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## Response to Consultation Paper – Register Content Codes Operational Review

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Thank you for this opportunity to provide comments on the Register Content Codes Operational Review.

We consider that with the advancement of emerging technology Register Content Codes may need to change to encourage the right settings. Consistent with previous advice, Genesis will continue to push for enabling settings rather than restrictive codes. Detailed responses to specific questions are provided in Appendix A.

If you would like to discuss any of these matters further, please contact me by email: [mariota.smutz@genesisenergy.co.nz](mailto:mariota.smutz@genesisenergy.co.nz) or by phone: 09 951 9137.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "M. Smutz".

Mariota Smutz  
**Group Manager – Policy and Regulation**

## Appendix A: Responses to Consultation Questions

Question	Comment
<p>Q1. Do you agree the issues identified by the Authority are worthy of attention? If not, please explain why.</p>	<p>We believe there is another approach that the Authority should give its full consideration.</p> <p>At some point the industry will have to accept that the Registry as a record of the actual physical attributes (i.e. not virtual registers) of an ICP will no longer be able to (nor should need to) reflect how a participant may decide to treat the output from the physical configurations in their customer interactions.</p> <p>If the desire to push data based innovation of products is real, then the encouragement should be to use base data within participant systems rather than retro fitting legacy systems and processes to accommodate.</p>
<p>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.</p>	<p>No, the changes appear to be adding additional complexity for no real end user benefit. There is minimal operational advantage gained in indicating that a weekday register contains consumption for 10 hours through the POA field that is not intrinsic via the Register Content 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? If not, which option do you prefer and why?</p>	<p>No, we support Option A, status quo.</p> <p>We do not see sufficient end user benefit offsetting the cost of implementing these changes. The only change we would support is the replacement of the customised time of use codes with generic ones.</p>
<p>Q4. If the Authority implements Option D, we propose to allow participants 6</p>	<p>Yes, but be aware that these changes will need a two-stage approach to</p>

Question	Comment
<p>months to convert from using the customised register content codes to the corresponding generic register content codes (mapping demonstrated in Appendix C).</p> <p>Would this be sufficient time?</p> <p>If not, please advise how much time would be reasonable.</p>	<p>complete. The 'changed' codes will need to be included from the inception date and run in parallel with existing codes to allow for network wash ups to occur. After the full wash up cycle (up to 12 months depending on network) the old codes will need to be removed/hidden to prevent accidental use.</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?</p> <p>If not, please explain why.</p>	<p>No, this is regulatory creep into an area that is between the distributor and trader to resolve if there is a lack of understanding. Regulating in this area risks distributors tailoring price constructs to fit with regulations rather than needs of the customer.</p>
<p>Q6. Do you agree with the objectives of the proposed amendments?</p> <p>If not, why not?</p>	<p>Yes, other than:</p> <ul style="list-style-type: none"> <li>- our comments above around an alternative approach,</li> <li>- Item (g). Register content codes are not a hindrance in creating differentiated customer pricing, and differentiated customer product offerings are not restricted to be being solely of a time of use nature.</li> </ul>
<p>Q7. Do you agree the benefits of the proposed amendments outweigh the costs?</p> <p>If not, please explain your reasons.</p>	<p>No, from our perspective the costs are understated and more than minor. The amount of integration of Register Content Codes into billing/network normalised and reconciliation systems appears to be underestimated.</p> <p>As noted above, change in Register Content Code functionality will not provide a benefit in increased competition, nor could avoidance of</p>

Question	Comment
	future change costs be claimed as we can't foresee what changes will be needed to the Registry as the industry changes.
Q8. Do you agree the proposed amendments are preferable to other options? If you disagree, please give reasons.	All proposed amendments appear to be refinements of the existing paradigm without any challenging thinking of what the future may look like.