

31 May 2019

Electricity Authority
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Default Distributor Agreement Consultation Timing

1. This is Vector Limited's (Vector) response to the Electricity Authority's (the Authority) consultation on the timing of its consultation on the Draft Default Distributor Agreement (*Draft DDA*).
2. Vector is of the strong view that the Authority should defer this consultation from June 2019 to a much later date. Our regulatory workload is extremely heavy during this period, having to deal with multiple ongoing and upcoming consultations that have implications for the electricity sector, including the following, among others:
 - a. Transmission Pricing Methodology – consultation in July 2019;
 - b. ACCES Project Quick Wins consultation – submissions due on 11 June 2019;
 - c. Distribution Pricing Principles – release of decision paper in early June 2019, then implementation;
 - d. Default Price Path for electricity distribution businesses for 2020-2025 – submissions due on 18 July 2019;
 - e. Spotlight on Emerging Contestable Services – consultation in June 2019;
 - f. Electricity Distribution Information Disclosure – must be published by 31 August 2019;
 - g. Electricity Price Review – final recommendations in mid-2019, then implementation;
 - h. Zero Carbon Bill – consultation at Environment Select Committee stage;
 - i. Emissions Trading Scheme amendments – consultation this year, in the context of the Zero Carbon Bill; and
 - j. Options for amending the Gas Act – submissions due on 12 June 2019.
3. The above list reflects our need to deal with more urgent regulatory matters than the DDA. We believe this is the case for most other industry participants.
4. In addition, consultation on the *Draft DDA* at a later date will provide us with sufficient time to consider it more carefully. This is particularly important given the DDA's wide-ranging implications for our electricity distribution business and customers.
5. Furthermore, with the impending release of the Electricity Price Review recommendations, we believe the Authority should focus on more urgent issues such as those affecting the wholesale electricity market.
6. Please contact Luz Rose (Senior Regulatory Specialist) if you have any questions or require further information at Luz.Rose@vector.co.nz or 04 803 9051.

Yours sincerely
For and on behalf of Vector Limited



Richard Sharp
Head of Regulatory and Pricing