



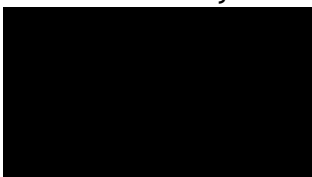
3 August 2022

Commerce Commission  
c/o im.review@comcom.govt.nz

**PROCESS AND ISSUES/DRAFT FRAMEWORK SUBMISSION - WELLINGTON INTERNATIONAL AIRPORT LIMITED**

1. This is Wellington International Airport Limited's (WIAL's) cross-submission in response to the Commerce Commission's Part 4 Input Methodologies Review 2023 Process and Issues Paper. This submission does not contain any confidential information.
2. WIAL is a member of the NZ Airports Association. We have contributed to and support NZ Airports' cross-submission in response to the Commission's Process and Issues Paper.
3. NZ Airports' submission, and the accompanying report from CEG, explains why the Commission should continue its consistent approach to estimating asset beta for the purposes of the IMs-compliant WACC estimate. When the Commission comes to evaluate airport price-setting events, it takes that IMs-compliant WACC as its starting point and then adjusts for any justified airport-specific departures from the IMs-compliant WACC estimate.
4. In our submission in response to the Process and Issues paper we set out a number of airport-specific matters that we believe are properly within scope of the Commission's evaluation of price-setting events. The HoustonKemp report that supported that analysis is enclosed with this submission.
5. The Commission's evaluation of price-setting events occurs after prices are notified and enter into force. As a result, the more certainty/guidance the Commission can provide up front regarding: (i) the types of departures from the IMs-compliant WACC that it will accept, and (ii) the evidence it requires to justify those departures, the better. We therefore invite the Commission, as part of the IMs Review, to provide additional guidance on these matters.
6. If you should have any queries in relation to this submission please do not hesitate to contact me at [martin@wlg.aero](mailto:martin@wlg.aero).

Yours sincerely



**Martin Harrington**  
Chief Financial Officer