



31 August 2022

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Powerco Limited (Powerco) welcomes the opportunity to provide a submission on the Commerce Commission's draft decision for the targeted information disclosure review for electricity distribution businesses (EDBs).

Powerco supports most of the Commission's proposed amendments. In fact, Powerco already includes nearly all the proposed asset management information in our asset management plan.

Our suggestions on the draft decision are:

- **The Commission should work with EDBs to explore and define meaningful and practical consumer connection metrics.** We support the intent behind quantitative metrics (Q3) on the time taken to set up new connections. It's an important part of the customer experience. However, because many factors influence the connection process, careful thought is needed to ensure the measures are meaningful and practical and can be reported consistently by EDBs.
- **Change the first disclosure timing to give EDBs time to organise their systems and processes to capture and report new quantitative information.** While we support the new quantitative requirements, the proposed timing of the first disclosure is impractical for some of the amendments because it requires EDBs to report data retrospectively. We also expect that capturing and reporting information on the time taken to set up new connections will potentially require material investment in our current systems (or new ones). Therefore, we suggest that EDBs may *voluntarily* disclose this information for the 2023 disclosure year and that all new quantitative requirements come into force from 1 April 2023 (DY24).
- **The Commission should clarify each amendment's audit and director certification requirements.**

Attachment 1 has a summary of our views on the proposed amendments. We look forward to engaging with the Commission over the coming months to support this review. If you have questions about this submission, please contact Nathan Hill [REDACTED].



Andrew Kerr
Head of Policy, Regulation, and Market

Attachment 1: Summary of Powerco's views on the proposed information disclosure amendments

KEY: ■ WE SUPPORT ■ CONDITIONAL SUPPORT ■ WE DO NOT SUPPORT

Quality of Service		
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
Q2	■	Add ID requirements on power quality
Q3	■	Add ID requirements on time taken to set up new connections.
Q4	■	Add ID requirements on customer service, eg, customer complaints
Q5	■	Add ID requirements on information about customer charters and guaranteed service level (customer compensation) schemes, eg, information about existing schemes
Q11	■	Refine ID requirements on interruptions by clarifying definitions to ensure successive interruptions are recorded consistently
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.
Decarbonisation		
D2	■	Add requirements on new network loads likely to have a significant impact on network operations or asset management priorities
D4	■	Add reporting requirements on EDBs' innovation practices

Asset management		
AM6	■	Amend the definition of 'overhead circuit requiring vegetation management'
AM7A/ AM7B	■	Improve lifecycle asset management planning provisions (vegetation, assumptions)
AM8A/ AM8B	■	Improve lifecycle asset management planning provisions (processes, forecast assumptions) and provide additional information on data and models
AM9	■	Add explanation and exploration of scenarios, in addition to providing a single point forecast in forecasting schedules
AM10	■	Disconnections data
AM13	■	Require EDBs to make a confidential disclosure of operational expenditure on cybersecurity
Aligning ID with other regulatory rules		
A1	■	Changes to recoverable and pass-through costs definition