

Jan Weaver

28 September 2007

2013 Review
Electricity Group
Energy and Communications Branch
Ministry of Economic Development
P O Box 1473
WELLINGTON

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Dear Sir

SUBMISSION ON REVIEW OF SECTION 62 OF THE ELECTRICITY ACT
1992 'CONTINUANCE OF SUPPLY'

This submission is in support of a **continued obligation to maintain supply, using lines or alternatives, with no expiry date**. The reasons in support of this option are as follows.

1. The electricity network is an essential national infrastructure comparable to roading and telecommunications that provides local, regional and national benefit to communities, business, and government. Therefore, the maintenance of supply should be perpetual.
2. The certainty and reliability of electricity supply to all parts of the nation is essential to maintain economic and community wellbeing. Rural users should not be disadvantaged by their remoteness, and access to and cost of supply to rural users should be comparable to other users.
3. Districts such as Hurunui have many small communities within predominantly large rural areas so that 'remote' users (in terms of economies of scale for servicing) can actually be in close proximity to settlement. As a result, the ends of roads and the ends of supply lines have particular importance, as a single user at the end of the line can make a disproportionately large contribution to the vitality of the whole district. In some instances the land owner has been required to meet the full cost of the initial installation to ensure a supply and should not be expected to pay again to maintain that line. In other instances little line maintenance has been undertaken since installation due to the low user ratio. Rural users should not be penalized for the line company's lack of foresight to undertake preventative maintenance because this is considered uneconomic to the company.

4. The principal objective for the Electricity Commission under the Electricity Act 1992 is for all classes of consumers to have electricity that is delivered in an efficient, fair reliable and environmentally sustainable manner. Therefore, we support the assessment of options under the criteria of: efficiency; fairness; reliability; and environmental sustainability provided that equal weighting is given to each criterion. We further submit that the criterion for environmental sustainability should not only consider the effects on the environment (including people as part of the environment), but should also consider potential effects on climate change, and whether the supply is generated from renewable energy sources.
5. The use of alternatives to lines will encourage the development of new knowledge and expertise in remote area power generation. This could result in innovative solutions that provide new business opportunities, greater and more informed choice for consumers, and possibly better environmental outcomes.

Yours sincerely

Jan Weaver
POLICY PLANNER