



10 February 2023

Andy Burgess
Commerce Commission
44 The Terrace
Wellington 6140
By email: im.review@comcom.govt.nz

Dear Andy,

Input Methodologies (IM) review – Submission of Frontier Economics’ report on the Options to maintain investment incentives in the context of declining demand

Who we are:

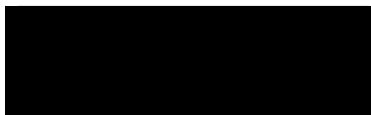
We are a collaborative group of three price-quality regulated gas distribution businesses (GDBs) in New Zealand - FirstGas, PowerCo, and Vector. We formed in 2021 in light of the recent gas default price-quality path reset.

Expert report submission:

The group is submitting Frontier’s report ‘Options to maintain investment incentives in the context of declining demand’ dated 9 February 2023 in response to the Commerce Commission’s consultation issued on 20th December 2022.

We would welcome further discussion with you on any aspects of the report.

Your sincerely,



Richard Sharp - on behalf of the Group