

9<sup>th</sup> November 2012

Dr Brent Layton  
Chair  
Electricity Authority

Dear Brent

The consultation timeframe and the material initially published by the Authority for the Transmission Pricing Methodology (TPM) review is insufficient for interested parties to adequately test and formulate responses. We welcome the Authority's ongoing publication of further information in response to questions. The announcement of an extension of the consultation period this week is also welcome but insufficient.

End customers find it difficult at the best of times to understand and give feedback to the Authority on proposed changes in the electricity Code. In the case of the proposed change in the TPM there may be potential material downsides initially for all end customers. We are encouraged with the Authority response to answer questions and attend customer meetings to discuss the proposals. This all takes time. Extending the consultation period should be seen as an investment to allow all parties to fully understand and develop responses including any improvements to the proposed design. With the summer holiday period and resourcing difficulties faced by all parties, the revised close of submissions deadline of 30<sup>th</sup> January is an improvement but insufficient.

We recommend the Authority extend the close of submissions deadline to 28<sup>th</sup> February and close of cross-submissions three weeks later on 21<sup>st</sup> March. This is not as long as some parties, such as MEUG, had originally requested. Nevertheless we believe a close of cross-submission phase by the third week of March is a good compromise for all parties and the Authority.

As there is a public interest in ensuring the best possible Transmission Pricing Methodology is implemented and that is more likely to be achieved by the best possible review process, this letter is being made public.

Yours sincerely



Sue Chetwin  
Chief Executive  
Consumer NZ



Kim Campbell  
Chief Executive  
EMA



Ralph Matthes  
Executive Director  
Major Electricity Users' Group