

File: 4/3

6th March 2008

Network Performance Branch
Commerce Commission
P O Box 2351
WELLINGTON 6140

Dear Sirs,

Submission for Information Disclosure

Thank you for the opportunity to comment on the draft Information Disclosure Requirements. The following submission is made on behalf of Northpower Ltd.

All submission points raised relate to improving definitions on the supporting Excel workbook sheet 'MP1 Technical Information'.

- There is need for clarification on the 'Circuit length by Nominal Line Voltage'. Should this apply to currently 'in service' lines only?
- There needs to be clarification on the definition of street light circuit length. Should this include all street light circuits or just those that are not associated with LV reticulation (i.e. separate to LV circuits)?
- The Electricity Demand is requested in kilowatts (kW) in some places and kVA in others (Demand Density). Is there a need for consistency throughout the document?
- There is a need to clarify the 'zone substations demand'. Is this the maximum instantaneous or half-hourly demand for all zone substations at the time of maximum system demand, or a sum of the individual non-coincidental maximum demands?
- There is a need for definition of 'HV customer'. We prefer this be defined as metered at HV. It would seem of limited interest to capture demand for customers who have a 'connection point' that is from the HV network but metered at LV or even in many cases those that have an ELB transformer embedded in the installation.
- There are apparent inconsistencies in the application of "HV customer". In some cases it excludes "subtransmission customers" and in other cases it appears to include them.
- The 'LV customer demands and losses' definition needs to be reconciled against the definition of HV customer and account for instances where the customer provides their own transformer.
- There needs to be definition of 'Electricity supplied to Distribution Customers'. Does this only apply to LV customers i.e. does this exclude HV customers?

I trust the above will assist with the robust interpretation of the finalised requirements.

Yours sincerely

R I Dempster
Divisional Manager – Network Asset Management

LC:GP