

Information Disclosure for Water Services

Submission Template

How to make a submission

Our draft decision package for information disclosure in the water sector can be found [here](#). Attachment C in the Draft Decision Summary sets out how to make a submission, including where to send your submission, how we handle confidential submissions and preferred file format.

Submissions are due by **5pm on 20 October 2025**.

Submitter details

To check the boxes below: double click on the box, then select 'checked' under default value.

Organisation or individual name:	Wellington Water Limited (WWL) and the Establishment Team of Metro Water (MW)	
Confidentiality status of submission (tick either option):	This is a public submission that does NOT contain confidential information, and I consent to it being published on the Commerce Commission website.	☒
	This is a confidential submission that contains confidential information highlighted yellow.	☐
Reasons for any confidential information:		

Section 1: Feedback on Draft Regulatory Framework Paper

	Paragraph #(s)	Feedback	Suggested changes (if any)	Reason(s)
1	61, 91-94	Provide for exemptions	Endorse the exemption powers and recognise the legal framework and the extent of the Power. For the transition of water services into the full information disclosure requirements it is important that the costs of compliance and the extent of the exemption are sufficiently liberal in their interpretation and weighting to meet the balance that the Commission must strike, especially in the initial period from transition to operating company and the early staged progression towards maturity that new entities will be undertaking. It is proposed that this be explicitly recognised in the framework so that the risks and uncertainties of the exemption process are reduced and are clearly to organisational governance when such organisations are weighing up themselves whether to seek such exemptions and the prospects of achieving requested exemptions.	In Regional Wellington, the new entity responsible for supplying water services to 453,000 consumers will only begin operations on 1 July 2026. The entity will be the consolidation of 5 councils in the region and a prior operating company that for the first time will be responsible for ring-fencing revenue and determining priority investment and value for money. The demands for some of the early disclosure detail, the ability to bill and establish pricing and to have a clear view of a newly owned, but vast asset register, risks and liabilities will take time to achieve. The detail and degree of information necessary for AMPs and IDPs especially, must emerge from data maturity that can only begin with ensuring the governance, systems, people, and supporting resources are in place and functioning, within the context of an entirely new culture and strategic focus. These steps take time. The costs of compliance will have a temporal element and will be significantly different, with a greater impact at the outset than they will in future successive cycles, assuming the entity is achieving its investment targets. It is suggested that in such circumstances, exemption requests be assessed on a sufficiently liberal basis to ensure reasonable and balanced weighing of the costs of compliance against the benefits of disclosure. Disclosure benefits must include transparency and the ability of consumers to understand investment plans and value for money for the

				price they pay for the economic and common goods provided by water services. However, transparency and consumer confidence rely on at least reasonable minimum information being disclosed in a way that provides confidence and understanding of the investment trade-offs that need to be made. Requiring too much too early will prove counterintuitive and may impact on the careful balance trying to be struck. It may be inefficient and could well be ineffective and not in the long-term benefit of consumers.
2	62	Provide for transitional provisions	WWL and the Establishment Team endorse the inclusion of the section 53C(3)(e) and encourages the Commission to employ this approach from the outset of this new regulatory regime and not treat this power as an exception to be employed sparingly for water services regulation.	Transitional provisions are important means of establishing arrangements that do facilitate a smooth implementation to a new regime. For all water entities, of whichever structure, the regime will be new. For many, considerable organisational change and investment is required. New governance, considerable cultural and systems change, resource building of all critical positions and establishing the ways of working are required at the outset whilst continuing to deliver safe, reliable, environmentally and financially sustainable water services. In the Wellington region the Day One target for the new entity is the transfer and accountability of customer relationships, the shift of ownership for all water services assets, all compliance of operational consents, licences, permissions and capital works with funding and debt transfer arrangements in place and agreed to, alongside all critical personnel and workable systems enabling operations. New systems specified to deliver the information currently contained in the draft determination take time to deliver. Delivery timeframes do not necessarily align to regulatory timeframes, within the context of such significant change.

				In these circumstances transitional provisions that anticipate the levels of change being undertaken at the same time that the new regulatory regime is taking effect are a critical component of a robust and balanced regulatory framework.
3	78	Cost effectiveness of complying with ID requirements	WWL and the Establishment Team endorse the Commission approach to cost effectiveness outlined in the Regulatory Framework from para 76 to 79 and emphasis the need to cautiously apply the matters taken account of and the timing for adaption and evolution.	The changes to the governance, management and operation of water services are in the Wellington Region fundamentally and substantially different from how water services have been provided to the region. These are, reasonably, the most significant changes to the delivery of water services that have occurred in decades, if not our lifetimes. The magnitude of the changes takes time to bed in. The ability to provide the information sought to demonstrate outcomes consistent with outcomes produced in competitive markets, which assumes multiple competing service providers supply aspects of the service over long periods of time and thereby as part of competitive markets, will take time and cost to achieve and must be balanced cautiously against the need for all interested persons to obtain the levels of quantitative and qualitative information sought to answer the key performance questions and assessment of cost-effectiveness that provide assurance on whether the outcomes produced are indeed consistent with workably competitive markets.
4	78.1	Take into account regulated suppliers' existing practices and capability	Endorse this component and welcome assessment of the state of maturity of the practices and capability of the new entity for Wellington regional delivery	WWL is required to provide interim disclosures, quarterly. These disclosures will demonstrate that WWL as it transitions towards the new entity, that will begin operations on 1 July 2026, is by no means the equivalent of an organisation operating in a competitive market. The new entity will itself be in its infancy, having taken over the assets, liabilities, practices and capabilities of 5 councils in the region and the legacy operational company that itself had no customer relationships, no asset ownership, no financial

				management systems, multiple asset management systems that captured portions of the assets only and recorded these in very different ways for differing purposes. The strategy, investment priorities, funding arrangements, and operational practices of the new entity will be progressively determined by the new Board and Chief Executive, once in place, as they begin planning for and preparing to operate the new entity. This entity will be future focused. The strategy and planning will be developed for operation in an entirely new operating and regulatory environment within which the “market” for water services is now progressively being framed. It will be critical that each regulated supplier is assessed by the Commission in this context and it is right that this assessment (para 79) will adjust over time.
5	78.2	Consider tailoring ID requirements based on the scale, complexity and risk profile of regulated suppliers	WWL and the Establishment Team endorse and encourage tailoring of ID requirements not as an exception but rather as a starting point for the new ID requirements.	The WWL interim disclosures are a tailored package focused on key performance indicators that demonstrate: value for money investment; network performance; planning and prioritisation of capital project delivery, especially into new technology systems in preparation for the new operating environment; the capacity and capability of WWL’s people to deliver the investment and on-going operational delivery; and the ability of the entity to support the transition to the new entity that will take over consolidated operations on 1 July 2026. At Day One it is anticipated that some of the key systems and other improvements will be in place that will enable additional tools and augmentation for Day One operations including the ability to respond to emergencies and extreme events. However, the changes will be occurring in manageable phases within a finite capital budget. Operation for water service delivery must be seamless to ensure critical supply and

				services are delivered to all the region's consumers. Tailoring ID to match the maturity state of the organisation will be critical to ensure that the costs of compliance and the negative impacts of potential non-compliance are balanced with the desire and focus of information disclosure transparency.
6	78.4	Focus on information that will have the biggest benefit for understanding and influencing performance of regulated suppliers	WWL and the Establishment Team endorse the approach of prioritising performance information that will benefit consumers most in terms of their understanding and influence.	Keeping the Commission focus on the greatest net benefit to consumers in order to understand performance of regulated entities is an essential component not only of enabling transparency but in minimising the costs of compliance. The key is balancing this factor with the other factors set out at para 78 and ensuring that the IDs are commensurate with the market being regulated. In Regional Wellington's case, there are key foci that will be front of mind when implementing the water services delivery plan recently accepted under the Local Government (Water Services Preliminary Arrangements) Act 2024: • Funding of water services including by engaging with the Local Government Funding Agency • Planning, prioritising, and delivering the key capital projects that will have an impact on the water charges price path • How growth is managed and funded • What the pricing and projected charging of water services will be • Ensuring the benefits of the capital improvement programmes are carried over and consolidated in the new entity.

				Information in such circumstances should be tailored and transitioned in a manner that ensures that the information with the greatest benefit to consumers is sought and provided during the period of transition and consolidation
7	78.7 & 79	Evolve the requirements over time	WWL and the Establishment Team endorse this approach and agree that evolving IDs aligns to how operating companies in the regulatory and operating environment will develop and mature.	Benefit and influence will change as information improves off the back of improved consistent data collection, maturing investment and charging processes and the experience and knowledge gained by staff with the capability and capacity, working with updated systems and processes. In these circumstances it is reasonable and balanced for the commission to expect on behalf of consumers that focused and evolving ID requirements will provide richer information for consumers to better understand a regulated entities' performance
8	91	Exemptions – discussed above at #1 para 61		

Section 2: Feedback on proposed ID requirements

Draft Determination

	Clause #(s)	Feedback (eg, costs, tailored or delayed implementation, value to stakeholders, reporting frequency, efficiency)	Suggested changes (if any)	Reason(s)
1.	3.3	Value to stakeholders	Revision to level of detail per year	We question the value of reporting significant issues by year (<i>"for each of the 30 consecutive financial years"</i>). Significant issues are likely to span multiple years but not necessarily be easily tied to one particular year. This would particularly be the case for issues anticipated later in the 30-year period. Suggest requiring significant issues to be reported on in 5-year blocks of when they are 'likely to occur' instead. E.g. in the first five years x,y,z significant issues may occur, in the following five years other issues may occur.
2.	3.4	Delayed implementation.	Yes	Support delaying the 'Additional disclosures' in the following Schedule 3 Clauses to the 2nd cycle at a minimum due to difficulty in gathering information and reporting: • C2: WWL is currently building capability around the business to develop an asset management framework but there are currently significant information gaps that will take time to gather. Developing the framework includes processes, documented workflows and all of the additional disclosure requirements won't likely be available by 30 June 27. Propose delaying to the 2nd or 3rd SAMP. • C3: Risks currently sit with councils not WWL. There isn't currently a risk framework or prioritisation framework to provide consistency in the application of risk assessment or to prioritise addressing risk and guide investment decision-making. This will likely take some time to develop.

				• C4: WWL has been very reactive focused to date due to funding constraints. This needs to be shifted back to a focus on planned/proactive maintenance. The available systems mean it would be difficult to report on the 'additional' disclosure proposed. Again, the prioritisation framework is a big gap and will require input from Metro Water. • C5: Suggest the information proposed in this clause is not critical in the early years of reform and should be considered once the organisation is more mature, perhaps the third cycle.
3.	3.5	Delayed implementation.	Yes	Support delaying the 'Additional disclosures' in the following Schedule 3 Clauses to the 2nd cycle at a minimum, due to difficulty in gathering information and reporting: • C7: Suggest the additional information proposed in this clause is not critical in the early years of reform and should be considered once the organisation is more mature, perhaps the third cycle. • C8: Data gaps are closing and with very / high critical assets prioritised for condition assessment. However, there is more work required to validate age-based desktop condition ratings with actual condition assessment data. Once again investment prioritisation is a big gap here. • C9: Information systems are poor and in places owned by external parties. The asset management information system (AMIS) being rolled out in the TSI programme will not be operational in time for the first disclosures, as currently proposed in the draft. This presents a risk to reporting in all aspects of asset management. • C10: Performance measures framework is currently not mature. Work needs to be done to link to investment and create consistency of measures. This will take some effort but may be done in time for the first proposed disclosure date.

				• C11: Will be able to provide info on this at a high level initially but not go into micro level detail. As asset management maturity improves, so too will the level of information that can be produced in this area but currently this is a big gap for WWL and the new entity. • C12: Can likely provide most of the info required here but interdependencies are unlikely to be able to be provided. • C14: Significant amount of work required here, including hierarchy of investment. • C15: The working AMP details the improvements required to the AM system and processes. WWL knows where improvement effort is needed, but this will take time and resources to implement.
4.	3.6	Delayed implementation.	Yes	Support delaying the 'Additional disclosures' and some of the basic disclosures proposed in the following Schedule 3 Clauses to the 2nd cycle at a minimum, due to both difficulty in gathering information and reporting, and value to consumers: • C18: Until we have upgraded the asset management information system (AMIS) and improved data quality there are likely to be many challenges in Metro Water's ability to provide links between asset performance and investment decisions. • C19: Value to consumers - these are disclosures that should be considered once the new organisation has had time to settle in and create some consistency in delivery performance under the new model.
5.	3.7	Delayed implementation.	Yes	Support delaying the 'Additional disclosures' to the 3rd cycle due to difficulty in gathering information and reporting prior to systems being in place. There would be significant effort required to report on these disclosures while going through transition.
6.	4.9	Delayed Implementation	Defer to at least 27/28	Will be unable to deliver until new billing system is implemented

7.	5.2	Delayed Implementation	Amend implementation to 27/28 or after	Will need changes in finance system
8.	6.7.1	Delayed Implementation	We recommend delaying implementation of this to apply from the 2027/28 year. It is unclear why costs of councils' billing on behalf is MW included in c) rather than a).	WWL tracks many of these costs, but our finance system is not configured to group and report on them. Councils hold other aspects of these costs currently. Metro Water will track these costs, but will not have a new finance system at the start of the 26/27 financial year. The new system would be configured to align with information disclosure requirements and enable categorisation and reporting. Any reporting ahead of the implementation of a new finance system will require significant staff time to manually categorise using spreadsheets, and data confidence would be medium. Reconfiguration of current systems would take significant effort that may be duplicated in setting up new system.
9.	6.7.2a	Delayed Implementation	We recommend delaying implementation of this to apply from the 2027/28 year.	As above – see 6.7.1
10.	6.7.2b	Delayed Implementation	We recommend delaying implementation of this to apply from the 2027/28 year.	As above – see 6.7.1

11.	6.16	Delayed Implementation	We recommend delaying implementation of this to apply from the 2027/28 year.	WWL can report on the main categories of 'growth', 'levels of service' and 'renewals', but we do not track against other proposed ID sub-categories at present. Councils hold other aspects of these costs currently. Metro Water will track these costs, but will not have a new finance system at the start of the 26/27 financial year. The new system will be configured to align with information disclosure requirements and enable categorisation and reporting. Any reporting ahead of the implementation of a new finance system will require significant staff time to manually categorise using spreadsheets, and affect data confidence. It will involve considerable interaction with the five councils also and the overall costs are likely to exceed the benefits in the interim period as they will require adaption and manual work arounds within the five councils also.
12.	6.21	Delayed implementation		Whilst WWL have valuation unit rates, councils use different valuers, and the unit rate assumptions and valuation methodologies differ between valuers. Metro Water will have to calculate weighted average rates to report on ID requirements and data confidence will be medium. Further work needs to be done to establish a unit rate database based on our contract data (limited by the type of work we deliver and sample size) which Metro Water will need to build up and analyse. It is anticipated to take some time to establish and will require significant staff time. The intention will also be to consolidate and ensure valuations are consistent across the entire regional network. This too will take some time to achieve and be subject to the agreed priorities for operational focus, endorsed by the Metro Water Board and Executive teams, each of which are yet to exist.

13	6.23	Delayed Implementation	We recommend delaying implementation of this to apply from the 2027/28 year.	WWL has its own allocation process which is done manually in spreadsheets and is very complex and labour intensive due to how our finance system is currently configured. Councils also have their own allocation methodologies which are different to WWL's. Metro Water will not have a new finance system at the start of the 26/27 financial year, which means the allocation methodology will still be dictated by current complex system configurations. The new system will be configured to allow us to simplify processes and enable automation and reporting. Any reporting ahead of the implementation of a new finance system will be based on manual calculations and categorised using spreadsheets, and data confidence would be medium, at best.
14	6.18			It is unclear why c) 'cybersecurity' is separately pulled out here rather than as an asset component
15	General			Wording is overly prescriptive – lot of 'must's, this seems to be at odds with the suggestions in the summary and explanatory papers regarding the desire for flexibility and balance and the regulatory framework paper in terms of proportionality and recognition of the careful balance that must be struck between regulatory costs (which are ultimately paid by consumers) and transparency of the greatest benefit information for consumers to understand regulated supplier performance.

Answer on question in Draft Decision Summary on support for implementation

Draft Decision Summary - Support

What type of support would most help regulated suppliers comply with our ID requirements, and why?

Put a cap on the number of requirements that you have. Be careful over time that the requirements do not grow.

Ideally have **two** papers next time that explain the requirements for finance, and for asset management. Make those papers read like a book ie start to finish without ideally having to go to other areas in the document or to other documents. The package of four documents was hard to read and also hard to report on and allocate responsibility for internally. A supporting spreadsheet with clear questions and definitions would also help.

Support regulated suppliers to assess and provide the Commission with the potential costs of compliance, and use these estimates to guide the choice of the requirements that will have the most impact for least cost.

Answers to the questions set out in the Explanatory Paper

Explanatory paper – Financial questions

Capital expenditure: Capital expenditure is to be reported in specified categories

1. Do you think the proposed categories are appropriately defined and sufficiently detailed to capture the key aspects of regulated suppliers' capex? If not, what changes to the definitions do you think we should make, and why?

No. The proposed categories are very detailed, and it is challenging to identify the best way to capture them in a financial system fixed asset register. Ideally each asset will be treated as a complete unit to minimise administrative burden and processing risks during disposals, transfers and revaluations. It will be challenging to determine proportionate allocation to growth, LOS and renewals and respective sub-categorisation and to capture it for reporting.

2. Do you think there are instances where multiple categories should be combined into one? If so, which categories, and why?

There is inconsistency about how the categories have been applied across the headings. For instance, only for renewals is this broken down by water and asset type. The approach should be more consistent.

3. Do you think we should add any additional categories of capital expenditure? If so, what and why?

There is inconsistency about how the categories have been applied across the headings. For instance, only for renewals is this broken down by water and asset type. The approach should be more consistent.

4. Do you think certain regulated suppliers should only need to report expenditure in the high-level categories—growth, levels of service, and renewals? If so, please explain.

Yes. It will be challenging to determine proportionate allocation to growth, LOS and renewals and respective sub-categorisation and to capture it for reporting. There is value in showing the expenditure by water type, but this should be applied consistently.

Capital expenditure: Capital expenditure on network assets must be apportioned between categories

5. Do you consider this approach (apportionment of expenditure) to be practical and implementable? If not, please explain the specific challenges regulated suppliers may face in complying with this requirement, including the likely cost of any required changes to regulated suppliers' existing practices, and any potential difficulties in auditing the information. We also welcome suggestions for alternative approaches that could provide adequate transparency of regulated suppliers' capital expenditure.

No. The practical application of proportionate allocation is difficult to capture in finance fixed asset registers in a consistent and low cost administration. It would be more practical and implementable to report on annual spend in WIP against these categories but not need to maintain categorisation across full asset list.

Capital expenditure: Capital expenditure components

6. Will there be regulated suppliers reporting under the for-profit accounting standards? If so, which ones?

We expect that Metro Water will be a Public Benefit Entity.

Operating expenditure: Operating expenditure is to be reported within specified categories

7. Do you think the categories are appropriately defined and sufficiently detailed to capture the key aspects of regulated suppliers' opex? If not, what changes to the definitions do you think we should make, and why?

Unsure. The categories do not seem intuitive compared to other govt or local authority breakdowns, and it would be good to understand the value of knowing the breakdown by specific costs, and to understand the thinking around consequential opex. Any costs would fit into the other categories.

8. Do you think we should add any additional categories of operating expenditure? If so, what and why?

We suggest including impairment or write-off of assets.

9. Do you think the proposed maintenance categories (planned, predictive, unplanned) are appropriate for the water sector and can they be reported on? If not, what changes should we make, and why? What, if any, additional costs would this reporting impose on regulated suppliers?

Yes. This information can be captured at point of transaction, and is captured currently by WWL.

10. Do you think there are categories of expenditure that regulated suppliers should be able to combine if the amounts are below a certain materiality threshold, particularly for expenditure forecasts? If so, what would be an appropriate materiality threshold, and why?

Yes. We suggest using an 'other' category, or a separate 'smaller items' category, with a threshold of <\$5M

Expenditure on changes to entities: This expense component is intended to capture capex and opex relating to the transfer of water services to a new or different entity

11. Do you think the ‘expenditure on changes to entities’ category is adequately defined to capture the range of costs regulated suppliers will incur? If not, what changes do you think we should make, and why?

In principle this is a good thing to do. However, it may be challenging for it to be applied consistently. We would recommend deferring benefit reporting initially and aim for transition over time.

12. Do you see any practical challenges involved in preparing, or auditing the disclosure of ‘expenditure on changes to entities’? If so, please explain these and how we might change the proposed requirement to address these.

Some councils may not have captured such costs separately and even if they have, it will involve a data capture exercise across all entities (including councils that may not otherwise be subject to ID) as this information is not held within the water services entity.

Asset values: Information about asset values and movements in asset values will be required in the financial statements in regulated suppliers’ water services annual reports, for specified network asset classes

13. To what extent do regulated suppliers currently maintain the necessary asset information at the proposed level of disaggregation?

WWL does not currently capture information by direct purchase vs WIP transfers and Metro Water would need to establish alternative means to capture.

14. If regulated suppliers do not already maintain the necessary asset information, what would be involved in changing the way asset information is recorded in order to comply with the proposed ID requirements, and what is the likely cost of these changes?

This would be a time-consuming manual process which would involve a lot of assumptions. Through the TSI programme we will be aiming to build this capability, however it will require significant effort to update existing information. Prior to TSI implementation, we may be able to meet some asset reporting but not all.

Actual revenue and other income: We are proposing regulated suppliers' actual revenue and other income is reported within specified categories

15. Do you think the proposed revenue and other income categories are appropriately defined and sufficiently detailed to capture the range of regulated suppliers' revenue sources associated with regulated services? If not, what changes to the definitions or level of detail do you think we should make, and why?

Yes.

Actual revenue and other income: Regulated suppliers would be required to disclose detailed information about revenue from usage charges and rates

16. Do regulated suppliers currently maintain the necessary information to support detailed disclosure of revenue from usage charges and rates? What, if any, additional costs would this reporting impose on regulated suppliers?

Unsure. This will depend on what councils are able to provide, and the set of new systems

17. For regulated suppliers operating under a split decision-making model, is the proposed detailed disclosure of revenue from usage charges and rates workable, given collaboration with related organisations (eg, shareholding Councils) may be required to complete a consolidated disclosure, where water services are funded from rates? If not, what changes should we make, and why?

We don't believe that Metro Water would operate under a split decision-making model. We do not have a view on what changes should be considered for a consolidated disclosure.

Financing and funding arrangements

18. Do you think that the disclosure requirements relating to financing and funding arrangements could be reduced or streamlined while still providing sufficient information for stakeholders to understand the financial sustainability of the regulated supplier? If so, what changes to the disclosure requirements do you think we should make, and why?

No suggestions.

Pricing: Regulated suppliers would be required to disclose information about all charges, including non-standard charges and charges with small numbers of customers

19. Do you have concerns about the proposed requirement to disclose information about non-standard charges and charges applied to a small customer base, because of commercial sensitivity? If so, please describe the nature of your concerns.

We do not have concerns, but note that the option of confidential disclosure is a good one. Some councils may have confidential agreements which could cause a breach of contract.

Financial sustainability indicators

20. Do you think it would be beneficial to also require any of the financial sustainability indicator forecasts to be reported in real terms. If so, which indicators and why?

No. This could create a risk of confusion, without clarity of the value offered. It is better that analysts do any conversion for their own purposes, rather than embedding in a reporting process, else inconsistency in reporting can be masked.

Revenue and funding indicators: Ratio of cost of water services as a proportion of household income

21. Is there also non-residential data (instead of just household income) that you think we should require to create a similar but non-residential indicator? If so, which data?

No. We expect that there is too much variation in non residential to come up with a valid single indicator.

22. Do you think the measure expressing water service charges as a percentage of household income should also be reported using alternative income thresholds, such as the lowest decile (10th percentile) or the lowest quartile of household income, in addition to the median? If so, which thresholds?

Analysis of the information by various elements should always be an option, but we do not have a view on what might be appropriate thresholds. Presenting as a distribution curve is always useful, rather than by thresholds. It would be better to disclose the data, rather than embed analysis within the disclosure request.

Explanatory paper – Implementation settings questions

Director's certification

23. Do you think there are specific disclosure areas where the proposed ID requirements for assurance may not be necessary or may not provide additional value relative to the cost and effort it would take to implement?

If so, please explain your reasons including specific challenges in complying with these requirements such as likely cost of any required changes to regulated suppliers' existing practices and how we might change the proposed requirement(s) to address these.

If all the relevant internal quality assurance process has been executed, then it would be more appropriate for the Chief Executive to sign off on the disclosure. SAMP, AMP etc. These key documents would be reasonably expected to have gone through the appropriate management and governance processes before they are finalised and sometime before they are disclosed.

We cannot see the value add that getting the Directors to certify would add.

Noting that not all the disclosures that will be made are from limited liability companies with Directors and that Councils too will be required to make submissions. In the same context would the certification extend to the politically elected representatives i.e. Mayor.

24. We also invite comment on the appropriateness of the proposed certification criteria for the matters being certified, including whether the criteria are fit for purpose and aligned with the type of information being disclosed and certified.

25. Do you think there are particular types of disclosures where Chief Executive level certification would be more appropriate than what we are currently proposing?

If so, please outline which disclosures would benefit from this approach and why, and describe any challenges regulated suppliers might face in meeting our proposed requirement (such as likely cost of any required changes to regulated suppliers' existing practices) that could be better addressed through this level of certification.

As above

What can be kept confidential: Commission-only disclosures

26. Are there other types of information proposed for public disclosure that you think should be disclosed to the Commission on a Commission-only basis because they are confidential, commercially sensitive or only relevant for compliance monitoring? If there are, please say what those types of information should be and explain why these should be disclosed to the Commission only.

There may be arrangements in the Transfer Agreement that have aspects of commerciality or privacy which would indicate the need for Commission-only confidentiality.

Geographic disaggregation

27. Do you prefer either Alternative 1 or Alternative 2 to the proposed ID requirement? If so, which alternative do you prefer, and why? - page 63

Alternative 2 is preferable. Once we move to harmonisation of pricing, it will be preferable to be able to manage assets on a region-wide basis. Alternative 1 would lock us into continuing to run multiple budgets, reducing the potentials for efficiency and more strategic investment.

Other comments

In this section you can provide any general or specific comments you may have on our draft decision, that may not be covered by the previous sections above. We ask that you please reference the appropriate document, section and/or page number where possible.

Other comments