



MAJOR ELECTRICITY USERS' GROUP

9 March 2011

John Groot
Regulation Branch
Commerce Commission
By email to regulation.branch@comcom.govt.nz

Dear John

Submission on Information Disclosure Regulation: Process and Issues Paper

1. This is a submission by the Major Electricity Users' Group on the Commerce Commission Process and Issues Paper "Information Disclosure Regulation - Electricity Lines Services and Gas Pipeline Services" dated 23rd February 2011¹.
2. MEUG welcomes the Commission intention to focus on² consolidated disclosures, related party transactions, disclosures for mergers & acquisitions, Asset Management Plans and contract disclosures in the Discussion Stage. These areas of focus and other work proposed are sufficiently broad to cover the points made in the MEUG submission of 11th September 2009³ except for two issues:
 - The MEUG proposal that CEO compensation contracts be disclosed; and
 - Considering optimal timing for various disclosures.
3. It would be helpful to have the Commission views on the above two items in the April to May Discussion Round than wait for the draft reasons paper in early September.

Yours sincerely

Ralph Matthes
Executive Director

¹ Refer <http://www.comcom.govt.nz/assets/Gas/Information-Disclosure/ProcessIssues/Information-Disclosure-Regulation-Electricity-Lines-Services-and-Gas-Pipeline-Services-Process-and-Issues-Paper-23-February-2011.pdf>

² Paragraph 35 to 51 of the Process and Issues Paper

³ Refer <http://www.comcom.govt.nz/assets/Electricity/Information-Disclosure/ID-DiscussionPaper-2009/MEUG-Submission-on-Information-Disclosure-Discussion-Paper-11-September-2009.pdf>