



31 October 2024

Ben Woodham  
Electricity Distribution Manager  
Commerce Commission  
WELLINGTON

Email: [Infrastructure.regulation@comcom.govt.nz](mailto:Infrastructure.regulation@comcom.govt.nz)

Dear Ben,

**Proposed amendments to input methodologies for electricity distribution businesses – wash-up amounts**

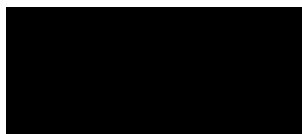
Orion welcomes the proposed changes for the calculation of wash-up balances and the limit on wash-up drawdown amounts.

As we outlined in our submission on the draft DPP4 decision<sup>1</sup>, Orion was concerned about the lack of clarity around the calculation of the wash-up draw down amounts. We are pleased to see that the Commerce Commission has further considered this and is now making changes to correct the issue.

Orion supports the proposed amendments outlined in the Commission's "[Draft] EDB IM (Wash-up Amount) Amendment Determination 2024". We also welcome the publication of the demonstration model, which provides further clarity for Electricity Distribution Businesses around the requirements.

We do not consider any part of this submission to be confidential. Please do not hesitate to contact me on [REDACTED] if you wish to discuss our submission.

Yours sincerely



Kelly Chapman

**Regulatory Lead**

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<sup>1</sup> Orion submission on the draft Default Price- Quality Path decision (2024)  
<https://www.oriongroup.co.nz/assets/Our-story/Submissions/Commerce-Commission/Orion-submission-draft-DPP4-decision-July-2024.pdf>

