

From: David Waters
DDI: (03) 577 5274
Email: davidwaters@linesmarl.co.nz

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Gareth Wilson
Acting Manager Network Performance
Commerce Commission
PO Box 2351
WELLINGTON

Dear Sir

Regulation of Electricity Lines Business, Development of Information Disclosure Regime Process Paper

On 17 October 2003 the Commission issued a process paper relating to the development of an information disclosure regime for electricity lines businesses. The paper requested that interested parties comment in writing on the process and timetable outlined in the paper.

Marlborough Lines is party to, and fully supports, the submission prepared by PricewaterhouseCoopers on behalf of 19 electricity lines businesses.

The paper indicates that the Commission intends to administer the Information Disclosure regime for the 2003/2004 disclosure year and thereafter, and that the regulations will be revoked at this time. At the recent Electricity Networks Association AGM, commission staff used a phrase along the lines of “*hope to have the Regulations revoked...*”.

It would be patently absurd for line companies to be required to provide two sets of (potentially marginally different) Information Disclosures, one to the Ministry of Economic Development under the Information Disclosure Regulations, and a further set to the Commission under the provision of Part 4A of the Commerce Act.

We therefore urge the Commission to ensure that either the current Regulations are indeed revoked by 31 March 2004, or the Commissions regime commences for disclosure in the 2004/2005 year.

We also urge the Commission to avoid any seemingly insignificant “tinkering” with the present requirements. Any minor modifications to the present requirements face the potential to unintentionally create additional work and/or confusion. As a small Company, with limited resources, we may have difficulty implementing any such “minor” changes within the specified time frame.

We thank the Commission for the opportunity to comment on the paper

Yours faithfully

A handwritten signature in black ink, appearing to read 'D. Waters', written in a cursive style.

David Waters
for Marlborough Lines