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**SUBMISSION ON THE ‘ELECTRICITY AUTHORITY – COMMERCE COMMISSION JOINT PROJECT – SPOTLIGHT ON EMERGING CONTESTABLE SERVICES’ TERMS OF REFERENCE**

WEL Networks Limited (“WEL”) welcomes the opportunity to provide a submission on the Joint Project, Spotlight on Emerging Contestable Services Terms of Reference.

WEL is supportive of the long term protection of consumers and ensuring they gain the best possible outcome. The majority of EDB’s are community trust owned and therefore are directly benefiting their communities they serve through their works and actions.

WEL would like to note that under the title “why are we doing this”, there should be an additional focus on a “shared understanding of the types of circumstances where the participation of distributors in contestable electricity services is likely to be more beneficial to consumers”.

We note that; what you intend to produce eludes to potential efficiencies from vertical integration, the “why we are doing this” appears to focus primarily on the harm by participation of distributors.

WEL encourages the joint project to look at case studies as much as possible based on evidence not supposition. Given that many of the potential outcomes are eluding to technology that is in early adoption status, regulation should be principle based, not prescriptive, to give longevity. We would also encourage the use of workshops and one-on-one consultations as this allows for greater understanding than written submissions.

If you have any questions regarding WEL’s submission please contact Michelle Allfrey on 07 850 3143 or by email [Michelle.Allfrey@wel.co.nz](mailto:Michelle.Allfrey@wel.co.nz).

Yours sincerely

A handwritten signature in black ink, appearing to read 'Michelle Allfrey', with a large, stylized flourish at the end.

Michelle Allfrey  
**GM COMMERCIAL ENGAGEMENT**