



Reconsideration of DPP4  
default price-quality path  
for Wellington Electricity  
– Central Park 2  
unforeseeable large  
project

16 January 2026

## 1 Submission and contact details

Consultation	Reconsideration of DPP4 default price-quality path for Wellington Electricity – Central Park 2 unforeseeable large project
Submitted to	Commerce Commission
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Date submitted	14 January 2026
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## 2 Confidential information

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

## 3 The reopener process

Wellington Electricity Lines Limited (WELL) support the Commerce Commission’s (Commission) draft decision on our reopener application ‘*Reconsideration of DPP4 default price-quality path for Wellington Electricity – Central Park 2 unforeseeable large project draft decision*’. The additional allowance allows us to address a resilience risk of Central Park substation, that was first identified by Transpower in 2009. The cost of this project was not known at the time of setting DPP4 and has become essential due to the heightened risk profile associated with the existing Central Park substation, which represents a single point of failure for a significant portion of Wellington’s electricity network.

WELL thank the Commission for their responsiveness throughout the reopener process. The Commission’s RFI process and subsequent content in the draft decision reasons paper, allow EDBs to be more efficient in their reopener applications that outline clear expectations of what the Commission needs. When EDBs can provide additional valuable information to the Commission, the faster, and more streamlined the reopener process will be.

### 3.1 Importance of reopeners for DPP4

The DPP4 final decision allowed 40% of WELL’s forecast capex expenditure. This means that there is very little wriggle room for other capex projects to be deferred without having a detrimental impact



on customers. When projects like CPK2 arise, the reopener process is vital to enable WELL to complete the rest of our capex plan and maintain quality standards on our network.

WELL is encouraged by the reopener efficiency since our application was submitted on 3 September 2025, and a draft decision was published on 16 December 2025. WELL is hopeful that the Commission can maintain this level of cadence if there is an influx in reopener applications across the DPP period.

We endorse the Commission's draft decision in full. By applying the reopener mechanism as intended—only when clear need and prudence are demonstrated—the Commission reinforces trust in the regulatory framework and promotes balanced investment. Allowing us to recover costs associated with Central Park 2 through a modest price-path adjustment is a fiscally responsible step that addresses a serious system risk.

