

**From:** Lizzy Wiessing <Lizzy.Wiessing@simpsongrierson.com>  
**Sent:** Wednesday, 7 March 2018 9:11 AM  
**To:** Amy Helm <amy@tenpoint.co.nz>  
**Cc:** Dave Humm <Dave.Humm@gw.govt.nz>; Luke Troy <Luke.Troy@gw.govt.nz>; Helen Gilbert <hgconsulting@outlook.co.nz>; Mark Ford <Mark.Ford@gw.govt.nz>  
**Subject:** RE: Greater Wellington Revenue and Financing Policy Statement of Proposal for Review [SG-SGDMS.FID880435]

Hi all,

And here are our comments on the report to Council adopting the RFP SOP.

Regards  
Lizzy

**Lizzy Wiessing | Senior Associate | Simpson Grierson**

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**From:** Lizzy Wiessing  
**Sent:** Tuesday, 6 March 2018 4:42 pm  
**To:** 'Amy Helm'  
**Cc:** Dave Humm ; Luke Troy ; Helen Gilbert ; Mark Ford ; Jonathan Salter  
**Subject:** RE: Greater Wellington Revenue and Financing Policy Statement of Proposal for Review [SG-SGDMS.FID880435]

Hi all,

We have reviewed the draft SOP against the requirements of sections 82A and 87 of the LGA (we have considered section 87 because the Council is proposing to consult on the policy using the SCP). Although the Council has chosen to use the SCP it is required to comply with section 82, and therefore section 82A. This means the SOP needs to be clear that the whole policy is being consulted on and that the SOP spells out the changes from the current RFP in terms which satisfy section 82A(2)(a) and (b).

Overall, the document meets the requirements of describing the proposal, the reason for the proposal, and analysis of the reasonably practicable options, and manages to communicate it clearly, so well done on that. The RFP itself should be attached to the SOP, and there should be more cross-references to relevant pages in the RFP.

The SOP is quite long for an SOP and includes some information not strictly required (while it is well written, it requires a serious time commitment to get through it and digest it). We strongly suggest that it be considered whether the current draft can be split into the SOP (which contains the information to meet statutory compliance) and supporting information (which contains the rest), or at the very least, an executive summary that meets statutory compliance and the rest.

Upfront, we consider you need to explicitly explain why the Council is focussing on fairness and transparency, and what you mean by these. Fairness seems to be described in “why the proposed changes” as being about benefits. The explanation of why could be to the effect of “in considering how we fund PT and flood protection we considered the factors in section 101(3)(a) and the Council has chosen to advance proposals that particularly give weight to achieving fair and transparent funding decisions”. The rest of the references in the policy can then be made with reference to this introductory framing.

Towards the end, the examples of rating impact – this is LTP CD stuff, not RFP SOP stuff, and we suggest it be taken out. Given the complexity of the proposed changes, we are comfortable with the examples of impact that are included before page 18.

Please call if you have any queries.

Regards  
Lizzy

**Lizzy Wiessing | Senior Associate | Simpson Grierson**

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**From:** Amy Helm [<mailto:amy@tenpoint.co.nz>]  
**Sent:** Sunday, 4 March 2018 9:48 pm  
**To:** Lizzy Wiessing <[Lizzy.Wiessing@simpsongrierson.com](mailto:Lizzy.Wiessing@simpsongrierson.com)>  
**Cc:** Dave Humm <[Dave.Humm@gw.govt.nz](mailto:Dave.Humm@gw.govt.nz)>; Luke Troy <[luke.troy@gw.govt.nz](mailto:luke.troy@gw.govt.nz)>; Helen Gilbert <[hgconsulting@outlook.co.nz](mailto:hgconsulting@outlook.co.nz)>; Mark Ford <[Mark.Ford@gw.govt.nz](mailto:Mark.Ford@gw.govt.nz)>  
**Subject:** Fwd: Greater Wellington Revenue and Financing Policy Statement of Proposal for Review

Kia ora Lizzy,

Please find attached a revised version of the Statement of Proposal.  
You will find some specific questions noted in the comments.

Regards,  
Amy

**From:** Amy Helm <[amy@tenpoint.co.nz](mailto:amy@tenpoint.co.nz)>  
**Subject:** Greater Wellington Revenue and Financing Policy Statement of Proposal for Review  
**Date:** 2 March 2018 at 3:47:34 PM NZDT  
**To:** Lizzy Wiessing <[Lizzy.Wiessing@simpsongrierson.com](mailto:Lizzy.Wiessing@simpsongrierson.com)>  
**Cc:** Dave Humm <[Dave.Humm@gw.govt.nz](mailto:Dave.Humm@gw.govt.nz)>, Helen Gilbert <[hgconsulting@outlook.co.nz](mailto:hgconsulting@outlook.co.nz)>

Kia ora,

I believe you've spoken to Helen Gilbert and Dave Humm and are expecting a new version of the SoP for review.

The version attached has some gaps, where we are awaiting the outputs of modelling work. This is being finalised over the weekend. We will have a revised version to you first thing Monday morning.

In the meantime, could you please have a quick look over the attached document for any red flags you suggest we do further work to remedy over the weekend?

Apologies for the lack of formatting.

Have a good weekend,

Kind regards,

Amy

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