



TRANSPOWER

Waikoukou
22 Boulcott Street
PO Box 1021
Wellington 6140
New Zealand

+64 4 495 7000

www.transpower.co.nz

Commerce Commission

By Email: infrastructure.regulation@comcom.govt.nz

27 August 2025

Fibre Input Methodologies review 2027 – Issues Paper (Tranche 1)

We welcome the opportunity to cross-submit on the Commerce Commission's (Commission's) consultation on the Fibre Input Methodologies (IM) Review 2027 issues paper (Tranche 1), published 10 July 2025.

We recognise the broad support from industry participants for the implementation of a trailing-average cost of debt (TACD). As such, we support the requests for the Commission to hold workshops to provide clarity on its proposed methodology, should it decide to adopt a TACD. In addition, a TACD-focused technical consultation period may be useful to better cover the specific views of industry participants.

We would welcome an opportunity to participate in such a process.

Yours sincerely,

Joel Cook

Head of Strategy and Regulation