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**From:** comcom@squiz.co.nz [comcom@squiz.co.nz]  
**Sent:** 8/12/2020 9:52:52 a.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:

[REDACTED]

### **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.:

I am submitting by email.

### **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?:

Until the Central Otago /Queesntown Lakes lines network returns to a consumer trust-owned model, we will see no end to Aurora's poor performance, and the expensive oversight required by the ComCom as regulator.

### **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.:

How reliable are the outage figures provided by Aurora to the ComCom? I have had 11 outages in the past 12 months, with only 3 of these having been notified as planned.

### **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?:

I don't mind how much Aurora spend on rebuilding our network, as long as it is funded by DCC as owners of Aurora. DCC has misappropriated the revenue from Central Otago consumers' lines charges for 20 years. It is now up to DCC to find another source of funding other than using consumers again.

### **Operating spending**

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

I'm not qualified to know. But I do know that management salaries in Aurora have increased alarmingly over the last 10 years. And I know that they have paid big money to buy network contractor services from around NZ and Australia to quickly patch up their failing network. Done in a more timely manner, this would have been much cheaper to achieve by using the competitive tendering process to rebuild network sections.

### **Further comments**

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

I would like for the ComCom to state and promote the obvious solution to this network mess. Networks should,

where possible, be run as consumer-owned trusts. There is ample evidence throughout NZ of how well these models operate, and how the ComCom can largely leave these entities alone to serve the energy distribution needs of their customer-owners at the best possible price. We are long overdue to finally address the serious shortcomings of Max Bradford's electricity industry restructuring of 1997 that spawned all of this Lines Network mess. Regulation is hugely costly in terms of the reviews, research, submissions, regulations, appeals and court actions that have plagued this industry since.