

25 May 2018

Keston Ruxton  
Submissions  
Commerce Commission  
PO Box 2351  
**Wellington**  
Via email: [regulation.branch@comcom.govt.nz](mailto:regulation.branch@comcom.govt.nz)

Dear Commission,

**Re: Open letter – emerging technology**

Thank you for the opportunity to provide feedback on the scope and purpose of this piece of work.

Contact welcomes the open letter and acknowledges the importance to customers of the process the Commission has commenced.

As you know from your engagement with us to date, we have put significant time and effort into understanding the issues your letter raises. We have also developed significant market insights through the development of our demand flexibility residential pilots. Accordingly we would like to request a meeting with you where we can share our thoughts and insights on the matters raised in your letter, specifically:

- How emerging technology is defined; we think it is important that rather than focusing on the type of technology or assets, it is more useful to focus on what services these technologies are providing. This outputs-focused approach has the added benefit of making the definition more durable, in the face of longer term technology developments.
- Information disclosure requirements; we appreciate the Commission's pragmatic approach to using existing disclosure materials to efficiently answer the questions posed, and think a few key additional matters could add value to the process.

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- The impact of new technology on the market; there are substantial benefits available to customers if competitive markets are fostered.

We look forward to confirming a time with you for this discussion.

Yours sincerely

Louise Griffin  
**Head of Regulatory Affairs and Government Relations**

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