



5 October 2023  
Commerce Commission  
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## **Alpine Energy Limited's cross-submission on the Commerce Commission's Targeted Information Disclosure Review (2024)**

### **Overview**

1. This is Alpine Energy Limited's (**Alpine Energy**) cross-submission, providing feedback on submissions on the Commerce Commission's (**Commission**) Targeted Information Disclosure Review (2024) (**TIDR 2024**) Draft Decision - Reasons paper, dated 17 August 2023.
2. In our review of the submissions to the Commission's TIDR 2024 we have identified several themes which are outlined below.

### **Amendment AM6 - Vegetation management reporting**

3. We support the Electricity Networks Aotearoa (**ENA**) view, along with other Electricity Distribution Businesses (**EDB**), that the proposed disaggregation of vegetation management opex is impractical. This type of opex reporting would be difficult to audit, leading to significantly increased audit costs.
4. We support the proposal that has been put forward by Aurora Energy (**Aurora**), Network Tasman and other EDBs - if the Commission wishes to introduce additional vegetation disclosures, the Commission should consider using the vegetation management reporting requirements implemented by Aurora in its CPP Annual Delivery Report.
5. We foresee an inconsistent application, as did Horizon Network and Network Waitaki, by EDBs in the interpretation of 'in-zone', 'out-of-zone', 'wind-borne debris', 'related to inclement weather', and 'other', Class C interruptions from vegetation. It places an unnecessary burden on field staff in determining whether an interruption was due, for example, from a tree branch that was 'out-of-zone', 'wind-borne' or a result of 'inclement weather'. It could result in a time-consuming exercise for field staff, considering their priority is to restore electricity supply when an outage occurs.
6. We agree with Network Waitaki that the disaggregated categories should be limited to 'in-zone' and 'out-of-zone', as these distinctions are clearer and more practical.
7. Our original submission aligns with that of Orion and several other EDBs - that the Commission postpone new vegetation-related reporting requirement to TIDR

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## **ALPINE ENERGY LIMITED**

2025 considering the Ministry of Business, Innovation and Employment's (MBIE) review of the Electricity (Hazards from Trees) Regulations 2003 (**Tree Regulations**). Changes to the Tree Regulations could significantly alter reporting regulations going forward.

#### **Amendment Q14 - expand ID requirements to include raw interruption data**

8. We share the view of Aurora, Counties Energy, Electra, ENA and Firstgas Group that there is little value to publicly disclosing raw interrupted data in the proposed format. The amount of data generated would be too cumbersome and impractical for interested parties to use.
9. We support Electra's recommendation that the Commission reevaluate its proposed Schedule 10a and instead require EDBs to provide raw interruption data to the Commission in Excel Workbook only.

#### **Amendment D5 - Work and investment on flexibility resources (non-traditional solutions)**

10. We are supportive of the idea of replacing 'non-network solutions' with a more relatable term. However, as Aurora, Electra, ENA, Firstgas Group and Network Waitaki point out, the term 'non-traditional solutions' is too broad and may not effectively identify innovative solutions that are commonly used. The ENA and Firstgas Group cite an example, where the use of diesel generators, a technology with a long history of use, could be classified as a 'non-traditional solution'.
11. We are happy to work with the Commission to develop a more appropriate definition.

#### **Cybersecurity (Commission only)**

12. We support the recommendation put forward by Aurora and Electra. The reporting of Cybersecurity should be streamlined by creating a separate ID schedule. As per Aurora's comments, this schedule could include information relating to actual operating and capital expenditure, a comparison of forecast to actuals, and an option for voluntary explanatory notes. This could be added to the Schedules 5f and 5g Workbook as Schedule 5h. It allows for this information to be reported to the Commission directly without being disclosed on the EDBs' website.

#### **Conclusion**

13. If the Commission has any questions or requires clarification on any information provided in our cross-submission, please do not hesitate to contact us.

Ngā mihi nui,



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Marisca MacKenzie  
Chief Regulatory Officer



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Oscar Horstmann  
Regulatory & Corporate Advisor