

## Format for submissions

<b>Register content codes - 2017 operational review consultation paper</b>
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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.	Yes. However, Metrix suggests that POAs should also be able to be defined by those controlling them, i.e. the distributor. MEPs should present what is physically on site to the Registry, such as the relay channel number; the distributors can use this information to advise the POA they wish to implement for their control capability.
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?	Option D is a good start, with the best outcome for the least impact. Metrix is concerned around the growing number of RCCs, which is making the codes more complicated and difficult to implement.  Metrix suggests considering an alternative option, described in Q8, which accommodates multiple fields to describe the channel as opposed to long and complicated RCC codes.
Q4. If the Authority implements Option D, we propose to allow participants 6 months to convert from using the customised	6 months is sufficient to implement the expected changes for Option D as there are limited changes to the current system.

Question	Comment
<p>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>However, 9-12 months might be a more reasonable timeframe, especially if participants are undergoing major system upgrades or programmes of work.</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>Yes.</p>
<p>Q6. Do you agree with the objectives of the proposed amendments?</p> <p>If not, why not?</p>	<p>Yes, Metrix sees the proposed amendments as an improvement to the current protocol that must be made. That being said, Metrix would like the EA to consider a more scalable solution for RCCs to allow for greater complexity that will likely be required in the future.</p>
<p>Q7. Do you agree the benefits of the proposed amendments outweigh the costs?</p> <p>If not, please explain your reasons.</p>	<p>Yes. Option D will incur minimal cost to implement and will reduce the ongoing costs associated with enabling the increasing complexity in distribution and retailer pricing.</p>
<p>Q8. Do you agree the proposed amendments are preferable to other options? If you disagree, please give reasons.</p>	<p>Option D is the preferred of the options proposed by the EA. However, Metrix is concerned with the scalability of this approach and that the RCC continues to incorporate attributes that are outside the physical metering configuration, and hence outside the control of the MEP. Metrix's view is the representation of network control periods or retailer pricing mechanisms/settlement on the Registry should be the responsibility of the network/retailer.</p> <p>Therefore, Metrix proposes an alternative approach which replaces the current RCCs and POA, instead providing fields for the MEP to describe the physical configuration of the meter only. Current fields around the unit of measure, energy flow direction and accumulator</p>

Question	Comment
	<p>type<sup>1</sup> would remain from the present process. Proposed examples of how common fields would appear are provided in Appendix A;</p> <ul style="list-style-type: none"> <li>• Channel type identifier – UN / IN / CN</li> <li>• Control Device Channel – [Based off site relay control – giving POA responsibility to the distributors]</li> <li>• Applicable Season – Summer / Winter / All Year</li> <li>• Applicable Day – Weekday / Other day / All</li> <li>• Applicable time of day –Peak / Off Peak / Shoulder / Day / Night / All [multiple options if required]</li> </ul> <p>These fields would allow a simple description of the metering configuration. Changing the representation of the POA to be maintained by the network supports innovation and greater complexity for network and retailer pricing. Metrix also recommends that emergency load control should be defined by the network participant, not via the RCC.</p> <p>Utilising these metering description fields will make the Registry reconciliations more manageable for MEPS, as opposed to keeping a code breaker on hand to define each RCC. Some examples of existing configurations in the proposed format are included below: Although this is a significant change to implement initially; there should be little requirement for change going forward.</p> <p><sup>1</sup> If accumulator = A, the time period must be defined</p>

## Appendix A

RCC Code	Current RCC Representation		Proposed RCC Alternative	
CN Controlled	Channel Number	1	Channel Number	1
	Number of Dials	8	Channel Type Identifier	CN
	Register Content Code	CN	Control Device Channel	110+51
	Period of Availability	8	Applicable Season	All Year
	Unit of Measurement	kWh	Applicable Day	All
	Energy Flow Direction	X	Applicable Time of Day	All
	Accumulator Type	C	Unit of Measurement	kWh
	Settlement Indicator	Y	Energy Flow Direction	X
	Event Reading	0	Accumulator Type	C
IN Inclusive	Channel Number	1	Channel Number	1
	Number of Dials	8	Channel Type Identifier	IN
	Register Content Code	IN	Control Device Channel	100+01
	Period of Availability	19	Applicable Season	All Year
	Unit of Measurement	kWh	Applicable Day	All
	Energy Flow Direction	X	Applicable Time of Day	All
	Accumulator Type	C	Unit of Measurement	kWh
	Settlement Indicator	Y	Energy Flow Direction	X
	Event Reading	0	Accumulator Type	C

EG Embedded Generation	Channel Number	1	Channel Number	1
	Number of Dials	8	Channel Type Identifier	UN
	Register Content Code	EG	Control Device Channel	-
	Period of Availability	24	Applicable Season	All Year
	Unit of Measurement	kWh	Applicable Day	All
	Energy Flow Direction	I	Applicable Time of Day	All
	Accumulator Type	C	Unit of Measurement	kWh
	Settlement Indicator	Y	Energy Flow Direction	I
	Event Reading	0	Accumulator Type	C
WDD Weekday Day	Channel Number	1	Channel Number	1
	Number of Dials	8	Channel Type Identifier	UN
	Register Content Code	WDD	Control Device Channel	-
	Period of Availability	16	Applicable Season	All Year
	Unit of Measurement	kWh	Applicable Day	Weekday
	Energy Flow Direction	X	Applicable Time of Day	Day
	Accumulator Type	C	Unit of Measurement	kWh
	Settlement Indicator	Y	Energy Flow Direction	X
	Event Reading	0	Accumulator Type	C

WEPK Weekend Peak	Channel Number	1	Channel Number	1
	Number of Dials	8	Channel Type Identifier	UN
	Register Content Code	WEPK	Control Device Channel	-
	Period of Availability	15	Applicable Season	All Year
	Unit of Measurement	kWh	Applicable Day	Other day
	Energy Flow Direction	X	Applicable Time of Day	Peak
	Accumulator Type	C	Unit of Measurement	kWh
	Settlement Indicator	Y	Energy Flow Direction	X
	Event Reading	0	Accumulator Type	C
SRWDN Summer Weekday Night	Channel Number	1	Channel Number	1
	Number of Dials	8	Channel Type Identifier	UN
	Register Content Code	SRWDN	Control Device Channel	-
	Period of Availability	8	Applicable Season	Summer
	Unit of Measurement	kWh	Applicable Day	Weekday
	Energy Flow Direction	X	Applicable Time of Day	Night
	Accumulator Type	C	Unit of Measurement	kWh
	Settlement Indicator	Y	Energy Flow Direction	X
	Event Reading	0	Accumulator Type	C

7304	Channel Number	1	Channel Number	1
	Number of Dials	8	Channel Type Identifier	UN
	Register Content Code	7304	Control Device Channel	-
	Period of Availability	24	Applicable Season	All Year
	Unit of Measurement	kWh	Applicable Day	All
	Energy Flow Direction	X	Applicable Time of Day	All
	Accumulator Type	A	Unit of Measurement	kWh
	Settlement Indicator	N	Energy Flow Direction	X
Event Reading	0	Accumulator Type	A	
		Time Period**	30 minutes	

\*\* Time Period field applies only when Accumulator Type = A