



C O U N T I E S P O W E R

16 March 2007

Manager
Electricity Group
Energy & Communications Branch
Ministry of Economic Development
P O Box 1473
WELLINGTON 6140

Dear Sir / Madam,

Submission – Draft Government Policy Statement on Electricity Governance

1. The following submissions on the draft Government Policy Statement on Electricity Governance, are made on behalf of Counties Power Limited (CP).
2. CP is a trust-owned electricity lines company operating in south Auckland and north Waikato. We serve some 85,000 people through approximately 35,500 customer connections. CP (formerly Franklin Electric Power Board) has developed and operated the local electricity network since 1925.
3. In our view the commission is more likely to make coherent, effective and defensible decisions if continues to use advisory groups in the manner contemplated by paragraph 7 of the existing GPS, particularly if these groups include appropriate industry representation. We are aware of no evidence to suggest that such groups have been anything other than productive when the commission has used them.

CP submits that the existing paragraph 7 should be retained.

4. CP supports the retention of the remaining parts of section “4 – Electrical efficiency” and section “5 – Renewable energy”. CP acknowledges government’s wish to review the NZ Energy Strategy and the NZ Energy Efficiency and Conservation Strategy. However, we believe that it is important for the industry and the commission to continue to pursue energy efficiency and renewable generation while these reviews are under way.
5. CP strongly supports the insertion of paragraphs 87 and 88 simplifying approval for Transpower projects below \$20m.

Yours faithfully

Bob Lack
Commercial Manager

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