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★ wellington electricity™

Submission on EDB IM wash-up amendments

1 November 2024

1 Submission and contact details

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| Consultation | Consultation on electricity distribution businesses input methodologies (Wash-up Amounts) |
| Submitted to | Commerce Commission |
| Submission address | Ben Woodham, Electricity Distribution Manager infrastructure.regulation@comcom.govt.nz |
| Date submitted | 1 November 2024 |
| Submitter | Peter Anderson, Commercial and Regulatory Analyst, Wellington Electricity Lines Limited (WELL) |
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2 Confidential information

There is no confidential information provided in this submission. This submission can be publicly disclosed.

3 Introduction

Wellington Electricity Lines Limited (**WELL**) welcomes the opportunity to make a submission to the Commerce Commission on its consultation paper on the *proposed amendments to input methodologies for electricity distribution businesses – wash-up amounts*.

4 WELL supports the proposed amendments

As noted in the Commerce Commission's draft decision reasons paper¹, "the transitional arrangements for the revenue washup provided in the EDB IMs do not function as intended". This results in an inability to draw down the RY24 wash-up account balance in the first year of DPP4.

WELL supports the Commerce Commission's [Draft] Electricity Distribution Services Input Methodologies (Wash-up Amounts) Amendment Determination 2024². We agree that:

- the proposed amendments will give effect to the intent of the IMs by correcting this technical error; and
- the amendments to clauses (5)(a)(ii) and (12) provide greater clarity around how to calculate and implement the time value of money adjustments to wash-up calculations.

¹ Commerce Commission, https://comcom.govt.nz/_data/assets/pdf_file/0025/362734/Draft-reasons-paper-Proposed-amendments-to-EDB-IMs-Wash-up-Amounts.pdf

² Commerce Commission, https://comcom.govt.nz/_data/assets/pdf_file/0024/362733/5BDraft5D-EDB-IM-Wash-up-Amounts-Amendment-Determination-2024.pdf