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2013/2014 EECA levy consultation

1. Vector welcomes the opportunity to respond to the Electricity Efficiency and Conservation Authority's (EECA) consultation paper *2013/2014 Appropriations and Work Priorities, and EECA Work Programme*, dated 25 September 2012. No part of this submission is confidential and we are happy for it to be publicly released.
2. Vector's contact person for this submission is:
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3. Vector appreciates the proactive approach that is being taken to the 2013/2014 consultation round by publishing the consultation two months earlier than in previous years. The timeliness allows parties to properly provide useful and constructive feedback on the forthcoming work programme and allocation of expenditure
4. The EECA proposes a real-terms decrease in their budget, i.e. the 2012/2013 and 2013/2014 appropriations are both at \$13m. Vector considers this a reasonable reduction in spending and a positive outcome for levy payers.
5. Consistent with our 2012/2013 appropriation submission, Vector is also concerned with the lack of evidence to support the EECA's view that their projects are value for money, and that their forecasts are beneficial and provide significant benefits to consumers.

6. For instance, data from the consultation paper suggest:

	Annual rate 2006-2012	Annual rate 2013-2014
Electricity savings	159.5 GWh	273 GWh
Peak demand reduction	60.7 MW	182 MW
PV of savings	\$86.7m	\$224m

7. It would be helpful if the EECA could provide more insight into, and explanation for, the projected savings described in paragraphs F.13 and F.27 of the consultation paper.

Yours sincerely,



Bruce Girdwood
Manager Regulatory Affairs