

29 September 2017

Submissions
Electricity Authority
PO Box 10041
Wellington 6143.

By email to submissions@ea.govt.nz

Re: Consultation Paper – Register content codes operational review

Dear Electricity Authority

The ENA is appreciative of the opportunity to submit on the Electricity Authority consultation paper on the operational review of the register content codes.

It is our understanding that this review was established to attend to a number of major issues that have resulted from the implementation of Part 10 of the Electricity Industry participation code, rather than in response to a defined problem. ENA members view the review as much more than a 'timely tidy up' of a backlog of issues that can be observed in the Authority's approach to the EIEP review, but rather is a fundamental rebuild of the registry codes.

On reflection, ENA members agree that the introduction of Part 10 of the Code was challenging for the industry and resulted in unsatisfactory outcomes over time with both billing and price change processes. Members agree that a simple tidy up of these matters is a good idea and are supportive of the Authority progressing such a review, but they consider that the output from the review is far too complex and will likely make the unsatisfactory situation with the current registry codes even worse.

Our submission takes the form of a letter because we were unable to simplify the complexities in the consultation paper, despite it only including 8 specific questions. Individual ENA members may provide specific feedback to the Authority on some or all of those questions.

EDB's are however acutely aware that because the electricity sector is undergoing quite some change, current markets need to adapt to these changes, and that EDB's also need to be aware of and respond as the changes progress.

ENA members do however support the Authority effort to restructure the register content codes, align them with the developments in industry standardisation and therefore make them fit for purpose in 2017.

Yours sincerely

A handwritten signature in grey ink, appearing to be 'D. de Boer', written in a cursive style.

David de Boer

Principal Advisor