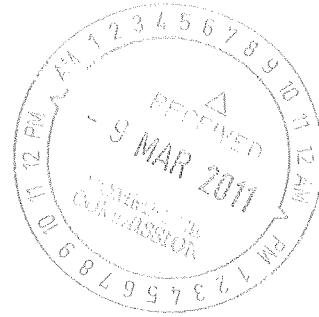




meridian

8 March 2011

John Groot
Regulation Branch
Commerce Commission
PO Box 2351
Wellington



Dear John

Submission – Information Disclosure Regulation, Electricity Lines Services and Gas Pipeline Services: Process and Issues Paper

Thank you for the opportunity to submit on the proposed process and issues for the Information Disclosure Regulation.

Meridian's interest relates to the regulation where it pertains to Transpower and we note our earlier submissions and cross submissions on Transpower's Individual Price-Quality Path (IPP) determined last year and our recent submission on the input methodology for Transpower's capital expenditure proposals (Capex IM).

Meridian is generally comfortable with the proposed process relating to Transpower in particular given the timing in relation to where the Capex IM is at in its determination process and the need to dove-tail this process with that determination. However we would note that an optimal outcome for the future would be to have sufficient information disclosed by Transpower by December each year end, to enable us to reflect it in our business planning processes which take place in the first quarter for the new calendar year.

We note for consideration during the discussion phase of consultation Meridian's key concerns around information disclosure by Transpower, being:

- Ensuring there is sufficient transparency around treatment of DC and AC assets and costs;
- Ensuring that assumptions concerning pass through and recoverable costs are stated;
- Provision of information on the proposed incentive scheme; and
- Sufficient detail to understand changes between opex and capex costs on an ongoing basis.

We look forward to further involvement at the discussion consultation stage, and if in the interim you would like to discuss any aspect of this submission further please don't hesitate to contact us.

Yours sincerely

Raewyn Moss
Regulatory & Government Relations Manager