



Submission on Draft decision –
EDB IM amendment - accounting
for shifted revenue

3 December 2025

1 Submission and contact details

Consultation	Submission on Draft decision – EDB IM amendment - accounting for shifted revenue)
Submitted to	Commerce Commission
Submission address	infrastructure.regulation@comcom.govt.nz
Date submitted	3 December 2025
Email	RegulatoryConsultations@welectricity.co.nz

2 Confidential information

There is no confidential information provided in this submission. This submission can be publicly disclosed.

3 Submission

Wellington Electricity Lines Limited (WELL) welcomes the opportunity to provide a submission on the Commerce Commission's consultation on its Draft decision – EDB IM amendment - accounting for shifted revenue. We support the Commission's proposed amendments to the Input Methodologies on the basis that they ensure that both EDBs and consumers are made whole for the building blocks revenue of a DPP when an EDB transitions from a DPP to a CPP mid-period.

We agree that an amendment to the IMs provides both certainty and is a better mechanism to manage price shocks, relative to the other options presented. We note it is important that the process of shifting revenue is undertaken on a PV neutral basis.