

Electricity Networks Association

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Dane Gunnell
Senior Analyst
Regulation Branch
Commerce Commission
P O Box 2351
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Dear Dane

Input Methodologies for EDBs – Cash flow Timing for CPPs

We refer to the Consultation Papers “Consultation on Electricity and Gas Input Methodologies: Cash flow timing for customised price-quality paths” dated 10 August 2012 and the “Supplement to the consultation on Electricity and Gas Input Methodologies: Cash flow timing for customised price-quality paths” dated 31 August 2012.

The ENA is currently considering its response to these papers and requests an extension to the submission deadline by one week, to 21 September.

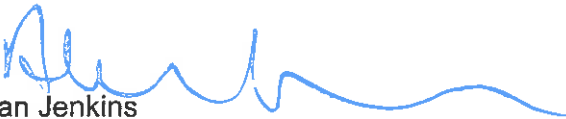
We note that the original deadline for submissions published in the 10 August Paper was 7 September 2012. At the time this deadline was set it was proposed that the supplementary information would be available for consultation by 17 August. Subsequently, the supplementary information was published two weeks later than planned, on 31 August, and at that time the submission deadline was extended by one week to 14 September.

In the interim, on 21 August the “Revised Draft Reset of the 2010-15 Default Price-Quality Paths” Consultation Paper was released, and submissions invited on this Paper by 1 October. The ENA is currently considering its response to the DPP Reset Paper. Yesterday, ENA members attended a Commission briefing on the revised DPP reset models, which addressed the cash flow timing approach proposed. The DPP reset method proposed is relevant to the cash flow timing proposals for the CPP IM, ie: we need to consider the consistency or otherwise of the proposals.

Given the material which has been released since the first Consultation Paper and the delay in the supplementary material, we request an additional week to that which has been provided, for the CPP IM cash flow timing submission. This is necessary in order for us to communicate with our members, seek their feedback, and draft our response to you. It is not possible for us to achieve this by 14 September.

We would appreciate your timely consideration of this request.

Yours sincerely



Alan Jenkins
Chief Executive
Electricity Networks Association