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## Targeted Information Disclosure Review – Electricity Distribution Businesses

Genesis Energy welcomes the opportunity to provide feedback on the Commerce Commission's draft decisions on Tranche 1 of the targeted information disclosure (**ID**) regime for electricity distribution businesses (**EDB**).

In principle, Genesis favours consistency between EDBs where possible, accounting for the different circumstances networks face due to geography and their customer profiles. Consistency reduces regional inequities that can emerge between consumers on different networks, and reduces costs for nationwide retailers. Significant variation in management practices between networks can be a barrier to innovation by retailers and is to be avoided where possible.

As the Commission notes, EDBs are increasingly impacted by a rapidly changing electricity industry and are facing new and emerging demands on their network management practices. It is imperative that EDBs are able to find innovative, low-cost methods of contributing to decarbonisation and enabling new consumer choices. This is an important consideration in how these businesses are regulated. An effective ID regime is a useful, light touch tool in ensuring EDBs are playing their part without acting as a barrier to innovation.

Genesis supports the staged approach to introducing the targeted ID requirements, which provides for issues to be addressed as they arise.

In general Genesis considers the proposed reporting requirements seem reasonable. That said, EDBs will be best placed to comment on what is reasonably practicable from a data

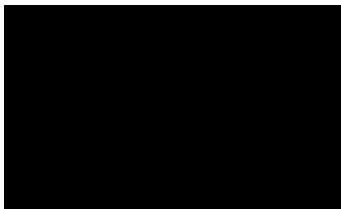
collection and reporting perspective. We urge the Commission to be mindful of striking a balance between collecting and publishing useful information, and overburdening EDBs whose highest priority remains ensuring a safe and supply of electricity to consumers.

Related to this, some of the reporting timelines for 2023 seem tight and it is uncertain whether all EDBs will be in possession of the data required when the first deadlines arrive.

Genesis anticipates there will be some variation in what information networks will be able to provide, as a consequence of their agreements with retailers. For example, in respect of planned outage information, where retailers manage planned outage communications for EDBs these networks will only be able to report when they notified retailers on their network. They will not have visibility of when, or if, the retailer notified customers. Variations like this will not always be negative and, where they arise, the wider context should be taken into account.

Please do not hesitate to contact me if you wish to discuss any aspect of this submission.

Yours faithfully



Matt Ritchie  
**Senior Advisor, Regulatory Affairs and Government Relations**