



04 October 2023

Infrastructure Regulation  
Commerce Commission  
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Tēnā koutou

### **Targeted Information Disclosure Review (2024) Draft Decision - Cross-submission**

WEL Networks (WEL) appreciates the opportunity to provide a cross-submission on the Commerce Commission's Targeted Information Disclosure Review (2024) Draft Decision.

WEL agrees with other submitters' feedback on the following topics:

1. Implementation should be delayed until the 2025 reporting year. Alpine, ENA, Northpower, Orion, Powerco, and Vector all note that the Commission's decision on changes to information disclosure requirements is due in February 2024, only weeks prior to reporting year 2024. We agree that EDBs will not be able to have auditable systems and procedures in place to capture and report the required data for reporting year 2024.
2. The time horizon for network constraint reporting (proposed within Schedule 12b) should align with the 10-year forecast horizon for EDB's Asset Management Plans. We agree with Alpine that "Extending these forecasts out another 10 years at a zone substation level will amplify variances. This will only serve to show the scope of uncertainty across the sector. It will not provide meaningful information for stakeholders about individual EDBs' ability to understand and address network constraints". Northpower, Horizon, Vector and ENA also support this change.
3. Changes to reporting vegetation management should be further discussed in a workshop with distributors, or at a minimum delayed until the review of the Trees Regulations is complete. If the Commission does not want to delay a decision on this topic, we support ENA, Alpine, and Network Tasman in their suggestion to adopt the vegetation management reporting required of Aurora Energy as part of its customised price-quality path Annual Delivery Report.
4. The proposal to change 'non-network solutions' to 'non-traditional solutions' requires further clarity from the Commission. WEL supports the Commission holding a workshop with distributors to discuss the intent of this change, develop clarity about the definition and identify / resolve any unintended consequences.
5. Standardisation of pricing categories should not be based on meter type. Aurora, ENA, Orion, Vector, and Wellington Electricity provide compelling rationales for not making this change.





6. Information required on the worst-performing feeders should be further refined. This is another topic that could be workshopped with distributors. ENA, Northpower, Orion, The Lines Company and Vector all provide useful suggestions which WEL supports.

Should you require clarification on any part of this submission please do not hesitate to contact me.

Ngā mihi nui

David Wiles

**Revenue and Regulatory Manager**

