

Default price-quality paths for electricity distribution businesses from 1 April 2025

Proposed Process

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Associated Documents

Publication Date	Reference	Title
30 November 2022	ISBN 978-1-99-101249-4	Electricity Distribution Services Default Price-Quality Path (Powerco transition) Amendments Determination 2022
29 April 2021	4072846-6	Open letter – ensuring our energy and airports regulation is fit for purpose
20 May 2020	ISBN 978-1-869458-15-7	Electricity Distribution Services Input Methodologies Determination 2012 – consolidated principal determination and all amendments as of 20 May 2020
20 May 2020	ISBN 978-1-869458-16-4	Electricity Distribution Services Default Price-Quality Path Determination 2020 – consolidated principal determination and amendment determination as of 20 May 2020
27 November 2019	ISBN 978-1-869457-68-6	Default price-quality paths for electricity distributors from 1 April 2020 – Final decision reasons paper

Chapter 1 Introduction

Purpose

1. This paper outlines the process we propose following to set the next default price-quality path (**DPP**) for electricity distribution businesses (**EDBs**).¹
2. The main objectives of this paper are:
 - 2.1 to allow price-quality regulated EDBs and other interested parties to plan for future engagement on the DPP-setting process and
 - 2.2 to seek views on the proposed process from all interested parties to help refine our process.
3. To achieve this, this paper discusses:
 - 3.1 the context relating to the DPP reset for the regulatory period commencing 1 April 2025 (**DPP4**)
 - 3.2 the proposed scope of DPP4
 - 3.3 our proposed process for resetting the DPP, including specific proposed elements that we would like your feedback on and
 - 3.4 how you can provide your feedback on the matters discussed in this paper.
4. We invite submissions in response to this paper by **5pm, Friday 23 June 2023**.

Introduction

5. Electricity is essential to the everyday lives of New Zealanders, powering everything from heating, cooking, lighting, transport, and communications. Therefore, the infrastructure that supports getting electricity to where it needs to be (e.g., poles, wires, cables and other supporting technologies) is vitally important.
6. Under Part 4 of the Commerce Act 1986 (**Part 4**), EDBs supplying electricity from the national grid to homes and businesses across Aotearoa New Zealand are regulated as natural monopolies.

¹ More information about price-quality regulation and the DPP can be found on our website at: <http://comcom.govt.nz/regulated-industries/electricity/electricity-default-price-quality-path/> and in the 2020 DPP3 workshop presentation https://comcom.govt.nz/_data/assets/pdf_file/0021/104826/Knowledge-sharing-session-on-default-price-quality-paths-5-November-2018.PDF

7. Part 4 is intended to serve the long-term benefit of consumers by promoting outcomes consistent with those in workably competitive markets, such as incentives to innovate, invest, improve efficiency, provide services that meet consumers demands, and limit excessive profits.²
8. This regulation is overseen by us, the *Commerce Commission / Te Komihana Tauhokohoko*. We regulate EDBs in two main ways:
 - 8.1 **Information disclosure regulation**, which applies to all EDBs, and requires the public disclosure of information on an EDBs performance and network plans. We also analyse the information and publicly report on EDB performance to help influence behaviour.
 - 8.2 **Price-quality regulation**, which applies to a subset of EDBs (currently 16 of 29) and establishes minimum standards of quality of service these EDBs must meet and limits the revenues they can recover from consumers for those services. Whether an EDB is price-quality regulated or not is determined by a consumer-ownership exemption criterion set out in the Commerce Act.³
9. For those EDBs subject to price-quality regulation, we last set a DPP in November 2019 to apply from 1 April 2020, and it is due to expire on 31 March 2025. We are now required to decide on the next DPP by 30 November 2024 for it to take effect from 1 April 2025.

² s52A of the Act: <https://www.legislation.govt.nz/act/public/1986/0005/latest/DLM1685404.html>

³ s54D of the Act <https://www.legislation.govt.nz/act/public/1986/0005/latest/DLM1685686.html>

Chapter 2 Context for DPP4

10. The Commission is conscious of the changing landscape for EDBs and consumers as we commence this DPP reset. Each EDB reset has novel and significant issues to consider, and this reset is important as Aotearoa New Zealand’s response to climate and technological change starts to take shape and accelerate.
11. In preparation for this reset we have considered the views of stakeholders in response to several engagements, including our:
 - 11.1 April 2021 open letter - ensuring our energy and airports regulation is fit for purpose⁴
 - 11.2 December 2021 workshop on the impact of decarbonisation on electricity lines services⁵
 - 11.3 Targeted review of the information disclosure (ID) requirements for EDBs (ongoing)⁶
 - 11.4 Part 4 Input Methodologies (IM) review Process and Issues paper⁷
 - 11.5 November 2022 workshop: Forecasting and incentivising efficient expenditure for EDBs⁸ and
 - 11.6 November 2022 Reopeners workshop: Price-quality path in-period adjustment mechanisms.⁹
12. EDBs have signalled they are facing pressures around changes and uncertainty driven by:

⁴ https://comcom.govt.nz/_data/assets/pdf_file/0022/253561/Open-letter-Ensuring-our-energy-and-airports-regulation-is-fit-for-purpose-29-April-2021.pdf

⁵ https://comcom.govt.nz/_data/assets/pdf_file/0028/275824/Summary-and-feedback-on-workshop-on-the-impact-of-decarbonisation-on-electricity-lines-services-7-December-2021.pdf

⁶ TIDR tranche 1 decisions; tranche 2 commenced with a workshop 27 March 2023.

⁷ https://comcom.govt.nz/_data/assets/pdf_file/0031/283864/Part-4-Input-Methodologies-Review-2023-Process-and-Issues-paper-20-May-2022.pdf

⁸ <https://comcom.govt.nz/regulated-industries/electricity-lines/electricity-lines-price-quality-paths/electricity-lines-default-price-quality-path/2025-reset-of-the-electricity-default-price-quality-path?target=documents>

⁹ https://comcom.govt.nz/_data/assets/pdf_file/0034/299266/Reopener-workshop-Discussion-slides-29-November-2022.pdf

- 12.1 **Decarbonisation / increased electrification.** Government policy on climate change has evolved, with a legislated target and supporting policies now in place for 10% less than 2017 emissions by 2030, and transition to net-zero emissions by 2050¹⁰. Over the coming years we expect an increase in electrification, more intermittent renewable generation, less thermal generation, and a more distributed energy system. The Government is preparing a Gas Transition Plan and an Energy Strategy, which are due to be published at the end of 2023 and 2024 respectively.
- 12.2 **Resilience of energy infrastructure,** including relating to risk of extreme weather events being experienced in New Zealand; and of growth in cyber-crime being faced by organisations within NZ and around the world.
- 12.3 **Advances in technology and changes in consumer preferences,** such as distributed energy resources which are giving consumers more options to act on preferences for sustainability by generating and storing electricity themselves and selling any excess back into the grid.
- 12.4 **Increasing cost pressures, where inflation** remains around a 30-year high¹¹ and the economy is still recovering from the impacts of COVID-19.

Specific feedback following Expenditure Forecasting Workshop

13. Our November 2022 workshop with stakeholders focussed specifically on the challenges of “forecasting and incentivising efficient expenditure” in the move towards increasing electrification. This workshop was intended to support our preparations for DPP4.
14. We followed up with a series of targeted questions to help us understand how EDBs’ Asset Management Plans (**AMPs**) may contribute to setting DPP4; as well as feedback regarding DPP4 in general, Information Disclosure (**ID**), and our programme of performance analysis. Some of the main challenges and insights raised by EDBs related to:
- 14.1 uncertainty in forecasting growth in demand – specifically around:
- 14.1.1 accommodating industrial process heat conversions
 - 14.1.2 electric vehicles
 - 14.1.3 integrating third-party distributed energy resources

¹⁰ Section 5Q of the Climate Change Response (Zero Carbon) Amendment Act

¹¹ <https://www.stats.govt.nz/news/annual-inflation-6-7-percent/>

- 14.1.4 a lack of visibility around capacity of the low voltage network
 - 14.1.5 timing of infill housing and large developments
 - 14.1.6 final government energy policies and legislative change around decarbonisation. The New Zealand Emissions Reduction Plan was released in May 2022, providing limited opportunity to model network investment requirements
 - 14.1.7 effectiveness of flexibility services to avoid or delay investment
 - 14.2 accommodating uncertainty in expenditure forecasting in the DPP, and how the Commission can be assured of the quality of forecasting
 - 14.3 how to optimise timing of capital investment – getting ahead of demand vs certainty of need
 - 14.4 financeability – ensuring regulation does not prevent them from being able to raise and repay debt and raise equity in financial markets readily and on reasonable terms
 - 14.5 differing levels of confidence in forecasting both opex and capex - EDBs generally have the highest level of confidence in capex forecasts for asset renewal and replacement compared to other capex categories
 - 14.6 resource / supply chain constraints and inflation concerns.
15. We thank submitters for their contribution¹² which have informed both our on-going work on the IM review and Targeted Information Disclosure Review (**TIDR**), and our planned approach to DPP4.¹³

Some additional factors for consideration

16. We note there are some additional factors relevant to the DPP4 reset which we consider it is helpful for stakeholders to be aware of:
- 16.1 Higher inflation and interest rates as a result of changes in macroeconomic conditions, as well as growth in the EDBs' regulatory asset bases over DPP3, mean that it is likely that DPP4 revenue will be materially higher than EDB revenue in DPP3.

¹² Please note that as this is a process paper, we have not fully addressed these submissions. We plan to summarise and respond to workshop submissions our planned DPP4 Issues Paper.

¹³ Stakeholder submissions can be found on the Commission website. at <https://comcom.govt.nz/regulated-industries/electricity-lines/electricity-lines-price-quality-paths/electricity-lines-default-price-quality-path/2025-reset-of-the-electricity-default-price-quality-path?target=documents&root=314431>

- 16.2 In addition, recently disclosed EDB asset management plans for 2023 show that some EDBs are planning significant increases in expenditure on their networks. These mark a step change on 2022 AMP forecasts and in some cases (e.g., Orion and Wellington Electricity) they are more than increases considered previously in customised price-quality paths (CPPs). Some EDBs have also signalled they expect 2024 AMP forecasts to be higher, particularly as resilience expenditure is reconsidered in light of recent extreme weather events.
- 16.3 Our regime relies on forecasting and incentivising efficient expenditure, to ensure that consumers get value for money and that they are paying for the least-cost whole-of-life solutions to electrify the economy. We expect that while we will likely need to adapt our approach to forecasting expenditure from DPP3, the potential perverse incentives associated with relying on supplier expenditure forecasts will remain. The availability of a CPP is an important feature of the regime. This enables greater scrutiny of an EDB's specific expenditure needs. We will consider how to provide appropriate scrutiny to the EDBs' expenditure plans within the default/customised framework and what tools are appropriate.

Chapter 3 Default / customer price-quality regulation and proposed scope of DPP4

Price-quality regulation for EDBs

17. Sixteen EDBs are currently subject to price-quality path regulation under Part 4. We set limits on maximum revenue,¹⁴ and minimum standards for service quality for these EDBs. These price-quality paths remain in force for a period of time known as the regulatory period. The next regulatory period will commence on 1 April 2025.

Relatively low-cost default price-quality path with the option of a customised alternative

18. The specific type of price-quality regulation that applies to the 16 EDBs is known as default/customised price-quality regulation. Under this type of regulation, we set a default price-quality path, and individual distributors may choose to apply for a customised price-quality path where they consider the default path does not meet their specific circumstances. Currently, Aurora Energy is the only EDB on a customised price-quality path, which will end in 2026.
19. The purpose of default/customised price-quality regulation is provided in s 53K of the Act:

The purpose of default/customised price-quality regulation is to provide a relatively low-cost way of setting price-quality paths for suppliers of regulated goods or services, while allowing the opportunity for individual regulated suppliers to have alternative price-quality paths that better meet their particular circumstances.

20. As provided above, default price-quality paths are required to be set in a relatively low-cost way. They are not intended to meet all circumstances that an EDB may face.
21. EDBs raised concerns in submissions following the Expenditure Forecasting workshop with the use of historical information for forecasting, given the significant uplift in expenditure anticipated to be required to accommodate decarbonisation of the economy. In previous resets we have used a combination of historical information and projections to reset DPPs, and we intend to consider the appropriate approach as part of the reset.

¹⁴ While the term used in section 53M of the Act is “prices”, the Act defines ‘prices’ as including revenues, and allows us to set a revenue cap. In DPP4, distributors will be subject to a revenue cap, so we will generally refer to “revenues” in this document for the sake of clarity.

22. If a default path does not suit the specific circumstances of an EDB, it can apply for and propose its own customised price-quality path. Customised paths use more business-specific information and rely on more in-depth verification and evaluation processes.
23. At least four months before the end of the DPP regulatory period we are required to reset the DPP that applies to EDBs. The current DPP period ends on 31 March 2025, so we must publish our final DPP4 determination on or before 30 November 2024.

Proposed scope of DPP4

24. The key decisions that will need to be made within the DPP reset include:
 - 24.1 starting prices
 - 24.2 standard rate of change based on productivity improvements
 - 24.3 alternative rates of change to minimise price shocks to consumers or undue financial hardship to EDBs
 - 24.4 appropriate quality standards
 - 24.5 appropriate incentives to improve performance and efficiency during the regulatory period (e.g., innovation, quality incentives)
 - 24.6 the rules by which EDBs demonstrate, and the Commission assesses, compliance with the DPP (compliance requirements)
 - 24.7 any changes required because of the 2023 Input Methodologies (**IMs**) Review
 - 24.8 the financial model used to determine starting prices, including the forecasts of operating and capital expenditure that the financial model is based on and
 - 24.9 any associated changes to IM determinations necessary to implement the DPP.
25. We are planning on a similar suite of financial models for our 2025 reset as was used in 2020. Based on feedback on our 2020-2025 DPP (**DPP3**) process, we anticipate providing preliminary versions of these financial models relatively early in the process.

26. We are conscious that suppliers have made submissions relevant to the DPP in the 2023 IM Review, particularly with regards to greater use of supplier forecasts, greater use of reopeners, and changes to CPP requirements. We intend to take account of those submissions (to the extent they are relevant) in the issues paper we will be releasing for consultation later in 2023. If suppliers consider we have not appropriately had regard to their submissions when preparing that issues paper, they will have a further opportunity to raise those issues both in response to that issues paper and also in response to our DPP4 draft determination.
27. We will be releasing the 2023 IM Review draft decision in June 2023, with the final decision to be released in December 2023. Our process for DPP4 will need to accommodate any changes arising from the IM review, as they relate to price-quality paths.
28. We also intend to approach this reset with an eye to the future and may consider which elements might be addressed or improved over which regulatory period.

Chapter 4 Proposed process

29. Table 1 below sets out the high-level proposed process and dates for DPP4¹⁵. In planning these, we have considered the requirements of the Act, the timing of relevant information disclosures by EDBs, feedback on previous DPP processes, and in response to feedback on our “Forecasting and incentivising efficient expenditure for EDBs” workshop.
30. The dates are indicative, and we will provide more definite dates closer to the time of the publication or event. We may also include additional process steps as we progress our analysis and receive further information from stakeholders. Where this is the case, we will issue an updated process. In finalising dates, we will be mindful of consultation processes of other relevant sector agencies where possible, particularly the Electricity Authority and its ‘Updating Regulatory Settings’ workstream.
31. We have also included some milestones relating to 2023 IM Review and TIDR, which are outside of DPP4 but may be relevant for your information. Please note that this is not a complete list of engagements the Commission intends to undertake with EDBs.

Table 1. Indicative dates for DPP4 process

Indicative date	DPP4 publication/event	Related publication / event
25 May 2023	DPP4 Process paper published: <ul style="list-style-type: none"> - Four-week submission period (submissions due 23 June 2023) 	
June 2023		2023 Input Methodologies Review - Draft Determination
July 2023	Knowledge Sharing Session	TIDR Tranche 2 - Draft Determination Review of 2023 AMPs commences
August 2023	Information Disclosure data for the year ending 31 March 2023 due	
Sept – December 2023	Information gathering request (s 53ZD notice) issued (including quality of service and 2024 expenditure forecasts)	
October 2023	Issues Paper published: <ul style="list-style-type: none"> - Four-week submission period - Two-week cross-submission period 	
December 2023		2023 IM Review - Final Determination
October 2023 – March 2024	Specific issues-based stakeholder workshops as required	

¹⁵ This information is shown as a timeline in the Appendix.

February 2024		TIDR Tranche 2 - Final Determination
May 2024	Draft Determination, including preliminary financial models: <ul style="list-style-type: none"> - Six-week submission period - Four-week cross-submission period 	
July – September 2024	Topic-based workshops as required	
August 2024	Information Disclosure data for the year ending 31 March 2024 due.	
By 30 November 2024	DPP4 Final Determination published	

Specific process considerations for feedback

32. The following are planned or potential elements of the DPP process, or relevant processes to the DPP. We are interested in your feedback on these.

Review of the 2023 asset management plans

33. Under our ID requirements EDBs must publicly disclose AMPs, which provide a forward-looking view of how EDBs intend to invest in, maintain and operate their networks for consumers, and includes forecasts of future expenditure over a 10-year horizon.¹⁶
34. The Commission regularly reviews AMPs to monitor the compliance and performance of the EDBs and to ensure that the AMPs are fulfilling the purpose of information disclosure (essentially that sufficient information is available for interested persons to assess whether the purpose of Part 4 is being met).
35. AMPs are an important consideration in the process of setting DPP allowances, where already-disclosed information plays a role in achieving the relatively low-cost of the default price-quality path. As mentioned above, some EDBs have recently disclosed AMPs with large step changes in forecast expenditure. If we are to rely on these forecasts, particularly where there are material step-changes in forecast expenditure and historical expenditure provides less guidance on what is appropriate, having confidence in the AMPs is critical.
36. With this in mind we consider it prudent to seek external expert support in undertaking our review of the AMPs and give particular consideration to the basis of forecasts that may be used as an to set the DPP.

¹⁶ Electricity Distribution Information Disclosure Determination 2012 Part 2, clause 2.6

37. The process of reviewing AMPs will begin in mid-2023 and will include engagement with EDBs to support any desktop analysis. We anticipate that this engagement may be helpful to the DPP process.

Disclosure of 2024 expenditure forecasting

38. Based on the timing of when AMPs are disclosed and the proposed timing of the DPP draft and final decisions, we anticipate using information from the 2023 AMPs for the draft decision with any updated information in the 2024 AMP used for the final decision. This is the same approach we took to the DPP3 reset.
39. Some EDBs have indicated that their 2024 AMPs may have considerably increased expenditure compared to their 2023 AMPs. Where the increases are substantial, it may be difficult to take into account such large changes in the time available between draft and final decision. In particular, it is unlikely we will have sufficient time to develop and consult on a completely new approach to forecasting from the draft.
40. To better understand this risk, we intend to seek specific information from each EDB about the expected level of change between 2023 to 2024 expenditure forecasts. Under s 53ZD of the Act we have the power to require EDBs to provide us with documents and information relating to their operations. We could require early disclosure of specific financial and / or policy-related information components of the 2024 AMP. This may enable this financial information to be included within the draft determination in May 2024. Our current thinking, consistent with previous resets, is that we are likely to make a request for early 2024 expenditure forecasting in late-2023 which may be followed with further information requests for related supporting information. The precise timing and scope of the request(s) will be subject to early analysis to identify needs.
41. To facilitate accurate information being provided under the s53ZD notices, we would expect those EDBs who are anticipating making material changes to specific components of their 2024 AMP to be seeking to complete this process on an advanced timeframe. We are interested in practicalities of advancing the completion of the AMP process for those components with material change, or the full AMP, including the possibility of providing unverified information early to enable to us to analyse the information and have regard to it, followed by verified information.
42. We are interested in your views on the above, what (if any) information you would be able to provide early to assist in this process, and when it would be able to be provided. Early AMP 2024 information disclosure may also potentially allow more time for stakeholder engagement.

Stakeholder workshops

43. In addition to seeking formal submissions at each major step of the consultation process, we are also proposing to hold stakeholder workshops. In previous consultations, Commission staff and stakeholders have found such sessions useful to discuss issues in person, to share ideas, and to aid in the preparation of high-quality submissions. These workshops may include:
- 43.1 a DPP knowledge-sharing session early in the reset process for stakeholders less familiar with the DPP-setting process and the Part 4 regime (similar to one held for DPP3) – July 2023
 - 43.2 specific issues-based / topic workshops, in the period between the Issues paper and Draft Determination - October 2023–April 2024
 - 43.3 other topic-focused workshops, if we consider these are required, during the finalising of the DPP4 decision – June-October 2024.
44. We are interested in your views on whether these proposed opportunities are useful to interested parties, and on the suitability of the timing. If you have specific topic workshops that you would like us to consider, please indicate what these are with a brief rationale.

Engagement with consumers and Māori

45. The purpose of our work is to promote the long-term benefit of consumers, and in doing so it is important we understand their views. We can do this by helping consumers understand our role and the long-term impact of the decisions we make on them, and by providing them with opportunities to have their say and explaining how we have considered their feedback.
46. Our approach to engaging with consumers is continuing to evolve as we build our understanding of their needs and how that best translates into their engagement with our work. We have not yet finalised our consumer engagement approach for DPP4 and may build consumer-specific steps into the process or adapt existing steps to have a consumer focus.
47. The Commission is committed to supporting Te Ao Māori as well as future-focussed Māori-Crown relationships through taking a good faith, collaborative approach to engaging with Māori on our work; and is starting to build relationships with Māori for the long-term and internal capability to support this. We acknowledge we are at the start of considering Māori engagement for price-quality resets.
48. For DPP4, we intend to work with Māori to understand their views and how they would like to be involved.

DPP regulatory period

49. We are interested in your views about whether we should consider the length of the DPP regulatory period early in the DPP4 reset. Currently the regulatory period is five years. However, the Commission may set a shorter period (a minimum of 4 years) if it considers that it would better meet the purposes of Part 4.
50. One reason for considering a shorter regulatory period would be if it could help to manage forecasting uncertainty discussed in Chapter 2. Forecasts generally become more uncertain over time and a shorter regulatory period would allow an earlier reset of the DPP. Because a change of this nature would have a significant consequential impact on both EDB and Commission processes we are interested in your early views on this.

Other changes outside of DPP4

51. There is the potential that DPP4 solutions may require changes to be made outside of the DPP i.e., to the IMs and / or Information Disclosure requirements.
52. In establishing the proposed DPP4 process, we have been mindful of the timeframe for the IM Review. Submissions on this paper will form part of the IM Review record and, where relevant, can be taken into account in coming to our final decisions on the IM Review.
53. Submissions on the DPP4 Issues Paper to be published towards the end of this year will not be part of the IM Review record or taken into account in coming to our final decisions on the IM Review. This reflects that:
 - 53.1 stakeholders will have opportunities to submit and cross-submit in the consultation on our IM Review draft decisions commencing before the end of this quarter and
 - 53.2 the short timeframe between our consultation on that DPP4 Issues paper and when we must make our final decisions on the IM Review means it is not practical or feasible to take submissions on that Issues paper into account in coming to our final decisions on the IM Review.
54. Depending on the type and extent of any changes proposed as part of the IM review, we may need to revise proposed DPP4 process steps. In particular, there may be additional information gathering requests.

55. In previous DPP resets, in order to implement policy decisions related to the reset we have amended the IMs as they relate to DPPs. This process may be required as part of this DPP reset process. However, we do not generally consider it to be appropriate to consider significant changes to fundamental IMs¹⁷ outside of the statutory IM review, except where we consider there are compelling and urgent reasons for doing so.

¹⁷ Fundamental IMs are generally those that define the foundational building blocks used to set PQ paths (listed in s 52T(1)(a)), and that are central to defining the balance of risk and benefits between suppliers and consumers.

Chapter 5 How you can provide your views

56. You are invited to provide your written views on this process paper no later than 5pm Friday, 23 June 2023. You should address your responses to:

Ben Woodham (Manager, Electricity Distribution)
c/o infrastructure.regulation@comcom.govt.nz

57. Please include “EDB DPP 2025 Process Paper” in the subject line. We prefer responses to be provided in a file format suitable for word processing in addition to PDF file format.
58. We intend to publish an updated process to advise stakeholders on any changes we have made to the content and scope of consultation steps in response to feedback in submissions, and the timing of those publications and events.

Requests for confidentiality

59. Please note that we intend to publish all submissions on this process paper.
60. The protection of confidential information is something the Commission takes seriously. The process requires you to provide (if necessary) both a confidential and non-confidential/public version of your submission and to clearly identify the confidential and non-confidential/public versions.
61. When including commercially sensitive or confidential information in your submission, we offer the following guidance:
- 61.1 Please provide a clearly labelled confidential version and a separate public version. We intend to publish all public versions on our website.
- 61.2 The responsibility for ensuring that confidential information is not included in a public version of a submission or cross-submission rests entirely with the party making it.
62. Please note that all submissions we receive, including any parts that we do not publish, can be requested under the Official Information Act 1982. This means we would be required to release material that we do not publish unless good reason existed under the Official Information Act 1982 to withhold it. We would normally consult with the party that provided the information before any disclosure is made.

Appendix

High-level dates for DPP4 process and other related processes

