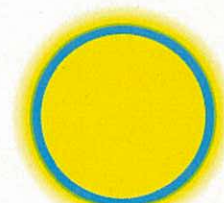


19 July 2010

Dr Mark Berry  
Chair  
Commerce Commission  
P O Box 2351  
Wellington

**POWERCO**



Dear Dr Berry

**Extension of time for response on GPB Draft Decisions**

We refer to Allan Carvell's letter (for Vector) to the Commission of 16 July 2010 regarding application of the time extensions granted for Electricity Distribution Business (*EDBs*) to Gas Pipeline Businesses (*GPBs*). Powerco supports and reiterates Vector's request, for similar reasons:

- Powerco had also understood that any extension would apply equally to GPBs given the common issues and the identical volume of material requiring a response. GPB papers and EDB papers have always followed the same timeframes for this reason.
- The extension for EDBs serves little purpose for Powerco if it does not apply to GPBs as otherwise Powerco will effectively still have to provide its substantive responses according to the original timetable. The steps required to respond to the Commission's reasoning for EDBs and GPBs are the same (indeed Powerco's submissions have always covered both GPBs and EDBs).
- Further, Powerco's experts will be responding to both GPB and EDB papers together, as have the Commission's experts. We emphasise that the reasons for an extension set out in the ENA letter of 6 July 2010 apply equally to Powerco's GPB businesses.

The current timetable for GPBs does not provide Powerco with sufficient time to make a meaningful response in relation (in effect) to EDBs and GPBs. There appears to be no good basis for agreeing an extension for EDBs but not GPBs.

We look forward to your urgent response.

Yours sincerely

Paul Goodeve  
**Regulatory and Business Manager**