

31 August 2022

Commerce Commission New Zealand
PO Box 2351
Wellington 6140
By E- Mail: infrastructure.regulation@comcom.govt.nz

Re: Submission on Targeted Information Disclosure Review on Electricity Distribution Businesses

Counties Energy Limited's submission is in regard to the Commerce Commission's (Commission):

- 'Targeted Information Disclosure Review – Electricity Distribution Businesses Draft decisions paper – Tranche 1 (the Paper) and;*
- Accompanying '[Draft] Electricity Distribution Information Disclosure (Targeted Review Tranche 1) Amendment Determination 2022'* (the draft determination)

Amendment Q1 – expand ID requirements related to how much notice of planned interruptions is given to consumers, including planned interruptions that are booked but not carried out.

Counties Energy is supportive of this being included in the ID, however as with many aspects of ID, our concern is having very specific definitions that are not open to interpretation. This is required to enable consistently applied reporting across different years and between different EDBs.

In particular, Counties Energy, and likely its peers, typically have a window of time for a planned outage with one alternative window of time i.e. in one year there are 100 planned interruptions, whereas there may have been 200 notified windows of time notified to customers. For the ID disclosure, the Commission needs to explain how these alternative windows of time should be accounted for in the disclosures under the following situations:

1. If the main date is cancelled with notice and the alternative date goes ahead;
2. If the main date is cancelled with notice and the alternative date is cancelled with notice;
3. If the main date is cancelled with notice and the alternative date is cancelled without notice;
4. If the main date is cancelled without notice and the alternative date goes ahead;
5. If the main date is cancelled without notice and the alternative date is cancelled with notice; and
6. If the main date is cancelled without notice and the alternative date is cancelled without notice.

For the above scenarios, Counties Energy recommends that the approach taken should align with the DPP3, where the alternate day can be triggered at any point prior to the intended interruption. This effectively moves the notification window of time and records the planned window and alternative window as one notification.



Physical
14 Glasgow Road
Pukekohe 2120
New Zealand

Postal
Private Bag 4
Pukekohe 2340
New Zealand

Energy
Reimagined

0800 100 202
countiesenergy.co.nz

Other points Counties Energy noted in the proposed schedules were:

1. Regarding, 10(vi) and 10(vii) is this meant to be 'Planned Interruptions' or 'Planned Outages' because the description does not match the column heading. The latter is not defined but could be assumed to include planned works that do not cause interruptions to customers. It is assumed that both should be 'Planned Interruptions'?
2. Regarding 10(vii) on page 224 of the draft determination, it defines 'planned interruption proceeding on time' as 'planned interruption proceeding on the date notified and completed within the notified interruption window'. This suggests that the start time could be any time on the same calendar day and the finish time can be anytime within the 'notified interruption window', which we assume is unintended. Counties Energy recommends that the tolerances on start/end times be clearly defined. We suggest a revised definition such as:

- a. *Planned interruption proceeding on the date (or alternate date) notified; and*
- b. *Starting not before the notified interruption window; and*
- c. *Starting not more than 30 minutes after the start time of the notified interruption window; and*
- d. *Completed not before two hours before the end of the notified interruption window; and*
- e. *Completed before the end of the notified interruption window.*

This proposed definition is designed to align to the approach taken in the DPP3 methodology.

Amendment Q13 – refine ID requirements on third party interference interruptions by breaking down into more specific categories, such as vehicle damage, “dig in”, overhead contact, and vandalism.

Counties Energy has recorded this information for several years and is supportive of this being included in the ID.

Regarding the below definition (pg224 of the draft determination):

Overhead contact means any form of unintended damage to any above ground network asset caused by contact that is not related to vegetation, animals, or ground vehicles

We suggest the inclusion of 'ground vehicles' in this definition is inconsistent with how we, and likely our peers too, record these events. At present, we define Overhead Contact to include events where a ground vehicle, such as a crane, high load, digger boom, makes contact with the overhead lines. This goes against the proposed definition where they would likely be interpreted as 'ground vehicles'. Although we note if the same vehicle types hit a pole, this would be 'vehicle damage'.

With the intervention strategies for line contact versus ground mount asset contact being different, we believe the new definition is less effective by muddling the two. Instead, Counties Energy recommends that:

1. In the definition of 'overhead contact' - 'ground vehicle' is removed; and
2. In the definition of 'Vehicle damage' - 'any network assets' is changed to 'any network assets including poles but excluding overhead lines'.

Counties Energy would be happy to discuss any aspect of this submission.



General Manager Commercial