



TRANSPOWER

Keeping the energy flowing

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11 July 2019

Dane Gunnell
Manager, Price-quality Regulation
Commerce Commission
Wellington

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

Dear Dane

Submission on draft of Transpower's individual price-quality path from 1 April 2020

Transpower welcomes the opportunity to comment on the draft of Transpower's individual price-quality path (IPP) from 1 April 2020, released on 14 June 2019. This letter and the attachment should be read in conjunction with our submission on the RCP3 draft decision filed with you on 27 June 2019.

Our principal concern has been to ensure that drafting of the quality standards is clear; we think the draft can be materially improved in that respect. Further, the concept of normalisation has not been reflected clearly in the draft. We consider that normalisation should be explicitly evident in relevant provisions of the final IPP.

We have commented only on matters in the draft that we believe should be amended or are relevant to matters raised in our 27 June submission on the draft decision.

My team remains available to discuss any of the matters raised in this letter or the attached table.

Yours sincerely

Alison Andrew
Chief Executive