29 September 2017

Submissions
Electricity Authority
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UNISON SUBMISSION – REGISTER CONTENT CODES: 2017 OPERATIONAL REVIEW

Unison welcomes the opportunity to provide a submission to the Electricity Authority (Authority) on the consultation paper, *Register Content Codes: 2017 Operational Review.*

Unison is supportive of the Authority's preferred approach – Option D – as described in the consultation paper. However, we submit the Authority needs to take care to ensure that Register Content Codes are set in a way that is meaningful and supports innovation in pricing. Unison made this point in a recent submission to the Authority in response to the EIEP Review:

> *"Unison considers that register content codes based on type of channel and time blocks (rather than based on physical meter configuration) do not add value in an environment where half hour data can be used to provide appropriately time-blocked data in EIEP1 format. These "customised register content codes" are resulting in further proliferation in the available register content codes – which is one of the main sources of incorrect price option selection. It also potentially limits innovation in pricing as pricing becomes associated with approved register content codes only, and obtaining approval for new codes is difficult and time consuming."[1]*

With regards to implementation, Unison recommends that the Authority align the implementation of any changes to the Register Content Codes to the annual distribution price consultation and notification. Given that this consultation process is not yet complete, it is unlikely this could be implemented in time for price notifications for 1 April 2018. Therefore, we submit that Option D is implemented prior to the pricing consultation and notification for pricing effective from 1 April 2019, in approximately 18 months' time. This could include a transition period to enable MEPs to update registry information and retailers to commence preparations for mapping of distributor pricing based on the new Register Content Codes.

We also wish to submit that given the importance of Register Content Codes for meter installations, market submissions, customer invoicing and network reporting (as noted by the Authority in the consultation), a Registry Report should be made available for distributors and other participants to extract Register Content Codes associated with all ICPs in its new network balancing areas. This would assist distributors with distribution pricing development, pricing

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[1] Unison (22 September 2017). Submission to the Electricity Authority: Operational Review of Electricity Information Exchange Protocols (EIEPs).

mapping table development as well as improving assurance for network reporting and invoicing. We note that the recently added report *Meter Installation Information* may contain the relevant information. However, we encourage the Authority to provide guidance regarding the access and use of Register Content Code information contained in the Registry.

Unison's responses to the Authority's consultation questions are attached to this letter. For any questions on the points raised in this submission, please Roanna Vining, Regulatory Affairs Analyst, by phone (06) 873 9329 or email Roanna.Vining@unison.co.nz.

Yours sincerely

Nathan Strong

GENERAL MANAGER, BUSINESS ASSURANCE

Attached: Appendix One – Unison Response to Consultation Questions

Appendix One: Unison Response to Consultation Questions

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.	Yes
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
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). Would this be sufficient time? If not, please advise how much time would be reasonable.	Unison suggests that the timing of the implementation should align with the annual distribution price consultation and notification. Given that this consultation process is not yet complete, we doubt that this could be implemented in time for price notifications for 1 April 2018. Therefore, we submit that Option D is implemented prior to the pricing consultation and notification for pricing effective from 1 April 2019. This could include a transition period whereby Distributors publish a provisional mapping table to coincide with the new Register Content Codes becoming effective six months in advance of the commencement of the 2019 pricing year on 1 April 2019. MEs would then have a period of six months to update and align Register Content Codes including registry information with the new requirements. Retailers would also be able to commence preparations for mapping distributor pricing to the new Register Content Codes.

Question	Comment
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.	Yes
Q6. Do you agree with the objectives of the proposed amendments? If not, why not?	Yes
Q7. Do you agree the benefits of the proposed amendments outweigh the costs? If not, please explain your reasons.	Yes
Q8. Do you agree the proposed amendments are preferable to other options? If you disagree, please give reasons.	Yes