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By email: infrastructure.regulation@comcom.govt.nz

Targeted Information Disclosure Review (2024) – Electricity Distribution Businesses (Draft decision paper)

This submission provides Network Tasman’s input on the Commerce Commission’s draft decisions for the Targeted Information Disclosure Review (2024) for Electricity Distribution Businesses (EDBs). We appreciate the opportunity to contribute to this important discussion.

Network Tasman supports the overarching objectives of the Commerce Commission in its endeavour to enhance transparency and disclosure in the performance assessment of EDBs. We recognise the vital role that Information Disclosures (IDs) play in providing stakeholders with valuable insights into the performance of EDBs.

This submission is limited to comments on proposed amendment AM6. This submission expands on the comments on this amendment made by ENA in its submission. For all other proposed amendments, Network Tasman endorses the ENA’s submission.

Amendment AM6

Amendment AM6 proposes to introduce obligations on EDBs to disclose new information relating to vegetation management.

Vegetation is a significant cause of outages and it is important interested parties are able to determine whether EDBs are effectively managing the risks posed by vegetation but the current proposal is unworkable for Network Tasman.

Specifically, Network Tasman does not currently maintain records of the information proposed for disclosure, and implementing this would require material resources, both financial and time-related.

Network Tasman has a proactive approach to vegetation management. We conduct comprehensive inspections of all overhead lines on a two-year survey cycle. This 24-month cycle has been identified as being appropriate given the typical growth rates of species in the Nelson environment.

Our dedicated vegetation surveyors patrol the network to identify and inform tree owners of their responsibilities under existing regulations. Our vegetation surveyors also proactively engage with tree owners where their trees are identified as a risk, but do not fall under the umbrella of the tree regulations, generally with success. This approach allows us to address risks that cannot be managed via the formal regulatory framework.

In terms of potential solutions, should the Commission seek to introduce additional vegetation disclosures, Network Tasman suggests the Commission consider the vegetation

management reporting requirements implemented by Aurora Energy as part of its CPP Annual Delivery Report.

Alternatively, if the Commission aims to introduce more detailed disclosures, we recommend engaging in further discussions with EDBs to identify data that can be readily accessed and shared without imposing significant resource burdens or material operational changes and /or investments for EDBs.

Network Tasman submits that the Commission needs to be conscious of the risks of introducing obligations that run counter to the purposes of ID regulation, which is to publish information about how EDBs operate their business, rather than to explicitly change how those EDBs operate their businesses.

Network Tasman appreciates the Commerce Commission's commitment to transparency and accountability in the EDB sector. We remain committed to working collaboratively to find practical solutions that serve the best interests of all stakeholders. Thank you for considering our feedback on Amendment AM6, and we look forward to continued engagement on this matter.