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29 September 2017

John Rampton
General Manager Market Design
Electricity Authority

By email: submissions@ea.govt.nz

Dear John

Operational Review Registry Content

We appreciate the opportunity to submit to the Authority's consultation on its *operational review of the Registry content codes (RCC)* published 7 August 2017. We consider the review is timely to ensure registry codes are fit for purpose for evolving pricing structures.¹

We support the Authority's proposal under option D to introduce generic codes and remove customised codes. We consider distributors are best placed to submit on the likely costs and time of the conversion of existing information to new information required by the option.

The Authority describes the role of the codes to "identify the type of information being recorded by a channel (previously referred to as a register) on a metering component."² (emphasis added). We have reviewed the list of codes in Appendix D (under Option D) and consider the list contains codes that do not identify the type of information.

For example, the existing interval meter registry codes describe the recording interval and the unit of measure, and not the type of consumption. The interval meter 730x codes only tell how information is being recorded and not the type of load. The accumulator type might be a better way to tell how information is recorded or a new field should be added to each channel record.

Similarly, the interval codes xxx2, xxx4, and xxx6 relate to the unit of measure. However, the registry functional specification already has a separate field to record unit measure so including the information as a registry code is unnecessary.

The list may need to be reviewed again to ensure the codes only refer to the type of consumption recorded in the channel. Otherwise the potential for duplication of information and inconsistent field-filling remains if parties face different places to input their data.

Yours sincerely

Catherine Jones
Regulatory Affairs and Pricing Manager

¹ The Authority identifies at section 2.8 "While this consultation paper is looking at all options for register content codes, the focus is primarily on register content codes and period of availability values for mass market TOU prices which...appear at this point to be preferred over the other pricing types."

² Page 3. Types are uncontrolled, controlled e.g. water heating; or composite (both controlled and uncontrolled).