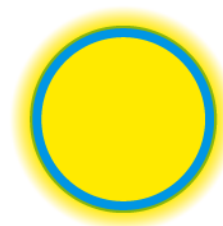


29 September 2017

Submissions  
Electricity Authority  
2 Hunter Street  
Wellington  
[via email]

By email: [submissions@ea.govt.nz](mailto:submissions@ea.govt.nz)

**POWERCO**



### **Operational review of register content codes**

Powerco welcomes the opportunity to comment on the Electricity Authority's 2017 operational review of register content codes issued on 7 August 2017.

#### **General comments:**

- We support the review of register content codes to address the implications of distribution tariff reform and improve their clarity.
- We support the Authority's preference for option D.

Appendix A contains responses to the consultation questions. If you wish to discuss our submission please contact Andrew Kerr ([andrew.kerr@powerco.co.nz](mailto:andrew.kerr@powerco.co.nz)).

Yours sincerely

A handwritten signature in black ink, appearing to read 'Richard Fletcher', is written over a light grey horizontal line.

Richard Fletcher  
General Manager Commercial and Regulatory

## Appendix A: Responses to consultation questions

Question	Comment
Q1. Do you agree the issues identified by the Authority are worthy of attention?	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.	Yes. Mandating the register contents codes would obligate distributors to capture all possible register content codes against the single tariff code substantively increasing the size and complexity of the file.  We propose that the business requirement is amended so that the requirement stipulates that only the most prevalent register content code is captured against the tariff code in the EIEP12 file.
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?	Yes.  Paragraph 2.61(d) describes how option D would involve "MEPs and traders having to interpret the time blocks and period of availability from the distributor's pricing information". We suggest in addition to <i>interpreting</i> , these parties <i>accurately apply</i> the time blocks.
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 content codes (mapping demonstrated in Appendix C).	Yes, we expect so.
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?	Yes.  It's important that the metering information in the registry accurately reflect metering physical connection to the network from a load control management and network billing perspective.
Q6. Do you agree with the objectives of the proposed amendments?	Yes.
Q7. Do you agree the benefits of the proposed amendments outweigh the costs?	Yes (qualitative assessment).
Q8. Do you agree the proposed amendments are preferable to other options? If you disagree, please give reasons.	Yes