



MAJOR ELECTRICITY USERS' GROUP

24 August 2007

Jenny Walton
Electricity Commission
By email to info@electricitycommission.govt.nz

Dear Jenny

Submission on Benchmark agreement review and associated rule changes

1. This is a submission by the Major Electricity Users' Group (MEUG) on the consultation paper *Benchmark Agreement review and associated rule changes* published by the Electricity Commission (the "Commission") on 27 July 2007.
2. Given a lack of sufficiently disaggregated historic information on connection asset availability and reliability as required by the Benchmark Agreement then the proposal set out in section 4.2 of the consultation paper is a pragmatic short-term fix. The near term objective should continue to be that Benchmark Agreements have more disaggregated availability and reliability measures. The short-term fix shouldn't become the new status quo.
3. MEUG suggest the rules and Benchmark Agreement need to clearly state an appropriate date by which Transpower must table with Designated Transmission Customers for there consideration disaggregated connection asset availability and reliability measures. Transpower will need to decide what methodology to use to estimate those measures given there is and will in the near term be little historic data.

Yours sincerely

Ralph Matthes
Executive Director