

12 March 2020

Matthew Lewer
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By email to regulation.branch@comcom.govt.nz

Dear Matthew,

Amendment to IMs and DPP3 – Correction to discount definition

The ENA appreciates the opportunity to provide feedback to the Commission on this matter which corrects a small error in both the IM and the DPP3 Determination for non-exempt EDBs.

We fully support the proposal to correct this error – the amendment reflects what was intended and expected. It demonstrates regulatory predictability. Amending the IM's and the Determination in lockstep is an appropriate solution.

We also support a timely and efficient process for addressing the rare and inevitable issues with drafting and implementation when they are non-controversial and consistent with the policy intent. Addressing these quickly and efficiently will reduce the resource and time requirements for the industry and the Commission.

These same comments apply in the context of the consultation on the reconsideration of the Powerco and Wellington Electricity CPPs following the WACC change. These consultations appear to involve even more work and documentation to fix implementation errors.

Overall though it is important to fix the errors so that EDBs are able to recover the 'right' amount of revenues.

Kind regards,



David de Boer
Principal Advisor