

Electricity Networks Association

7th Floor, Wellington Chambers, 154 Featherston Street
PO Box 1017

Wellington, New Zealand 6140

Telephone: 64-4-471 1335 Fax: 64-4-496 5209

E-mail adj@electricity.org.nz

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John McLaren
Chief Advisor
John Hamill
General Manager Regulation
Commerce Commission
PO Box 2351
WELLINGTON

Email: regulation.branch@comcom.govt.nz

Request for extension for submission deadline for members

Dear John,

The Electricity Networks Association's (ENA) members are currently considering a large volume of consultation material which was issued by the Commerce Commission in July.

This material comprises a number of policy papers, proposed input methodology amendments and compliance matters associated with the forthcoming Default Price Quality Path for EDBs. In addition, the Commission is proposing a change to the cost of capital input methodology applying to EDBs.

Accordingly members are currently preparing submissions on eleven different consultation papers, plus over 30 supporting models and additional expert reports published by the Commission in support of the consultation material. The deadlines for submissions are 15 August and 29 August, with the majority of the submissions (9 of 11) due on 29 August. We note that the cross submission periods overlap, with cross submissions on the first two papers due at the same time as the submissions on the remaining papers.

This compressed consultation period is insufficient for the volume of material which must be considered and responded to. In particular our members are concerned that they will not be able to give sufficient attention to the papers with submissions due on 29 August. We note that a number of these papers propose substantial changes to the current regulatory arrangements, and they include a large volume of detailed drafting, which requires careful analysis and consideration.

Accordingly the ENA requests an extension to the 29 August deadline for the technical papers comprising the DPP Draft Determination, the Proposed Amendments to Input Methodologies and associated Draft IM Amendments (second type), and the Draft Incremental Incentive Scheme Input Methodology Amendments.

We request a two week extension for these papers to provide the additional time necessary for our members to adequately consider all of the consultation material recently published and prepare their submissions and cross submissions.

We note that submissions on the remainder of the papers will provide the Commission with views on the policy decisions necessary to finalise the DPP, including the various incentive mechanisms proposed, compliance requirements and the proposed approach to setting the DPP price path, including the proposed changes to recoverable and pass through costs.

We appreciate that the Commisiosn has a number of workstreams that must be completed in the current calendar year, and any extension granted will impact on your work programmes. However, we also consider that it is important that our members are provided with sufficient opportunity to respond to the proposals. In our view the current consultation timeframes compromise this. We would appreciate your urgent consideration of this request.

Please contact me if you have any questions in this regard.

Yours sincerely



Alan Jenkins

Chief Executive
Electricity Networks Association