



# MAJOR ELECTRICITY USERS' GROUP

29 November 2010

Lisa DuFall  
Electricity Commission  
By email to [submissions@ea.govt.nz](mailto:submissions@ea.govt.nz)

Dear Lisa

## **Submission on consultation paper – Consultation Charter**

1. This is a submission by the Major Electricity Users' Group on the Electricity Authority consultation paper "Consultation Charter" published 8<sup>th</sup> November 2010<sup>1</sup>. Comments follow ordered in sequence as mentioned in the consultation paper.
2. Paragraph 2.2.5 of the consultation paper refers to the onus on proponents for Code amendments to have a compelling explanation of why a Code amendment is needed rather than relying on non-Code approaches. There is a policy risk that the supply side will dominate proposed Code amendments because they have far greater dedicated resources than consumers. This asymmetry of resources issue is commented on in more detail in the separate MEUG submission on the Charter about advisory groups.
3. It is unclear what "size" refers to in bullet point three of paragraph 4.10 in Part 1 of Appendix A, Draft Consultation Charter.
4. MEUG suggest a new sentence be added to paragraph 2.6 of Part 2 of Appendix A, "*The Authority will publish forecast dates at which future consultation and discussion papers are to be released.*" Publishing this information will allow interested parties to efficiently plan and manage resources to participate in consultation rounds. Signalling ahead of time dates for various consultation rounds was a helpful approach by the Commerce Commission in implementing Part 4 of the Commerce Act.

Yours sincerely

Ralph Matthes  
Executive Director

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<sup>1</sup> Refer <http://www.ea.govt.nz/our-work/consultations/corporate/consultation-charter/>