeders' performance from an operational perspective. Further, there could be long-term benefits from EDBs reconfiguring, sectionalising, and deploying smart devices onto their networks.</p> <p>However, in extrapolating the data or comparing performance between EDBs, the Commission must be mindful that MAIFI performance is likely to show:</p> <ul style="list-style-type: none"> <li>• urban networks in a good light</li> <li>• networks such as Electra in mixed light, and</li> <li>• very stringy networks in a poor light.</li> </ul> <p>EDBs, if directly compared under this performance measure, would need to be suitably grouped.</p> <p>The Commission has proposed that this potential change be included in its Tranche 1 changes, i.e., September 2022. Where EDBs have a smart device (SCADA), MAIFI is easily achievable and can be derived from Milsoft. This capability may not be true for all EDB's making the timing likely unachievable for many. At an LV level, smart meter data might be useful. However, this relies on third-party infrastructure, and availability may be inconsistent across the EDBs.</p> <p>The short-term difficulties in implementing this measure may make it necessary for the Commission to push this out to be a Tranche 2 change, i.e., mid-2023 (TBA) if it chooses to proceed with this proposed change.</p>

Potential measures			Our views on the proposed changes
Q9	T1	Add ID requirements regarding those customers worst served on the network in terms of reliability. We had some requirements in this areas in the regime that came before Part 4, but questions were raised about the value of the disclosed information in light of technical challenges producing it. We welcome feedback from EDBs in particular on the feasibility and usefulness of such information.	<p>We <b>do not</b> support this potential ID change as EDBs already utilise this information as part of good industry asset management practices; therefore, there is no benefit in making this an ID requirement.</p> <p>We appreciate why the Commission requested this information in the case of Aurora Energy, as stakeholders raised issues about the equity of historical investment in different areas supplied by Aurora Energy. In the instance of Aurora Energy, the data was being used to substantiate a suspected problem and then monitor performance. In its Process and Issues Paper, the Commission has not evidenced a general issue across EDBs; rather, it appears to be simply a case of bringing back what has been reported. If general information on worst-performing feeders were useful, the Commission would surely have brought it into Part 4 from the former targeted threshold regime, i.e., pre-2010.</p>
Q10	T2	Expand ID requirements to include disaggregated SAIDI and SAIFI by network category (e.g., urban and rural) and region.	<p>We <b>do not</b> support this potential ID change as the costs of making this an ID requirement will outweigh the benefits. For example, most of our zone substations are in urban areas, with feeders running out to rural areas; distinguishing zone areas would require us to install smart devices at our network's notional urban/rural boundaries.</p> <p>Over recent years, the blurring of urban and rural living has been exacerbated by Covid-19 and flexible work arrangements. More and more people work from home, and home is becoming a lifestyle choice. Consumers demand consistent service levels for their homes irrelevant to their choice of living style, i.e., urban or rural.</p>
Q11	T1	Refine ID requirements on interruptions by clarifying definitions to ensure successive interruptions are recorded consistently	We <b>support</b> this potential ID change as it will help consistent reporting between EDBs.
Q12	T1	Refine ID requirements or add guidance on assigning interruptions to cause categories.	We <b>support</b> this potential ID change as guidance will help consistency between EDBs.
Q13	T1	Refine ID requirements on third-party interference interruptions by breaking down into more specific categories, such as vehicle damage, "dig in," overhead contact, and vandalism.	<p>We <b>support</b> this potential ID change as further categorisation of third-party interference would be beneficial at an incremental cost, i.e., the benefits outweigh the costs.</p> <p>In our case, we could collect this information with a minor modification to Milsoft/Clevest. Benefits would include having more data around incidents on our network, including equipment, physical location, construction method, labelling, warning hazard information, and location data history</p>

Potential measures			Our views on the proposed changes
			<p>provided to third parties. Recording theft or vandalism, collisions due to motor vehicles, and damage by the approved contractor would assist us in quantifying costs and justifying charges to third parties and spending relating to safety through education and marketing campaigns.</p> <p>More information about third-party interference would also help us determine what level of reactive expenditure we need to budget for each year. Provides a basis for measuring improvement, especially where education campaigns are undertaken, the benefits of which are difficult to quantify.</p>
Q14	T2	Expand ID requirements to include some raw outage data, which is currently only provided to us by non-exempt EDBs in advance of price-quality path resets.	<p>We <b>do not</b> support this potential ID change as the IDs have a different purpose to the DPP, and accordingly, it is not appropriate that a DPP measure be interchangeably applied under the IDs. While we can appreciate the Commission's want for synergies between the DPP and the IDs to reduce duplicating effort, it is not appropriate that information collected for two very different purposes is entwined.</p>

Table 2: our comments on potential ID changes related to decarbonisation in the Process and Issues Paper

Potential measures			Our views on the proposed changes
D1	T1	<p>The range of changes that could be made to ID for EDBs to provide more information on their LV networks falls along a spectrum. At the more prescriptive end of the spectrum, there could be a requirement for EDBs to provide detailed and potentially much more frequent information about metrics of their LV network, such as those on capacity and power quality.</p> <p>A less prescriptive approach would be for EDBs to disclose their plans to develop and improve their LV network practices. This would be similar to the approach adopted for Aurora.</p> <p>We welcome feedback from stakeholders on the appropriate approach to take.</p>	<p>We <b>do not</b> support this potential ID change as the Electricity Authority attempts to address the data access through the DDA (i.e., Appendix C provision of consumption data provisions) represents an industry-wide solution, whereas the IDs are EDB centric. We believe that the data access issue needs greater industry discussion, and the IDs are not the right mechanism to facilitate that discussion.</p> <p>The IDs are an EDB only focused solution that does not bring the retailers or meter equipment providers (MEPs) to the table. An alternative solution would be for the Commission to support an industry-wide consultation on how the industry might solve this issue. An industry-wide approach is necessary as practicalities such as commercial arrangements, pathways for accuracy, and privacy are complex issues that need sophisticated solutions. We believe that the IDs are the wrong approach as it is too dull a mechanism to solve such a complex issue.</p>
D2	T1	<p>There are various approaches that could be used to require EDBs to report more consistently and provide greater transparency, which would allow stakeholders to better understand the magnitude and effect of new large electricity loads on EDBs' networks. One example of this would be a requirement for an EDB to identify and report on the top 10 fossil-fuel loads in their area that could convert to electricity and the effect on their network, and how they were preparing.</p> <p>Alternatively, a threshold (either absolute or proportional) could be introduced, which</p>	<p>We <b>do not</b> support this potential ID change as a prescribed ID requirement is likely to conflict with the provisions of non-disclosure agreements (NDAs). Further, we do not currently have the process to collect this information. Even if we create the processes, customers are unlikely to share such information with EDBs, particularly if there is a risk that the information will be publicly disclosed.</p> <p>We believe that the provisions currently in the AMPs provide the appropriate platform for communicating EDBs' opportunities to meet specific consumer needs at a high enough level to be useful, but not at the level of details that risks breaching the provisions of NDAs. Suppose the Commission believes that the information that EDBs have provided to date is lacking, then we recommend the Commission workshop their expectations with EDBs or release best practice guidelines for AMP development. We do not believe that a prescriptive ID requirement is a right solution.</p>



Potential measures		Our views on the proposed changes
		required EDBs to report this information on new loads above a certain size.
D3	T1	<p>We want stakeholders to be better able to understand the current and likely future constraints on EDB networks. This includes helping those providing new technology or services to be able to plan to compete to offer a solution to the constraints and helping those planning to connect to the system to choose where to locate. There is a spectrum of options, from simply requiring EDBs to report on their plans and progress and different scenarios in this area, to more prescriptive approaches that could require EDBs to provide information on current and expected constraints in a standardised (geo-spatial) format.</p> <p>We want to understand how ID can help facilitate a shift to national level reporting of constraints with an approach that does not impose an unnecessary regulatory burden on EDBs.</p> <p>For example, would simply expanding the requirements so that they apply to all EDBs be sufficient or do the existing requirements not capture all of the information necessary to properly explain the full nature of a constraint.</p>
D4	T1	<p>There are various options, but one approach might be to require EDBs to specifically report their innovations practices in a stand-alone way in terms of:</p> <p>We <b>do not</b> support this potential ID change as we do not believe this needs to be an ID-driven solution and making this an ID requirement does not give EDBs the support we need. To paraphrase, we need more 'innovation and less administration,' and making this proposed ID change represents more administration.</p>

Potential measures		Our views on the proposed changes
	<p>(a) what measures are EDBs taking that are innovative;</p> <p>(b) why are they innovative;</p> <p>(c) what EDBs are trying to achieve by carrying out the particular innovation; and</p> <p>(d) how EDBs are measuring their success</p>	<p>More innovation might come in the form of more funding to support innovation. We appreciate that the uptake of funding mechanisms has been low to date. The reasons for the low uptake are many and varied. Not least is the level of certainty of outcome that many funded mechanisms demand. We would like to see the Commission supporting a mechanism with an underlying approach of innovating, adapting, and adopting.</p>
D5	T1	<p>Currently ID requires EDBs to report on their activities related to distributed generation. However, the requirements to do not cover all flexibility resources, such as demand response. Further, there is no requirement for EDBs to make a specific declaration regarding the investigations and investment they have undertaken into exploring flexibility resources, as an option to provide innovative, cost effective and reliable electricity distribution services.</p> <p>We <b>support</b> this potential ID change as noted by the Commission; this change reflects recommendations from the Innovation and Participation Advisory Group (IPAG) concerning areas such as equal access and the review of Transpower's Demand Response.</p> <p>In setting this measure, the Commission will need to be mindful that:</p> <ul style="list-style-type: none"> <li>the barriers to entry to distributed energy resources (DER), such as flexibility services is a wider market structure issue than EDBs not evidencing that their systems support DER, and</li> <li>there are likely to be non-disclosure agreements (NDA) between EDBs and providers of flexibility services that will limit the release of information specific to projects.</li> </ul> <p>Without careful consideration of the practicalities of this requirement, there is the very real possibility that the information disclosed will be time-consuming and of very little benefit, i.e., the costs will outweigh the benefits.</p>
D6	T2	<p>Refine current requirements by providing standardised price components and/or price categories that EDBs can record revenue against in addition to a free field for revenue that does not fit one of the standardised categories or components.</p> <p>We <b>support</b> this potential ID change in practice, as standardisation would be helpful for retailers and consumers. The Commission may need to take into account:</p> <ul style="list-style-type: none"> <li>discounts used by several exempt EDBs and failing to do so has the potential to skew prices, and</li> <li>MBIE currently collects and publishes pricing information, which could cause confusion if multiple bodies publish materially different prices.</li> </ul>

Table 3: our comments on potential ID changes related to asset management in the Process and Issues Paper

Potential measures			Our views on the proposed changes
AM1	T1	<p>Possible improvements to improve the specificity of asset age data disclosed under ID include:</p> <ul style="list-style-type: none"> <li>• Finding an appropriate way to report what is currently designated as 'unknown' in the asset age category; and</li> <li>• Splitting out asset age data at a level that is more granular than by decade for assets installed before 2000.</li> </ul>	<p>We <b>support</b> this potential ID change as rigorous asset age and condition data supports good industry practice asset lifecycle management.</p>
AM2	T2	<p>Identifying cost categories with known or observable relationships to other data that can enable better understanding of the efficiency of EDBs' expenditure plans. Unit costs are one basic approach we might explore, including:</p> <ul style="list-style-type: none"> <li>• Capex unit costs e.g., asset replacement cost per unit (poles, conductors, transformers etc.); and</li> <li>• Opex unit costs e.g., vegetation management expenditure/per km cut.</li> </ul>	<p>We <b>support</b> this potential ID change in principle. However, we have concerns about how the Commission will account for the different operating models and network characteristics of EDBs.</p> <p>The Commission will need to provide specific guidance on the unit costs and the basis of capture, e.g., overhead (O/H) lines replacement, including or excluding poles, cross arms, etc. The risk is that the measures will be used for overly simplistic benchmarking of EDBs costs to serve. And from that benchmarking, EDBs will be unfairly ranked, resulting in further pressures to regulate expenditures, including for the exempt EDBs. A similar approach was attempted under the changes to the reporting of related party transactions but not well achieved.</p> <p>This is a Tranche 2 proposed change, and accordingly, we have reserved detailed discussion until the release of the draft determination when we have more information about this measure.</p>
AM3	T2	<p>There is a wide spectrum of information that may be useful to stakeholders, as well as various options for presentation in terms of format and location within the AMP. We are seeking feedback from stakeholders on the key information that</p>	<p>We <b>support</b> this potential ID change as it is a simple change that will add value.</p> <p>This change could be achieved through a standardised dashboard at the front of the AMP. The initial design might take some effort and could be driven by ENA.</p>

Potential measures		Our views on the proposed changes
		stakeholders would like to be most accessible and the most useful manner it can be presented within an AMP. One approach to receiving this feedback may be through a user group forum to inform areas of interest.
AM4	T2	<p>Improved reporting on the resilience and contingency planning of an EDB's network could be enabled through ID changes, which we note would consequently support the work of the EA and other stakeholders. We are seeking feedback on how disclosure requirements could capture more comprehensive information on resilience and contingency planning.</p>
		<p>We <b>support</b> this potential ID change in principle as potentially, this information is already captured in most EDBs' risk management systems.</p> <p>This is a Tranche 2 proposed change, and accordingly, we have reserved detailed discussion until the release of the draft determination when we have more information about this measure.</p>
AM5	T2	<p>Require a summary report of each significant storm event. This could be informed by internal reporting and recording that could include the following:</p> <ul style="list-style-type: none"> <li>wind speed and wind direction data; and</li> <li>whether the wind speed actually exceeded the design tolerances of the network.</li> </ul> <p>We are seeking further feedback on this from stakeholders to achieve a cost-effective solution that is useful to stakeholders.</p>
		<p>We <b>do not</b> support this potential ID change as it is a double-up of the existing requirement under clause 12.4 of the DPP to provide a desktop investigation of the events resulting in a non-exempt EDB breaching its unplanned quality standards. Accordingly, it is not appropriate that this also be an ID requirement.</p> <p>An alternative solution is that the Commission releases best practice guidelines around significant storm event reporting. The guidelines would need to cover areas such as:</p> <ul style="list-style-type: none"> <li>definitions, e.g., 'significant storm,'</li> <li>determination method for the physical area impacted, and</li> <li>acceptable weather station density.</li> </ul> <p>Non-exempt EDBs could utilise the guidelines to meet the requirements of clause 12.4 of the DPP. And exempt EDBs could use the guidelines to inform their internal reporting of significant storm events, which feeds into their asset lifecycle management systems.</p>
AM6	T1	<p>Potential changes to the definition of 'overhead circuit requiring vegetation management' so that it is based upon a</p>
		<p>We <b>support</b> this potential ID change in principle as it could address the inconsistency in current reporting.</p>

Potential measures		Our views on the proposed changes
		<p>maximum distance between vegetation and an overhead circuit. We welcome feedback on what this distance should be or how else it can be consistently defined in the ID determination.</p>
AM7	T1	<p>Potential changes to the lifecycle asset management planning provisions to:</p> <ul style="list-style-type: none"> <li>(a) include vegetation management-related maintenance; and</li> <li>(b) include sufficient detail on the assumptions, modelling and economic justifications underpinning the relevant policies, programmes, actions and expenditure projections of each asset category.</li> </ul>
AM8	T1	<p>Potential changes to the lifecycle asset management planning provisions to:</p> <ul style="list-style-type: none"> <li>(a) include the processes and systems used to gather and verify the data used to forecast asset replacement and renewal projects and programs; and</li> <li>(b) provide sufficient detail on the assumptions, modelling, and consideration of non-network alternatives underpinning the methodology used by the EDB to determine the forecast expenditure within the AMP planning period.</li> </ul>

Potential measures			Our views on the proposed changes
AM9	T1	We welcome further stakeholder feedback on whether it may be beneficial if EDBs were to disclose an explanation and exploration of scenarios, in addition to providing a single point forecast in their forecasting schedules, and if so, in which areas and format would this be most useful.	We <b>do not</b> support this potential ID change as it adds a level of complexity to the AMPs with very little discernible gain.  An alternative approach is to workshop an approach through the ENA that EDBs could adopt for internal use. An industry lead approach is more likely to result in a consistent scenario approach uptake across EDBs.
AM10	T1	Change the relevant provisions so that stakeholders can understand the number of forecast disconnections on an EDB's network.	We <b>support</b> this potential ID change and request that the Commission address the inconsistency between schedules 12c and 9e regarding the reporting of new consumer connections.  The Commission's review should include reviewing the usefulness of this information and clarifying definitions. We question the usefulness of reporting the number of new connections whether or not the reported figure is net of disconnections.
AM11	T1	Potential changes to enable ID data to better inform stakeholders' understanding of EDBs' expenditure proposals. Capex forecasts (particularly in the context of decarbonisation and technological change).	We <b>support</b> this potential ID change as the requirement supports cross-reflective pricing.

Table 4: our comments on potential ID changes related to Aligning ID with other regulatory rules in the Process and Issues Paper

Potential measures			Our views on the proposed changes
A1	T2	Changes proposed to the relevant clauses to ensure consistency of definition of "recoverable and "pass through costs."	We <b>support</b> this potential ID change as the alignment of definitions is helpful.
A2	T2	As part of this change, we will consider whether to amend the definition of 'asset or assets with changes to depreciation.'	We <b>support</b> this potential ID change as the Commission only intends for this measure to apply to non-exempt EDBs that have successfully applied for adjustment factor applications. We recommend the Commission explicitly state that this reporting requirement only applies to non-exempt EDBs in the draft determination to avoid confusion.