



31 August 2022

## Targeted Information Disclosure Review — Electricity Distribution Businesses, Draft Decisions Paper — Tranche 1

### Introduction

Electra Limited (Electra) welcomes the opportunity to submit to the Commerce Commission:

- *Targeted Information Disclosure Review – Electricity Distribution Businesses, Draft Decisions Paper*, 3 August 2022 (the Draft Decisions Paper); and
- *[Draft] Electricity Distribution Information Disclosure (Targeted Review Tranche 1) Amendment Determination 2022* (the Draft Determination).

The focus of this submission is on three issues of particular importance to Electra:

- (i) the independence of ID regulation from other forms of regulation, in particular, price-quality regulation;
- (ii) access to network data at the low-voltage (LV) level; and
- (iii) pushing out the implementation timeframes of the proposed changes by at least one disclosure year.

Our views on all other matters are expressed in the industry feedback provided by the Electricity Networks Association (ENA).

Included in Appendix A are more detailed responses to the proposed ID changes. Nothing in this submission is confidential.

### Independence of ID Regulation

1. Electra owns and operates the electricity lines and assets in the Kapiti and Horowhenua districts. We are locally owned through the Electra Trust and have 45,900 beneficiaries that are the consumers connected to our network. We are an exempt electricity distribution business (EDB) under s54G (2) of the Commerce Act 1986 (the Act).

As submitted in our response to the Commission's Process and Issues Paper<sup>1</sup>—

2. 'Overall, we believe that the Commerce Commission's (the Commission) proposed changes to the Information Disclosure Regulation<sup>2</sup> (IDs) are well intended. We support providing information to our stakeholders on our decarbonisation journey and evidencing how we actively support New Zealand's decarbonised future.'

[And]

'...though well-intentioned several of the Commission's proposed changes are tantamount to quality regulation, which is not the intention of Part 4.'

The Commission pushed back on our concerns and, in the Draft Decisions Paper, stated—

'The s 53A [of the Commerce Act 1986] requirement that there must be 'sufficient' information to allow interested persons to make informed assessments against the Part 4 purpose should be separate from the question of whether suppliers are also subject to [price-quality] regulation.'<sup>3</sup>

We agree that sufficient information is important for our stakeholders to confirm that we are providing them with the level of service they expect at the price they are willing to pay. Our concern is that the information being collected by the Commission goes beyond what is sufficient or even useful for the consumers of an exempt EDB, and we question if the proposed changes erode the independence of ID regulation.

ID Regulation and Price-quality Regulation serve very different purposes. It would be easy for these regulations to inadvertently crossover as inherent efficiencies can be had in aligning reporting requirements and managing regulatory overlap. The risk of the Commission's focus on reporting efficiencies is that the lines between the different forms of regulation become blurred and even eroded to the extent that regulation operates outside its intended purpose.

3. We are of the view that these proposed changes represent that very real risk. As we move forward on these Tranche 1 and Tranche 2 changes, the Commission must be cognisant of that risk and not merely dismiss our concerns.

## Access to data

It is disappointing that the Commission has passed on the opportunity to address the data access issue. In the Draft Decisions Paper, the Commission stated—

'In response to the [Process and Issues Paper], several EDBs described significant and varying data access challenges that EDBs face. We have designed our proposed requirements to ensure that EDBs could comply with them despite data access challenges by designing high-level narrative requirements, including on information about data access. This gives EDBs the opportunity to quantify and contextualise the information that they disclose.'<sup>4</sup>

We have submitted the issue of data access in several submissions to the Commission and the Electricity Authority. Most recently, in a cross submission to the Commission's Part 4 Input Methodologies Review 2023, Process and Issues Paper, and Draft Framework, we submitted—

'Unfortunately, access to metering data remains unresolved, and we believe it to be an issue that, if unresolved, has the potential to impede the electricity industry in its

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<sup>1</sup> Commerce Commission, Targeted Information Disclosure Review — Electricity Distribution Businesses, Process and Issues Paper, 23 March 2022.

<sup>2</sup> Commerce Commission, Electricity Distribution Information Disclosure Determination 2012, consolidating the principal amendments as at 9 December 2021.

<sup>3</sup> Paragraph 3.12 of the Draft Decisions Paper.

<sup>4</sup> Paragraph 4.110 of the Draft Decisions Paper.

delivery of New Zealand's decarbonisation goals. Making access to metering data is an important issue for the Commission to consider as part of this IMs review...<sup>5</sup>

Smartco shared a similar view to ours in its submission to the Commission's Part 4 Input Methodologies Review 2023, Process and Issues Paper, and Draft Framework—

'With the anticipated increase in electricity consumption that a low carbon economy causes, EDBs should be preparing themselves with network designs and operating methodologies that can maintain network grid resilience, meet the demands of consumers and generators, and manage electricity demand and power quality on their networks. However, for this, EDBs need access to timely [and] relevant information.'<sup>6</sup>

[And]

'Without access to appropriate metering data, EDBs are unlikely to be in a position to develop effective non-network alternatives. Developing these alternatives is critical to developing New Zealand's decarbonisation and renewable energy goals and providing long-term benefit to consumers.'<sup>7</sup>

4. To date, neither the Commission nor the Electricity Authority has taken meaningful action to address the limitations we face around data access. Both push the issue back onto EDBs, which is both disappointing and frustrating. In its Draft Decisions, Paper the Commission stated—

'How EDBs plan and manage risk when it comes to data access challenges is very relevant to stakeholders in trying to answer these questions. For example, data access challenges may affect EDBs' efficiency in innovating or their ability to respond to changing consumer demands in the context of new technology.'<sup>8</sup>

We agree with the Commission that data access challenges are very relevant to stakeholders. We would have liked to have seen some acknowledgment of the difficulties facing EDBs in finding a workable solution to the ongoing data access problems. Instead, it appears that the Commission has passed the responsibility for justifying the need for data access and the problems back onto EDBs.

5. We will endeavour to continue to raise the issue and document the problems in the hope that the Commission and the Electricity Authority eventually take action to address these unresolved data access issues.

## Push implementation time frame out by a disclosure year

In our submission to the Process and Issues Paper, we recommended that the Commission consider giving EDBs' a full disclosure year from the determination date for the proposed changes before they take effect. For example, Tranche 1 changes, determined in 2022, would take effect for the 1 April 2024 disclosure year.

The Commission has not adopted our recommendation. Several proposed changes are to be implemented in the current disclosure year, i.e., reported in the—

- 2023-2033 AMP published by 31 March 2023 (or a standalone document by 30 June 2023); or
- ID Schedules 1-10 published by 31 August 2023.

Thereby implementing the proposed changes retrospectively.

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<sup>5</sup> Electra, Process and Issues Paper/Draft Framework: Cross Submission, 3 August 2022.

<sup>6</sup> SmartCo, Process and Issues/Draft Framework submission — SmartCo Limited, 27 June 2022

<sup>7</sup> Supra n6.

<sup>8</sup> Paragraph 4.112 of the Draft Decisions Paper.

6. The application of retrospective regulations is unreasonable and presents risk. We don't currently have the systems in place to capture the base data needed to report the information proposed by the Commission. Accordingly, our ability to effectively and appropriately complete the necessary system changes for year-end reporting during a disclosure year is limited.
7. Further, we are disadvantaged by the consultation timeline and the Final Determination. The August release of the Draft Decision was five months into the current disclosure year, and a November release of the final decision will be eight months into the current disclosure year. The Commission will take most of the current disclosure year to determine the new reporting requirements. Giving EDBs only four months to ensure they have the systems to collect the data, compile the information, and report to a standard required for director certification.
8. While we will do everything we reasonably can to comply with the new requirements, we believe that the information reported in 2023 may not be of a suitably high standard. There is therefore a risk this information will not meet the purpose of Part 4.
9. The Commission must reconsider the timelines for implementing the proposed changes under Tranche 1. EDBs need time to make the necessary system changes, and the Commission needs time to run workshops and answer EDBs' questions. Giving all parties the 2023 disclosure year to implement the changes will result in more useful information being released in August 2025, sufficient to enable informed assessment against the Part 4 purpose.

## Closing Comments

Should you have any questions, please contact Nick Carter, Network Planning and Development Manager, in the first instance at [REDACTED]

Sincerely

[REDACTED]

Neil Simmonds  
Chief Executive

## Appendix A—our comments on the Draft Decision and Determination

Amendment		Electra's Comments
Q3	Add ID requirements on time taken to set up new connections	<p><b>Summary of the proposed change</b></p> <p>For the 31 March 2023 disclosure year (i.e., the current disclosure year started on 1 April 2022), add the following to s9e(i):</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> average time taken to give a quote for a new ICP;</li> <li><input type="checkbox"/> average time taken to make a new ICP;</li> <li><input type="checkbox"/> average time taken to give a quote for alterations to be made to an existing ICP; and</li> <li><input type="checkbox"/> average time taken to make alterations to an existing ICP.</li> </ul> <p><b>Comments</b></p> <p>While reporting these performance measures seems simple enough at face value, practicalities are likely to make reporting harder than it appears. New Connection policies will vary significantly from EDB to EDB. For example, some EDBs self-manage the process of establishing a new connection in its entirety. While other EDBs allow approved contractors to manage the process of establishing a new connection, including the connection to their network and energisation. The practicalities of the various new connection policies mean that this requirement is unlikely to result in consistent reporting between EDBs.</p> <p style="padding-left: 40px;">10. The terms 'quote', 'average time', 'new ICP', 'alterations', and 'make' is subject to interpretation and will vary between EDBs. The Commission must guide EDBs on what each measure means or risk inconsistent interpretations of the terms.</p> <p>It is unclear how reporting the average time taken measures whether an EDB meets consumers' expected service levels. For example, EDB A having a 5-day average and EDB B having a 15-day average do not necessarily equate to EDB B having a lower level of consumer service than EDB A. Nor does the result indicate that consumers of EDB A are receiving the expected level of services and consumers of EDB B are not.</p> <p><b>Recommendations</b></p> <ul style="list-style-type: none"> <li>(i) In the Final Decisions Paper, clarify what the Commission means by 'quote', 'average time', 'new ICP', 'alterations', and 'make'.</li> <li>(ii) Push the implementation time for this requirement out to 1 April 2024 to give the Commission more time to consider the purpose of this measure, establish an appropriate measure, and for EDBs to complete the necessary system change to collect the necessary data to report against this measure.</li> </ul>

Amendment		Electra's Comments
Q11	Refine ID requirements on interruptions by clarifying definitions to ensure successive interruptions are recorded consistently.	<p><b>Summary of the proposed change</b></p> <p>For the 31 March 2023 disclosure year (i.e., the current disclosure year started on 1 April 2022), modify the definition of SAIFI values and SAIDI values to ensure EDBs record successive interruptions as an additional SAIFI value if restoration of supply occurs for longer than one minute, i.e., apply the 'multi-count' approach consistently across all EDBs.</p> <p>Transitional provision—EDBs that do not currently record their SAIFI and SAIDI using the 'multi-count approach can continue to record their SAIFI and SAIDI values on the same basis that they employed as at 31 March 2022 for the 2023 and 2024 disclosure years (i.e., 1 April 2022 and 1 April 2023).</p> <p><b>Comments</b></p> <p>We support this potential ID change as it will help consistent reporting between EDBs. And are appreciative of the transitional provisions as they represent a pragmatic approach to implementing this new performance measure.</p> <p>We note that the definition of 'reference period' has not changed. Meaning the normalisation of SAIDI and SAIFI continues to be based on performance between 1 April 2004 and 31 March 2009. A lot has changed in the outage management practices over 13 years. As part of this review, the Commission could consider updating the reference period to a more recent time series, such as 1 April 2015 to 31 March 2020.</p> <p><b>Recommendation</b></p> <p>Consider amending the reference period to incorporate more recent interruption data, for example, from 1 April 2015 to 31 March 2020.</p>
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.	<p><b>Summary of the proposed change</b></p> <p>For the 31 March 2023 disclosure year (i.e., the current disclosure year started on 1 April 2022), break down the reporting of interruptions caused by third-party interference in s10(ii) to include commonly occurring interruptions resulting from external contractors or members of the public. A new table of additional third-party reporting categories includes:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> 'Dig-in': means any unintended damage to any underground network asset caused by a third party</li> <li><input type="checkbox"/> Overhead Contact: means any form of unintended damage to any above-ground network caused by contact that is not related to vegetation, animals, or ground vehicles.</li> <li><input type="checkbox"/> Vandalism: means any unintended destruction of, or damage to, any network asset.</li> <li><input type="checkbox"/> Vehicle Damage: means any unintended damage to any network asset caused by a ground vehicle.</li> <li><input type="checkbox"/> Other.</li> </ul>

Amendment		Electra's Comments
		<p><b>Comments</b></p> <p>Third-party damage to our assets is investigated, and the cause is determined. To report against this measure for 31 March 2023, we will need to go back to all our investigations since 1 April 2022 and retrospectively assign a subclause per the proposed categories. While this is not impossible, it will be time-consuming and require a high level of subjectivity since this requirement did not exist when the investigation was conducted. The retrospective application of this requirement is likely to make the 2023 results less reliable than will be the case if this requirement is implemented from 1 April 2024.</p> <p>We note that vandalism means the unintended destruction of, or damage to, any network asset. Surely vandalism by its very nature is intentional damage. The Collins dictionary defines vandalism as—</p> <p>12. 'action involving deliberate destruction of or damage to public-private property.'</p> <p><b>Recommendation</b></p> <ul style="list-style-type: none"> <li>(i) Reconsider the definition of 'vandalism'; should this be 'intended damage' rather than 'unintended damage'?</li> <li>(ii) Push the implementation time for this requirement to 1 April 2024 to give EDBs an appropriate amount of time to complete the necessary system change and collect consistent data to report against this measure effectively.</li> </ul>
D2	<p>Add requirements on new network loads likely to have a significant impact on network operations or asset management priorities.</p>	<p><b>Summary of the proposed change</b></p> <p>For the 31 March 2023 AMP (i.e., AMP being prepared now), or a standalone document published by 30 June 2023, discloses a description of how the EDB:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Assesses the impact that new network loads will have on its network, including how Electra:             <ul style="list-style-type: none"> <li>o measures the scale and impact of new network loads;</li> <li>o takes the timing and uncertainty of new network loads into account; and</li> <li>o takes other factors into account, e.g., the network location of new loads; and</li> </ul> </li> <li><input type="checkbox"/> Assesses and manages the risk posed by uncertainty regarding new network loads.</li> </ul> <p><b>Comments</b></p> <p>In our submission to the Process and Issues Paper, we stated—</p> <p>'...we do not currently have the process to collect this information. Even if we create the processes, customers are unlikely to share such information with EDBs, particularly if there is a risk that the information will be publicly disclosed.'</p> <p>The Commission addressed our concerns with this requirement and confirmed its expectations by stating—</p>

Amendment		Electra's Comments
		<p>'This proposed requirement focuses on the EDB's capability and risk management regarding know[n] and potential new network loads that the EDB considers are likely to have a significant impact on its network operations or asset management priorities. This may vary between EDBs based on their characteristics.'<sup>9</sup></p> <p>Given this clarification, we are satisfied that our concerns around this measure have been resolved. However, we believe that the proposed implementation date of 31 March 2023 is unachievable.</p> <p>Planning for the AMP starts 18 months before publication; the AMP is substantively written by August each year and goes to our directors for comment in November. Asking EDBs to add information at this late hour of the process is unreasonable and unlikely to result in information that adds value being included in the 2023 AMPs.</p> <p>We recommend that the Commission push the implementation date to 31 March 2024 so that the information requirements can be added to the 2024 AMP plan and that the information can be delivered in a considered and proactive manner.</p> <p>There may be a typo in the description of 'Potential loads' at clause 17.4 (page 102) to Attachment A of the Draft Determination, i.e., 'an' should be 'on the' in the sentence—</p> <p>13. 'Potential loads' refers to facilities located on the EDB's network's footprint that could convert its energy supply from fossil fuels to electricity. This may vary between EDBs based on the different characteristics of their networks.</p> <p><b>Recommendation</b></p> <p>(i) Confirm the wording of 'Potential loads' in clause 17.4 to Attachment A, Asset Management Plans; <u><i>New network loads likely to have significant impact.</i></u></p> <p>(ii) Push the implementation time for this requirement to 31 March 2024 to give EDBs an appropriate amount of time to complete the necessary system change and collect consistent data to report against this measure effectively.</p>
AM6	Amend the definition of 'overhead circuit requiring vegetation management.'	<p><b>Summary of the proposed change</b></p> <p>For the 31 March 2024 disclosure year (i.e., from 1 April 2023), define 'overhead circuit requiring vegetation management' at s9(c) as—</p> <p>14. 'those circuits around which vegetation falls within the 'notice zone' as defined in the Electricity (Hazards from Trees) Regulations 2003.'</p> <p>If the meaning of the 'notice zone' distance definition changes, then the distance within which vegetation is deemed to be affecting overhead circuits would change to align with the new 'notice zone' definition.</p>

<sup>9</sup> Paragraph 33 of the Draft Decisions Paper.



Amendment		Electra's Comments
		<p><b>Comments</b></p> <p>We believe that the amendment does little to clarify the reporting requirements of this measure, and reporting inconsistencies are likely to continue for the foreseeable future.</p> <p>Including worked examples in the Final Decisions Paper and holding a series of workshops to land a common understanding could go a long way toward addressing the current inconsistencies between EDBs reporting against this measure.</p> <p>There appears to be a typo in the definition of Overhead circuit requiring vegetation management on page 224 of the Determination, in that the close bracket in the second instance of the regulations is in the wrong place—</p> <p>15. 'which meets the definition of 'conductor' in the Electricity (Hazards from Trees) Regulations 2003 and is installed as an overhead line in an area in which vegetation falls within the 'notice zone' as defined in the Electricity (Hazards from Trees) Regulations 2003'</p> <p><b>Recommendation</b></p> <ul style="list-style-type: none"> <li>(i) Include worked examples in the Final Decisions Paper that EDBs can use to guide their understanding of this new reporting requirement.</li> <li>(ii) Hold workshop(s) to clarify the understanding and work with the Commission to ensure consistency in reporting by EDBs.</li> </ul>
AM7A/AM7B	<p>Improve lifecycle asset management planning provisions (vegetation, assumptions).</p>	<p><b>Summary of the proposed change</b></p> <p>For the 31 March 2024 disclosure year (i.e., from 1 April 2023):</p> <p>AM7A—information on vegetation management-related maintenance; and summary discussion of the modelling approaches used, assumptions used to inform the model used, and economic justifications that underpin the model used</p> <p>16. AM7B—the modelling approach and rationale used to inform capital expenditure forecast for their assets.</p> <p><b>Comments</b></p> <p>In our submission to the Process and Issues Paper, we supported this new measure because these measures are an extension of current practices. The implementation date of 31 March 2024, i.e., the 2024/2034 AMP, gives us the time we need to plan the inclusion of this information in the 2024 disclosure year AMP.</p> <p>We encourage the Commission to align the implementation date of all AMP reporting to 31 March 2024 to give EDBs ample time to plan to include this new measure in their AMPs.</p> <p>There appears to be a typo in clause 2.5.2A(2) in that there is a closing bracket but no opening bracket at item 10(vii)—</p>

Amendment		Electra's Comments
		<p>'(2) Item 10(vi) (notice of planned interruptions) and item 10(vii) (notice of unplanned interruptions) as part of the Report on Network Reliability set out in Schedule 10.'</p> <p><b>Recommendation</b></p> <p>. Align the implementation date of all AMP reporting requirements to 31 March 2024, at the earliest, to give EDBs ample time to plan to include this new measure in their AMPs.</p>
AM10	Disconnections data	<p><b>Summary of the proposed change</b></p> <p>18. For the 31 March 2023 disclosure year (i.e., the current disclosure year started on 1 April 2022), disclose actual ICP and DG disconnections in s9e(1). And for the 31 March 2024 disclosure year (i.e., from 1 April 2023), disclose forecast ICP and DG disconnections in s12c(1).</p> <p><b>Comments</b></p> <p>The Commission has not defined 'disconnected' in the Draft Determination. EDBs will be able to collect ICP and DG disconnection information via the Registry. However, the Code applies the definition of 'electrically disconnect, which may not capture the information the Commission seeks. Under the Code—</p> <p>19. 'electrically disconnect' means to operate a device so that electricity is unable to flow, including through a point of connection, and electricity disconnect, electrically disconnecting, disconnection, and similar phrases have corresponding meanings.'</p> <p>For example, an ICP can be electrically disconnected multiple times a year due to a credit disconnection or the ICP changing consumers. For ID reporting, would an EDB report each time the ICP was disconnected? Or is the Commission thinking more around decommissioned ICPs and DG, which is a more permanent removal of the ICP and DG connection from the network than is the case for electrical disconnections? Under the Code—</p> <p>20. 'decommissioning means—</p> <ul style="list-style-type: none"> <li>(a) The permanent removal from service of—             <ul style="list-style-type: none"> <li>(i) an asset; or</li> <li>(ii) a point of connection; or</li> <li>(iii) a metering installation associated with a point of connection; or</li> </ul> </li> <li>(b) For the purposes of Parts 11 and 15, the permanent removal—             <ul style="list-style-type: none"> <li>(i) permanently removing an electrical installation associated with the point of connection; or</li> <li>(ii) changing the allocation of electrical loads between the point of connection with the effect of making a point of connection obsolete; or</li> </ul> </li> </ul>

Amendment		Electra's Comments
		<p>(iii) in the case of a distributor only ICP for an embedded network, the embedded network ceases to exist</p> <p>We believe that before this measure can be implemented, the Commission must clarify what it is they want to measure and the purpose of that measure. And clearly define what disconnected for ID regulation means. Pushing the implementation to 1 April 2024 would give the Commission time to clarify its intentions and EDBs time to make the necessary systems change to capture that data. We think it unlikely that the current statistics available through the Registry fit the Commission's purpose.</p> <p><b>Recommendation</b></p> <p>An implementation date of 1 April 2024 will give EDBs appropriate time to complete the necessary system change and collect consistent data to report against this measure effectively.</p>
AM13	Require EDBs to make a confidential disclosure of operational expenditure on cybersecurity.	<p><b>Summary of the proposed change</b></p> <p>21. For the 31 March 2023 disclosure year (i.e., the current disclosure year started on 1 April 2022), disclose to the Commission Electra's actual and forecast cybersecurity operational expenditure in Schedule 6b (ii (and Schedule 11b, respectively).</p> <p>The information regarding cyber security expenditure will be disclosed to the Commission only: it will not be included in information published for stakeholders.</p> <p>To protect the confidentiality of the information, EDBs will be required to disclose both public and confidential versions of Schedules 6 and 11.</p> <p>Define cybersecurity as—</p> <p>'The application of technologies, processes, and controls to protect systems, networks, programs, devices and data'</p> <p><b>Comments</b></p> <p>We support this initiative of the ENA. However, we urge the Commission to push the implementation date to 1 April 2024 (i.e., the 31 March 2025 disclosure year) to give EDBs adequate time to capture this information consistently and robustly.</p> <p><b>Recommendation</b></p> <p>An implementation date of 1 April 2024 will give EDBs appropriate time to complete the necessary system change and collect consistent data to report against this measure effectively.</p>

Amendment		Electra's Comments
A1	Changes to recoverable and pass-through costs definition.	<p><b>Summary of the proposed change</b></p> <p>For the 31 March 2023 disclosure year (i.e., the current disclosure year started on 1 April 2022), update the following definitions:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> 'pass-through costs' shall have the meaning specified in clause 3.1.2(1) of the electricity distribution input methodologies (EDB IMs);</li> <li><input type="checkbox"/> 'recoverable cost' shall have the meaning specified in clause 3.1.3(1) of the EDB IMs.</li> </ul> <p><b>Comments</b></p> <p>In the Process and Issues Paper, we supported this potential ID change as the alignment of definitions is helpful. We are disappointed that although the Commission supports the prioritisation of "tidy-up" changes, it does not intend to do any until Tranche 2.<sup>10</sup></p> <p>We are perplexed as to why the Commission would want to wait until Tranche 2 to correct errors, add guidance, and remove redundant existing requirements where appropriate. The useability and functionality of the ID requirements are vital to their applicability and effectiveness.</p> <p>On that basis, we strongly encourage the Commission to take this opportunity to "tidy up" the ID Determination at Tranche 1 and then again at Tranche 2.</p> <p><b>Recommendation</b></p> <p>Make all small changes and 'tidy-ups' to the ID Determination in conjunction with the Tranche 1 proposed changes.</p>

<sup>10</sup> Paragraphs X11.4, X16, 1.17.3, 1.24, 4.225, 4.232, and 5.11 of the Draft Decisions Paper.