

Electricity Networks Association

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30 April 2014

Mark Berry
Chair
Commerce Commission
PO Box 2351
WELLINGTON

Dear Mark,

APPLICATION FOR AN EXTENSION OF TIME – COST OF CAPITAL PERCENTILE CONSULTATION

On 31 March 2014, the Commerce Commission issued a notice of intention to do further work on the cost of capital input methodologies, requesting the receipt of submissions by 1 May 2014. We would like to request a time extension of two working days (5pm Monday, 5th May) from the Commission for ENA, and on behalf of all other electricity distribution businesses (EDBs).

Although best endeavours have been made to finalise the expert reports, a number of their reports have not yet been able to be completed. Given the critical nature of the issue, it is vital that the Commission receive the best possible reports in the time permitted, noting our earlier expressed concerns that one month is insufficient to carry out a complete or comprehensive analysis.

In addition, the development of submissions has been running in parallel with responses to the Commission's process and issues paper on issues identified ahead of the Commission's draft decision to reset the Default Price-quality Path for EDBs. With limited resources this has put additional pressure on the preparation of the reports. Accordingly, ENA would appreciate this extension of two working days from the Commission.

Should you require further information or have the need to consult with ENA further on this extension request, please contact Nathan Strong on (06) 873 9406.

Yours sincerely



Ken Sutherland
Chair, Electricity Networks Association