

15 December 2021

Dane Gunnell
Manager, Input Methodologies Review
Commerce Commission
Wellington

By email to
regulation.branch@comcom.govt.nz

Dear Dane,

**UNISON SUBMISSION ON COMMERCE COMMISSION'S DRAFT DECISION TO REOPEN
UNISON'S PRICE PATH FOR MAJOR CUSTOMER CAPEX**

We appreciate the opportunity to submit on the Commission's Draft Decision.

Unison supports the Commission's draft decision to reopen the default price path applying to Unison.

We have examined your calculations to determine the additional revenue allowances and believe these are correct.

The mechanisms to deliver the additional revenues are complex. We have attempted to implement the adjustments within our compliance model to check they deliver the intended revenues and our initial assessment is that they may not deliver the intended revenues. We would welcome opportunity to discuss further with Commission Staff to ensure we have understood the adjustments we need to make.

Yours sincerely



Nathan Strong
GENERAL MANAGER COMMERCIAL