

From: Sam Fleming
To: Doug Watt
Cc: Jason Woolley
Subject: RE: [EXTERNAL] Information request: Meridian
Date: Wednesday, 23 June 2021 4:41:49 pm
Attachments: [image002.png](#)
[image003.jpg](#)

Hi Doug

We've discussed this request with our CFO and members of his team. Given you have asked for commercially sensitive financial information that is not in our audited reporting, we are not comfortable providing it voluntarily.

We'll continue collecting the information so that if you decide to use the Authority's powers under s46, we do not cause any delay. However, if you decide to go down the s46 route, please be aware that key personnel are tied up with month and year-end processes so we are unlikely to have the information collected by 30 June and would appreciate you allowing a longer period.

You should also be aware that:

- We do not use ANZSIC codes to differentiate between residential and SME customers and C&I customers. Therefore any information we provide would be per our own internal segment definitions. While the difference is not likely to be much, our information may not be perfectly comparable to that of other companies who use ANZSIC codes to define market segments.
- We will need to make some significant assumptions about the allocation of OPEX between retail and generation and wholesale activities.
- In general, it's not clear to us how retail segment information at this level of granularity helps you to understand "competition in the spot market". The 2011 document you sent doesn't seem to consider segment indicators of profitability, surely profitability is a group wide measure? Any further background you can provide on how segment information relates to the review would be appreciated.

Give me a bell if you'd like to discuss any of this.

Kind regards

Sam Fleming (he/him) – Manager Regulatory and Government Relations

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M. S9(2)(a)



From: Jason Woolley S9(2)(a)
Sent: Wednesday, 16 June 2021 10:21 am

To: S9(2)(a); Sam Fleming
S9(2)(a)
Subject: Fwd: [EXTERNAL] Information request: Meridian

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From: Doug Watt S9(2)(a)
Sent: Wednesday, June 16, 2021 10:19 AM
To: Jason Woolley
Subject: [EXTERNAL] Information request: Meridian

Dear Jason

As you may be aware the Authority is conducting a review of competition in the spot market. The Review is based on the competition information paper available here.

<https://www.ea.govt.nz/monitoring/market-performance-and-analysis/what-we-monitor-in-the-industry-and-market/>

Part of measuring the performance of the spot market is to understand profit (see table three in the information paper).

To this end the Authority has been using public data to understand profitability in the five largest gentailers.

We have done as much as we can with the data that is publicly available and we still have questions about the sources of changes to profit. We are therefore requesting that the information in the attached spreadsheet be provided.

The spreadsheet contains specific technical guidance for those providing the data.

We think what we have asked for is able to be provided from the same systems that prepare the public data.

If you can provide this data by 30 June 2021 we would appreciate it.

If you have any questions regarding this request please contact me.

If your technical people have technical questions I can put them in touch with someone that can answer their questions.

If for any reason you are unwilling or unable to provide this information, then if you can let me know ASAP please.

Regards

Doug

☐ **Doug Watt**
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