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**Submission to the
Commerce Commission on its Process
Paper on Further Work for the Reset
Default Price-quality Path for Electricity
Distribution Businesses**

From

Wellington Electricity Lines Limited

19 March 2010

1. Introduction

1. Wellington Electricity Lines Limited (“WELL”) welcomes the opportunity to make a submission on the Commerce Commission’s (“CC”) Process Paper on Further Work for the Reset Default Price-quality Path for Electricity Distribution Businesses (“EDBs”).
2. WELL is appreciative to be given the opportunity to review the CC’s timetable. We realise that the CC has to meet a tight timeframe, but we are also hopeful that the CC will be mindful of the limitations faced by WELL and other EDBs in terms of staff availability and other resources needed to respond to the CC’s consultations.
3. WELL understands that the Electricity Networks Association (“ENA”) in its submission has highlighted some instances of potential conflict in the CC’s consultation timetable. WELL agrees with the ENA’s points and supports the ENA’s submission.
4. For its part WELL would like make a few additional comments about the CC’s timetable:
 1. The General Issues Discussion Paper is scheduled for June / July and also due around this time is the CC’s Draft Input Methodology Determination. This is during the winter period which is the most active and event filled time on the networks of most EDBs including WELL. We anticipate this could impact particularly heavily on the availability of technical and operational staff for comments on the CC’s consultations. Also since WELL has a December financial year end, the June – August period is the most active time for its Commercial, Regulatory and Finance team. We therefore respectfully request reasonable notification to allow sufficient review and return of comments during this period.
 2. WELL notes that the Starting Price Adjustment Amended Determination is scheduled to be finalised and gazetted in Q3 2011. WELL is required to consult with electricity retailers when there are significant changes to line charges. Further, any new tariff structures and other requirements will need to be incorporated into our regulatory and commercial models in order for final prices to be calculated and notified to retailers by the end of January 2012. If the CC’s schedule for Starting Price Adjustments runs late into Q3 2011 or over into Q4 2011 then we foresee difficulties in meeting our contractual price consultation and notification obligations.