

18 February 2021

Aurora CPP
Commerce Commission
Level 9
44 The Terrace
Wellington 6011

To Whom it may Concern,

Submission: Technical consultation on two changes to Aurora's CPP determination

Thank you for this opportunity to submit on your proposed technical changes to the draft determination.

Technical change #1: Adjusting the CPP for the effects of transfers

It is outwardly apparent that significant value can be added to the assets of Aurora Energy from their sale to competent, prudent and trusted owners. It is therefore highly likely that transfers or splits will occur in the short to medium term.

It is vitally important that reporting and disclosure around 'sub-networks' be improved prior to this likely occurrence.

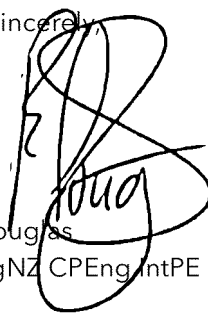
The distribution networks fed from Frankton, Cromwell and Clyde GXPs are clearly¹:

- Non-contiguous.
- Geographically separate.
- Not interconnectable at distribution level.

It is therefore considered that separate disclosures should be required for each of these sub-networks.

Please ensure that your technical changes to IM are complemented by improved information disclosure (ID) from Aurora. A separate deed, varying the ID may be required.

Yours sincerely,


Rob Douglas
CMEngNZ CPEng IntPE

¹ https://web.archive.org/web/20210206114017/https://comcom.govt.nz/_data/assets/pdf_file/0025/78703/Electricity-distribution-information-disclosure-determination-2012-consolidated-3-April-2018.pdf