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**Submission to the Commerce Commission
on the Initial Reset of the DPP for
Electricity Distribution Businesses
Draft Determination**

Submitted by

Wellington Electricity Lines Limited

3 November 2009

1. Introduction

- 1.1 Wellington Electricity Lines Limited (“Wellington Electricity”) welcomes the opportunity to provide feedback to the Commerce Commission (“CC”) on its Draft Determination on the Initial Reset of the DPP for Electricity Distribution Businesses (“the Draft Determination”).
- 1.2 Wellington Electricity welcomes the early publication of the Draft Determination and is appreciative of the CC’s engagement at this very important stage of the DPP.
- 1.3 We are cognisant that the Draft Determination does not incorporate feedback from the most recent 8 September 2009 Draft Decisions Paper on the DPP.¹ We confirm that the positions we took in our earlier submission on the Draft Decisions Paper remain unchanged – please refer to that submission for further detail.²
- 1.4 Wellington Electricity supports and strongly urges the CC to give particular regard to the Electricity Networks Association’s submission on the Draft Determination.
- 1.5 We note that the Draft Decisions Paper indicated that an Updated Decisions Paper is due in mid-November reflecting submissions and cross-submissions to the Draft Decisions Paper. Accompanying the Updated Decisions Paper will be a Draft Initial Reset Determination setting out the CC’s proposed content for the determination giving effect to the Reset DPP. We understand that this Determination will be subject to a one week technical drafting consultation period.³ Due to the fact that the Draft Determination does not include feedback from the Draft Decisions Paper we suggest that the CC extends the proposed consultation period or seeks further comment prior to the publication of the Final Initial Reset Determination. This will enable

¹ *Initial Reset of the Default Price-Quality Path for Electricity Distribution Businesses Draft Decisions Paper*, 8 September 2009, Commerce Commission.

² *Submission to the Commerce Commission on the Initial Reset of the Default Price-Quality Path for Electricity Distribution Businesses Draft Decisions Paper*, 12 October 2009, Wellington Electricity Lines Limited.

³ *Initial Reset of the Default Price-Quality Path for Electricity Distribution Businesses Draft Decisions Paper*, 8 September 2009, Commerce Commission, paragraph 1.14, p. 6

Wellington Electricity and other interested parties to provide more constructive feedback.

1.6 For any questions related to this submission, please contact:

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