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Commerce Commission

Submission: *Targeted Information Disclosure Review – Electricity Distribution Businesses* draft decisions paper – Tranche 1

Federated Farmers of New Zealand appreciates the opportunity to provide feedback on the Commerce Commission's *Targeted Information Disclosure Review – Electricity Distribution Businesses* draft decisions paper – Tranche 1.

Our interest in the draft decisions paper centres around the experience of our farmer members on the quality of their network-connected electricity supply. For many rural consumers, electricity outages are frequent and lengthy. This may be a product of their networked electricity supply being more vulnerable to weather events than for consumers in more densely populated areas (where undergrounding is more prevalent). It may also be a consequence of less-than-ideal maintenance in parts of any company's lines network for being deemed uneconomic on a customers per km or other basis.

Current reporting requirements mean it is difficult to discern the extent to which a company's maintenance programme is sufficient to ensure reliable electricity supply to rural consumers. Performance measures tend to aggregate performance measures and statistics (such as SAIDI and SAIFI) in a manner that gives the impression a company is generally providing a pretty good level of service to all its consumers. In aggregating such statistics in that way, the experience of rural consumers of more frequent / longer lasting outages generally goes under-recognised.

We do accept that there are technical or technological challenges to companies providing this level of disaggregated data on quality-of-service performance. In the meantime, the additional information proposed in the draft decisions paper should assist in providing greater clarity of company actions and intentions on aspects that will impact the experience of rural consumers.

As such, we support implementation of proposed amendments Q1, Q2, Q4, Q5, Q11, Q13 and D2. We have no objection to the Commission implementing proposed amendments Q3, D4, AM7A/AM7B, AM8A/AM8B, AM9, AM10, AM13 or A1. Further, we are comfortable with the timelines proposed for implementation of these amendments.

Yours sincerely,

Mark Hooper
Energy & Electricity spokesperson