



13 November 2024

Ben Woodham  
Electricity Distribution Manager  
Commerce Commission  
WELLINGTON

Email: [Infrastructure.regulation@comcom.govt.nz](mailto:Infrastructure.regulation@comcom.govt.nz)

Dear Ben

**Cross submission on proposed amendments to input methodologies for electricity distribution businesses – wash-up amounts**

On 31 October 2024, Orion submitted in support of the proposed changes for the calculation of wash-up balances and the limit on wash-up drawdown amounts. We note that the other submissions received by the Commission also support these changes.

Vector encouraged the Commission to make further changes to the input methodologies (IMs) to provide further clarity and to ensure that the ‘wash-up draw down amount’ is correctly calculated.

Orion supports measures to avoid uncertainty and to enable electricity distribution businesses to comply with the IMs. As such, we support the additional measures outlined in Vector’s submission. That is, to amend proposed clause 3.1.4(2A) or to include a definition of the “wash-up draw down amount” for the years before 2026 to ensure that the correct calculations are made.

We do not consider any part of this submission to be confidential. Please do not hesitate to contact me on [REDACTED] if you wish to discuss our submission.

Yours sincerely



Kelly Chapman  
**Regulatory Lead**

