



29 May 2015

Retail Advisory Group
C/- The Electricity Authority
PO Box 10041
WELLINGTON 6143
By email only: submissions@ea.govt.nz

SUBMISSION - RETAIL ADVISORY GROUP REVIEW OF SECONDARY NETWORKS

Aurora Energy welcomes this opportunity to respond to the Retail Advisory Group's (RAG) consultation paper "Review of secondary networks: issues and option paper", dated 21 April 2015.

Aurora is an electricity distribution business, serving electricity consumers in the Dunedin, Central Otago and Queenstown Lakes districts. Aurora also owns and operates one secondary network, being a 180-lot embedded subdivision at Te Anau (Heritage Estate).

Aurora's commercial and operational arrangements for the Heritage Estate embedded network are consistent with the arrangements for Aurora's grid-connected networks. Any retailer that is a party to a use-of-system agreement with Aurora may trade on the Heritage Estate embedded network, and the operational protocols, including communication of planned and unplanned service interruptions, are in accordance with the requirements of the use-of-system agreements.

Aurora is supportive of the RAG proposals to standardise arrangements, including development of a model embedded network use-of-system agreement, and amendments to the Guidelines for Secondary Networks. We also consider that removing barriers to secondary network type conversion is helpful.

Aurora would not be supportive, however, of any outcome that would require it to unwind its existing, industry standard, arrangements in favour of, for example, re-negotiating arrangements with retailers on the basis of a model embedded network use-of-system agreement.

If the RAG / Authority has any queries regarding Aurora's submission, please do not hesitate to contact the undersigned.

Yours Sincerely

A handwritten signature in blue ink, appearing to read "Alec Findlater".

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