

Format for submissions

Register content codes - 2017 operational review consultation paper
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Question	Comment
Q1. Do you agree the issues identified by the Authority are worthy of attention? If not, please explain why.	Yes
Q2. Do you agree that the proposed business requirements around period of availability and distributor's pricing information will support accurate application of register content codes and periods of availability for ICP based volume prices? If not, please explain.	Q2 We do not agree the business requirements will support accurate applications of register content codes and periods of availability for ICP based volume prices. The requirements have identified the problem that the codes don't support meters with both timed registers and a controlled element. The proposed option supports removing the timed period and replacing with the controlled period. We believe this will lead to more confusion and inaccuracies than we currently have. From a MEP point of view the timed tariffs and hours of availability are relatively easy to manage particularly with AMI meters as the meters are programmed to suit the codes on the registry. The program identifier is used to, populate the registry and supply the associated meter reads to retailers.

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	<p>These should remain on the registry. We believe a better option would be for the controlled period of the meter to sit at relay level where there are a number of fields on the registry not in use. The IN or CN codes and hours of availability could be added to these fields or a referral to the Network control times similar to the proposed timed tariffs.</p> <p>This could also allow for relays with no serial number or the relay in the meter by either having the serial number blank or populating with the same serial number as the meter.</p> <p>i.e. A 2 rate meter would have</p> <p>Meter Timed Tariff Meter Serial Number Reg 1 D16 Reg 2 N8</p> <p>Relay Network Control Period Relay Serial number Meter serial number Register content code IN Period Availability 17 or Network code</p>
<p>Q3. Do you agree with the Authority's preferred Option D which introduces generic register content codes for mass market TOU prices, and for consistency deletes existing customised codes that specify time blocks in the descriptions?</p> <p>If not, which option do you prefer and why?</p>	<p>No as per Q2</p>
<p>Q4. If the Authority implements Option D, we propose to allow participants 6 months to convert from using the customised register content codes to the corresponding generic register</p>	<p>No</p> <p>System change and cost development time is unknown but we would estimate 6 months development and 3 to 6 months</p>

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<p>content codes (mapping demonstrated in Appendix C). Would this be sufficient time? If not, please advise how much time would be reasonable.</p>	<p>deployment.</p>
<p>Q5. Do you agree that the Authority should progress a Code change to mandate that a distributor's pricing information must contain certain information to assist consistent and correct application of register content codes and periods of availability for ICP based volume prices? If not, please explain why.</p>	<p>Yes Distributor load control times are difficult to obtain.</p>
<p>Q6. Do you agree with the objectives of the proposed amendments? If not, why not?</p>	<p>On the whole yes. However cost is being driven into the industry.</p>
<p>Q7. Do you agree the benefits of the proposed amendments outweigh the costs? If not, please explain your reasons.</p>	<p>Cost benefit is focused on retailers. Costs as an MEP will be difficult to recover as any price increase to retailers through increased lease fees could result in displacement of equipment.</p>
<p>Q8. Do you agree the proposed amendments are preferable to other options? If you disagree, please give reasons.</p>	<p>Disagree See Q2</p>