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Infrastructure Regulation Branch  
Commerce Commission

**BY EMAIL:** [REDACTED]

## **UNISON AND CENTRALINES CROSS-SUBMISSION ON TARGETED INFORMATION DISCLOSURE REVIEW – TRANCHE 1 DRAFT DECISION**

Unison and Centralines welcome the opportunity to provide this cross-submission on the Commerce Commission's tranche 1 draft decisions for its targeted information disclosure (ID) review.

This cross-submission focusses on key themes that we have observed in submitters' comments. Nothing we have observed in others' submissions has caused us to reconsider the detailed comments that we provided on each proposed amendment within our main submission.

### ***Alignment with existing regulation***

In our main submission, we noted that there was inconsistent alignment between some of the requirements of proposed ID amendments and similar requirements specified in the default price-quality path determination (DPP). Our view remains unchanged, that the ID requirements must be properly reflective of the compliance aspects of Part 4 in order to be effective.

Our views are supported by others. Aurora Energy, Counties Energy and Northpower have all noted the inconsistent treatment of alternative days under proposed amendment Q1 (notice of planned interruptions), relative to notifications requirements specified by the Electricity Authority under Electricity Information Exchange Protocol 5A, and to the approach taken in Schedule 3.1 of the DPP3 determination.

We recommend that the Commission reviews its proposed amendments, prior to making its final decision, to ensure that they align with existing regulation, to the greatest extent practicable.

### ***Definitional clarity***

Several submitters indicated that, in their view, there are definitional short comings in some proposals:

- Counties Energy considered that the definition of 'planned interruption proceeding on time', specified in proposed amendment Q1 (notice of planned interruptions), was too loose and that it should be aligned to DPP3 requirements.
- Aurora Energy, Horizon Energy Distribution, Network Tasman, Network Waitaki, Northpower, PowerNet, The Lines Company, Vector and Wellington Electricity Lines all

expressed concern about the lack of precision in the quantitative disclosure requirements of proposed amendment Q3 (new connections).

- For proposed amendment AM10, Aurora Energy, Horizon Energy Distribution, Northpower, Orion and PowerNet all noted that the use of the 'decommissioned' status of ICPs, rather than the 'disconnected' status of, was much more likely to result in a disclosure that is aligned to the Commission's underlying concerns.

These issues underline the critical role of definitional precision if disclosures are to be useful and effective. Unison and Centralines support Vectors' recommendation that the Commission should hold a stakeholder workshop prior to making its final decision, to resolve these and similar issues.

### ***Timing and retrospectivity***

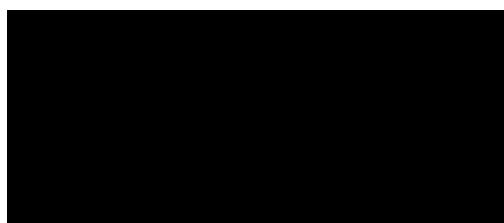
In our main submission, we noted our concern that some proposed amendments require EDBs to have had data collection and reporting process in place from 1 April this year, effectively creating a retrospective reporting requirement.

Additionally, some proposed amendments require data collection and reporting process to be created for implementation from 1 April 2023. With the final decision expected in November 2022, this leaves very little time for EDBs to design, construct/amend, and implement data collection and reporting mechanisms, especially when the festive break is considered, and having regard for the fact that EDBs' regulatory teams are very busy during this period coordinating year-beginning disclosures (asset management plans, pricing methodologies, price setting compliance statements).

Concerns with implementation timing, or the creation of retrospective reporting requirements, were noted by Aurora Energy, Electra, the Electricity Networks' Association, Horizon Energy Distribution, Network Waitaki, Northpower, Orion New Zealand, Powerco, PowerNet, The Lines Company, Vector, WEL Networks and Wellington Electricity Lines.

Among non-EDB submitters, Genesis Energy expressed some concern regarding timing and retrospectivity, noting that *"... 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."*

Having regard for the weight of these concerns, Unison and Centralines recommend that the Commission thoroughly reviews the implementation timing of the proposed amendments and aligns them to its other regulatory processes. In our view, accelerated implementation should only be considered if there is a critical process that is dependent on the disclosure, such as might occur if this review was being conducted closer to the DPP reset.



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