

3 October 2007

Electricity Group  
Energy and Communications Branch  
Ministry of Economic Development

Email: janet.humphris@med.govt.nz

**Attention: Janet Humphris**

Dear Ms Humphris

**Submission on review of Section 62 of the Electricity Act 1992 'Continuance of Supply'**

Watercare Services Limited (“Watercare”) is New Zealand’s largest water and wastewater company, jointly owned by the city and district councils of Auckland, Manukau, Waitakere, North Shore, Papakura and Rodney. It is a council-owned organisation under the Local Government Act 2002.

The company draws water from 12 sources, treats it to A-grade quality and supplies it to six local network operators who on-sell it to 1.2 million consumers. The company operates a wastewater treatment network, receiving wastewater from the Greater Auckland area and treating it at the Mangere Wastewater Treatment Plant.

The nature of our responsibilities for the public health and environmental protection means that it is essential that Watercare has access to reliable power supplies and telecommunications services.

Having regard to the review of Section 62 of the Electricity Act 1992 we are keen to ensure:

- Any revision includes clear definition of “uneconomic supplies” so that the effect of the clause and its implementation for Watercare can be assessed.
- Transitional arrangements within the electrical supply industry that are able to be defined in sufficient time for essential services to mitigate any negative effects and that are addressed in an equitable manner.
- That any changes do not result in a negative impact on the level of service offered to Watercare since this could, in turn, lead to a reduction in our ability to maintain security of water and wastewater utility service supply.

The key issue for us is to ensure the provision of water and wastewater supply in the Greater Auckland area is not compromised.

I would like to thank you for the opportunity to make this submission and would be happy to expand on this should you have any questions.

Yours sincerely

Dominic Hollewand  
**Manager**  
**Energy and Control Systems**