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Sent: 27/11/2020 12:44:55 p.m.
To: Feedback Aurora Plan [feedbackauroraplan@comcom.govt.nz]
Subject: Feedback on Aurora investment plan

The following feedback has been received on the Aurora investment plan:

Introduction

Please provide your email address if you want to be kept up to date with our assessment:



Revenue smoothing

Please indicate whether you agree with our draft decision to apply Scenario 1 and describe what you see as the benefits to consumers of this scenario. If you instead prefer Scenario 2, please outline your reasons and describe what you see as the consumer benefits of deferring revenues, even if it means paying an interest cost later.:

As Central Otago consumers, we are not in favour of firstly the additional costs being levied on this region, nor the Scenario 1 outcome, again penalising Central Otago communities unfairly for inadequacies relating to Aurora/DCC mis-management of the past. A greater level of inter-generational repayment, plus more equality in cost apportionment across the Otago region is essential. There are many on fixed incomes (retirees) in Central who will be unfairly affected by current Aurora capital expenditure requests.

Monitoring Aurora's delivery

Would our proposals provide you with enough information to know whether Aurora is delivering its plan and improving its performance? If no, why not and what further or alternative information would you require to achieve this?:

We need to hold Aurora accountable for its actions rather than have excuse after excuse as poles fall over and infrastructure fails, then they plan repairs at totally inept times (mid-winter) forcing outages on communities during times of greatest need. Yes, customers need to know what is planned, when, how much and what the outcomes are.

Network outages

We are interested in your view of the impacts of setting outage targets at this level, and whether you consider it to be reasonable given the state of Aurora's network.:

Outages must be better planned, communicated and timed by Aurora, particularly for Central Otago consumers.

Capital spending

Do you think our approach to Aurora's growth projects is the right one, given the current uncertainty with electricity demand in Otago?:

Whilst the level of capital expenditure may be justified in Aurora's plans, it nevertheless stems from gross mis-management & inadequacies in the past and some level of compensation for that should be considered for rural districts outside Dunedin CC boundaries. New technology also needs to be factored into the solution - ie more widespread use of solar energy which will take some pressure off generation and transmission companies in time. So the How Much and How Soon equation for Aurora needs to be scrutinised very carefully. Much is also dependent on new National Policy Statements emanating from Central Govt and their interpretation by TLA's - CODC for instance has still not completed its District Plan review, started several years ago, which will influence urban development and population

growth in future, and therefore demand for services like 3 Waters, electricity, roading etc.

Operating spending

Do you think our assessment of Aurora's operating spending properly accounts for its capabilities and business costs?:

That is a reasonable assessment, but may require fine tuning and possibly an extension of time to provide more equitable inter-generational expenditure. After historically pouring excessive dividends into DCC projects and entities like DCHL, maybe it is time for Aurora to wear the interest on some substantial loans to tide them over, and go easy on the consumer / ratepayer for a change.

Further comments

Is there anything else you want to bring to the Commission's attention?:

All we want in Central Otago is a fair and equitable outcome that is not going to unduly penalise the consumer, many of whom are ratepayers and are already facing considerable costs for 3 Waters upgrades, earthquake strengthening of public buildings, insurance premiums and many other daily living costs.