

18 August 2016

Lyn Taylor
Regulatory Accountant
Powerco Limited
Private Bag 2061
New Plymouth, 4342

By email

Dear Lyn

Exemption for Powerco Limited 2016 GDB Schedule 10 Information Disclosure

1. In your letter dated 2 August 2016 you seek an extension of Powerco Limited's (Powerco's) exemption from the requirements of clause 2.5.2(1)(f) of the Gas Distribution Information Disclosure Determination 2012 (ID Determination) to disclose the number of telephone calls to emergency numbers answered within 30 seconds and the total number of calls by region or sub-network.
2. You propose that Powerco should continue to provide this information in the overall network schedule and not disaggregate this performance metric by region or sub-network as required by the ID Determination.
3. This letter provides the Commission's response to the above request.

Background to your request

4. Clause 2.5.2(1)(f) of the ID Determination requires Powerco to disclose the percentage of telephone calls answered within 30 seconds by region within the sub-networks (reported in Schedule 10b).
5. You state that Powerco Limited has not captured the data to enable the above information to be reported by sub-networks.
6. You also state that Powerco is unable to disaggregate call answer times on a sub-network basis with the current phone infrastructure and that system changes required to allocate calls by sub-network would incur high costs and may not result in a clear network split despite best efforts.
7. The Commission previously granted Powerco an exemption from the above requirements for the 2014 and 2015 disclosure years on the basis that Powerco's

proposed method of aggregated reporting was consistent with the purpose of the ID Determination in that it reflected how quickly Powerco answered emergency calls to the one call centre it operated.

Further exemption granted

8. The Commission considers that it is appropriate to grant Powerco a further exemption for the same reasons as set out above.
9. Under clause 2.11.1 (1) of the ID Determination, the Commission exempts Powerco from the requirement to disclose the information required under clause 2.5.2(1)(f) of the ID Determination on a regional basis. This is an on-going exemption and will apply for the 2016 and future disclosure years.
10. The exemption is subject to Powerco:
 - 10.1 disclosing the information on an aggregated basis of the number of calls to the emergency number answered within 30 seconds/total number of calls; and
 - 10.2 noting that it has been granted this exemption with the publication of the disclosures referred to in paragraph 10.1.

Further information

11. This exemption may be revoked or amended in accordance with clause 2.11.1 (2) of the ID Determination.
12. We acknowledge that this is an on-going issue for Powerco and will consider the matter when we propose future amendments on the disclosure requirements relating to GDB service quality.¹
13. For any further questions please contact Alison Young on 04 924 3823 or Alison.Young@comcom.govt.nz.

Yours sincerely



Sue Begg
Deputy Chair

¹ The requirements that will be considered in the next round of amendments have not yet been determined.