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08 May 2012

Electricity Authority
Level 7, ASB Bank Tower
2 Hunter Street
WELLINGTON

By Email

Dear Sir/Madam

SUBMISSION – Consultation Paper- Voluntary consultation guidelines for proposed changes to distributors' tariff structures

Thank you for the opportunity to provide a submission on the latest consultation relating to the Voluntary consultation guidelines for proposed changes to distributors' tariff structures.

We believe that significant benefits to all participants are achievable through an open and honest consultation process.

Please find attached at the end of this covering letter our comments on the specific questions asked within the consultation paper.

If you have any questions regarding this submission, please get in touch with Anna Doerr, TrustPower's Process Operations Manager, on 07 574 4754.

Yours sincerely

A handwritten signature in black ink that reads "Doerr".

Anna Doerr
PROCESS OPERATIONS MANAGER
Private Bag 12023
Tauranga

Appendix A Format for submissions

Question	Response
<p>1. Do you agree with the proposed consultation principles and good practices? If not, what changes do you suggest, and why?</p>	<p>Yes.</p> <p>The most important principle that needs to be followed is the principle of an open mind “no pre-determination of any particular outcome” and the preparedness of a Distributor to change its position once it has received constructive feedback from Retailers.</p>
<p>2. Do you agree with the proposed scope for the consultation process by distributors? If not, what changes do you suggest, and why?</p>	<p>Yes</p>
<p>3. Do you agree that the Authority has taken appropriate factors into account in developing the consultation guidelines?</p>	<p>Yes</p> <p>We support the steps as set out in 3.4.1(MUOSA) and these steps along with those in 3.5.1(Retailers Forum Guidelines) should form the factors to be taken into account when developing the guideline.</p> <p>In particular 3.4.1(b) regarding sharing of information excluding “Confidential Information” is important in providing a wider understanding of the impacts of any of the proposed changes.</p>
<p>4. Are there any other factors the Authority should also take into account? If so, please provide details.</p>	<p>Yes</p> <p>It is important that Distributors should complete a cost benefit analysis, of the new technology that may be required to be installed, when introducing requirements for more metering information from specific groups of customers. Such as reducing the threshold for interval data to a lower connected capacity. This recently occurred in one network area which has a new threshold for TOU data set at 200 amps. This is a cost to Retailers which will flow onto Customers.</p>