

Tuesday, 3 December 2013

Electricity Authority  
P O Box 10041  
Wellington  
By email: [carl.hansen@ea.govt.nz](mailto:carl.hansen@ea.govt.nz)

Attention: Carl Hansen

**Re: ACOT working paper – Request for extension for submissions**

Dear Carl

Pioneer is surprised by, and did not anticipate, the Electricity Authority's (Authority) conclusion in this working paper – that the payments made by distributors to distributed generation in compliance with Schedule 6.4 of the Code are estimated by the Authority to be an economic cost to consumers.

The paper also has numerous assumptions, calculations and conclusions that Pioneer, and other distributed generators, must have sufficient time to analyse and comment on given the potential material adverse impact on our business.

Pioneer does not have a dedicated regulatory resource and, given the time of year, it would not be possible to give the working paper the attention it warrants within the Authority's timeframes without the normal operation of our business being neglected.

Pioneer requests that the submission due date relating to this working paper be extended to 3 March 2014 to enable due consideration and high quality responses from affected parties.

In our view an extension in submission due date on this working paper is unlikely to impact the Authority's timeframes for the review of the allocation of Transpower's maximum allowable revenue to participants that are connected to the transmission grid. Further, Pioneer submits that the analysis undertaken by the Authority in this working paper is more relevant to a review of Schedule 6.4 of the Code. It would be much more efficient for all concerned if the Authority could publish the purpose and other details of a review it hints at in paragraph 12.3 before submissions are due on this working paper.

Yours Faithfully,



Fraser Jonker  
**Chief Executive**  
Email: [jfj@pioneer-gen.co.nz](mailto:jfj@pioneer-gen.co.nz)