



9 May 2018

Keston Ruxton  
Regulation Branch  
Commerce Commission  
Wellington  
By email: [regulation.branch@comcom.govt.nz](mailto:regulation.branch@comcom.govt.nz)

Dear Keston

## Capex IM review: Integrated Transmission Plan update

In the penultimate year of our current regulatory control period (RCP) 2015 - 2020, the current Capex IM requires

- an updated Integrated Transmission Plan (ITP) by the last working day of September (2018) and
- a full ITP by the first working day of December (2018).<sup>1</sup>

In our response to the technical review of the revised Capex IM determination we submitted that, for 2018:

*“...the ITP update comes about 2 months before the new ITP under the base capex proposal for an RCP. We consider the update followed by new ITP could be confusing for consumers and distracts Commission and Transpower resource from the proposal process. We consider the exclusion under sub clause (2) could also apply to the penultimate disclosure year with no consequence to the informational value of the ITP”.<sup>2</sup>*

We strongly support the Commission’s proposal to remove the requirement for an updated Integrated Transmission Plan (ITP) in the September of the penultimate disclosure year. We appreciate the Commission’s prompt attention to the issue.

Yours sincerely

Rebecca Osborne  
**Regulatory Affairs and Pricing Manager**

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<sup>1</sup> Capex IM clause 3.1.1 and clause 2.1.1.

<sup>2</sup> [Transpower submission Capex IM technical review – marked up determination 24 April 2018](#)