

From: [Bruce Palmer](#)
To: [Distribution Feedback](#)
Subject: Re: Proposed minor changes to Registry, responses before 5pm 26 September 2023 #2
Date: Thursday, 31 August 2023 6:43:49 pm

Dear Folks

I realised there was a better example for Address Property Names after sending my first response.

The following is based on a real situation, but has been changed for privacy. It is a large back-country farming venture, with one common driveway/access from a state highway. Waka Kotahi restrict access to one driveway per venture, so all ICPs here have the same street address.

On the property there can be found:

- 2 homesteads
- 6 workers cottages
- 2 dairy sheds
- 2 dairy waste ponds
- 4 barns, workshops and implement sheds
- 4 pivot irrigators
- 2 EV charge stations for farm vehicles are to come.

In the absence of property name, all ICPs are identified by their street address. The numbers have been anonymised for privacy, but in effect...

Unit	Number	Street	Suburb	Town	Region
	BNS 1234	State Highway 8	Twizel	Twizel	Timaru & Oamaru
	BNS 1234-1	State Highway 8	Twizel	Twizel	Timaru & Oamaru
	BNS 1234-2	State Highway 8	Twizel	Twizel	Timaru & Oamaru
	BNS 1234-3	State Highway 8	Twizel	Twizel	Timaru & Oamaru
	BNS 1234-4	State Highway 8	Twizel	Twizel	Timaru & Oamaru
	BNS 1234-5	State Highway 8	Twizel	Twizel	Timaru & Oamaru
	BNS 1234-6	State Highway 8	Twizel	Twizel	Timaru & Oamaru
	BNS 1234-7	State Highway 8	Twizel	Twizel	Timaru & Oamaru
	BNS 1234-8	State Highway 8	Twizel	Twizel	Timaru & Oamaru
	BNS 1234-9	State Highway 8	Twizel	Twizel	Timaru & Oamaru
	BNS 1234-10	State Highway 8	Twizel	Twizel	Timaru & Oamaru
	BNS 1234-11	State Highway 8	Twizel	Twizel	Timaru & Oamaru
	BNS 1234-12	State Highway 8	Twizel	Twizel	Timaru & Oamaru
	BNS 1234-13	State Highway 8	Twizel	Twizel	Timaru & Oamaru
	BNS 1234-14	State Highway 8	Twizel	Twizel	Timaru & Oamaru
	BNS 1234-15	State Highway 8	Twizel	Twizel	Timaru & Oamaru
	BNS 1234-16	State Highway 8	Twizel	Twizel	Timaru & Oamaru
	BNS 1234-17	State Highway 8	Twizel	Twizel	Timaru & Oamaru
	BNS 1234-18	State Highway 8	Twizel	Twizel	Timaru & Oamaru
	BNS 1234-19	State Highway 8	Twizel	Twizel	Timaru & Oamaru
	BNS 1234-20	State Highway 8	Twizel	Twizel	Timaru & Oamaru

Someone is seeking the ICP at BNZ 1234-8. Its meter location is described as “front wall”. Good luck.

I know the property names, I know which is which. Why is there a desire to remove the ability to put this in Registry?

Regards
Bruce Palmer

From: [Bruce Palmer](#)
To: [Distribution Feedback](#)
Subject: Re: Proposed minor changes to Registry, responses before 5pm 26 September 2023 #3
Date: Thursday, 14 September 2023 11:15:14 am

Hi Folks

There is nothing confidential in here.

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I have been thinking longer about Address Property Name, and compliance with clause 2(1) of Schedule 11.1 "*Each ICP identifier must have a location address that allows the ICP to be readily located.*" I have previously provided a set of example addresses, each unique, each valid in today's Registry, but with dubious compliance with Clause 2(1).

| Unit | Number      | Street          | Suburb | Town   | Region          |
|------|-------------|-----------------|--------|--------|-----------------|
|      | BNS 1234    | State Highway 8 | Twizel | Twizel | Timaru & Oamaru |
|      | BNS 1234-1  | State Highway 8 | Twizel | Twizel | Timaru & Oamaru |
|      | BNS 1234-2  | State Highway 8 | Twizel | Twizel | Timaru & Oamaru |
|      | BNS 1234-3  | State Highway 8 | Twizel | Twizel | Timaru & Oamaru |
|      | BNS 1234-4  | State Highway 8 | Twizel | Twizel | Timaru & Oamaru |
|      | BNS 1234-5  | State Highway 8 | Twizel | Twizel | Timaru & Oamaru |
|      | BNS 1234-6  | State Highway 8 | Twizel | Twizel | Timaru & Oamaru |
|      | BNS 1234-7  | State Highway 8 | Twizel | Twizel | Timaru & Oamaru |
|      | BNS 1234-8  | State Highway 8 | Twizel | Twizel | Timaru & Oamaru |
|      | BNS 1234-9  | State Highway 8 | Twizel | Twizel | Timaru & Oamaru |
|      | BNS 1234-10 | State Highway 8 | Twizel | Twizel | Timaru & Oamaru |
|      | BNS 1234-11 | State Highway 8 | Twizel | Twizel | Timaru & Oamaru |
|      | BNS 1234-12 | State Highway 8 | Twizel | Twizel | Timaru & Oamaru |
|      | BNS 1234-13 | State Highway 8 | Twizel | Twizel | Timaru & Oamaru |
|      | BNS 1234-14 | State Highway 8 | Twizel | Twizel | Timaru & Oamaru |
|      | BNS 1234-15 | State Highway 8 | Twizel | Twizel | Timaru & Oamaru |
|      | BNS 1234-16 | State Highway 8 | Twizel | Twizel | Timaru & Oamaru |
|      | BNS 1234-17 | State Highway 8 | Twizel | Twizel | Timaru & Oamaru |
|      | BNS 1234-18 | State Highway 8 | Twizel | Twizel | Timaru & Oamaru |
|      | BNS 1234-19 | State Highway 8 | Twizel | Twizel | Timaru & Oamaru |
|      | BNS 1234-20 | State Highway 8 | Twizel | Twizel | Timaru & Oamaru |

The site is on a corner, and includes another 6 ICPs on a second street address. Here is the present real world disambiguation for these addresses from internal systems:

|                        |
|------------------------|
| Cottage 1              |
| Cottage 2              |
| House 1                |
| House 3                |
| House 4                |
| House 5                |
| House 6                |
| Centre Pivot (Area C1) |
| Centre Pivot (Area G2) |

|                                  |
|----------------------------------|
| Centre Pivot (Area J)            |
| Dairy Shed No 1                  |
| Dairy Shed No 2                  |
| Dairy Shed (Area 2E)             |
| Irrigation Pump No 1             |
| Irrigation Pump No 2             |
| Irrigation Pump No 3             |
| Irrigation Pump No 4             |
| Irrigation Pump (Area A2)        |
| Irrigation Pump (Area B)         |
| Irrigation Pump (Area C2)        |
| Irrigation Pump (Area D)         |
| Irrigation Pump (Area E)         |
| Irrigation Pump & Pivot (Area F) |
| Irrigation Pump & Pivot (Area G) |
| Workers House No 2               |
| Workshop                         |

One suggestion is to put the disambiguation into “Property Name”. This would satisfy Clause 2(1) on the basis that you only need to know exactly which pivot is which is if you attend site, and anyone attending site would need a site induction under HSE rules and during this induction, would learn where Area G was.

The only definition for Property Name I can find is in the non-regulated EIEP9 protocol "*name given to the property or building by the owner or party with legal naming rights.*"

The White House  
1600 Pennsylvania Ave NW  
Washington DC  
USA

Auckland War Memorial Museum  
Parnell 1010  
Auckland

Chateau Tongariro  
State Highway 48  
Mt Ruapehi 3951

The above illustrate valid property names. [My disambiguation list is not a list of property names.](#) But it is required to satisfy clause 2(1) as without it, the ICPs cannot be “readily located” from the street address. I could disambiguate by recording GPS coordinates in Registry for each premise or appliance, but users would then need GPS software and the land-base maps for our district, which compromises “readily locate” if not readily available.

I note that a portion of my list has been recorded by users in “installation details” as part of the Pricing section in Registry. This field is not part of the “location address” fields in Registry e.g. not included in EIEP9.

**There is a need for disambiguating ICPs, particularly where they share rural addresses, particularly on state highways where only one access point to the property is permitted, that allows Clause 2(1) to be satisfied, and which does not require rigorous adherence to a**

formal name assigned to a premise through legal naming rights.

The options seem to be:

- (i) amend Schedule 11.1 clause 2(1) to say "*Each ICP identifier must have a location address that allows the ICP to be readily located by users with the appropriate software*"; this lets me disambiguate by recording the GPS details in Registry, or
- (ii) clarify that the existing Property Name field can be used for disambiguation in circumstances where a formal named property does not exist, or
- (iii) provide a new field as part of the Address event in Registry (and EIEP9) for such disambiguation, or
- (iv) amend Schedule 11.1 2(1) to say "*Each ICP identifier must have information within Registry that allows the ICP to be readily located.*" which allows "installation details" to be brought into scope. You may need to add pricing event "installation details" to the scope of EIEP9. Note that use of pricing "Installation Details" for address disambiguation is compromised by the Code Schedule 11.1 clauses 7(1)(h), 7(1)(i) and 7(1A) which uses this field for an overflow area for pricing parameters.  
e.g.  
7(1A) For the purposes of subclause (1)(h), if the **price category** assigned to the **ICP** requires information additional to **chargeable capacity** to unambiguously define the line charges, the additional information may be contained in the **distributor** installation details field of the **registry**.

Or, in English, if a price plan is introduced that bases daily charges on both chargeable capacity and historical peak demand, we lose the ability to disambiguate our addresses.

It is looking like the Authority may be forced to relax the rules over Property Name.

Regards  
Bruce Palmer

**From:** [Bruce Palmer](#)  
**To:** [Distribution Feedback](#)  
**Subject:** Proposed minor changes to Registry, responses before 5pm 26 September 2023  
**Date:** Thursday, 31 August 2023 5:35:37 pm  
**Attachments:** [Property Name.docx](#)

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Dear Folks

Thank you for the opportunity to respond. I do not represent any particular market participant and am completely unable to make statements on anyone behalf. I am just an IT professional who is tasked with making software changes to keep up to date with what comes out of consultation exercises such as these.

## Fuel type codes

1) The Authority proposes to add three new entries to the 'fuel type' codes in the Description Table of SD-020 in the [registry functional specification](#) on page 418 these being:

'solar + battery' – solar PV generation and a battery  
'wind + battery' – wind turbine and a battery  
'standalone batt' – battery only, excludes EV batteries in a vehicle to grid configuration.

From an IT perspective I have no issue with these. I can however imagine distributors having great difficulty, because of the compliance need under the Code for information in. The Registry to be complete, consistent and reliable, and often with very short timeframes in terms of working days to make changes. I am already having a lot of difficulty in keeping up with the paperwork, with DG capacity and fuel type being defined within the Network event in Registry.

The distributor has no awareness of a consumer purchasing an EV, or installing any DG equipment, until the point the consumer wishes to connect their export to the network. At least without a battery in the process, we are able to guess the DG capacity (a compliance field) and where the consumer follows process and actually involves the EDB with the connection, then we have a chance of knowing it has happened within the compliance period. With the majority of smart meters being installed these days having latent export capability, and with 3rd party providers in charge of most, often the first we know about DG in place is export volume turning up in an EIEP1. Since this is invariably more than three days after it happened, we are on a hiding to nothing with regards to compliance.

Recording EVs as a specific source of DG becomes more problematic. They are only a source of DG charging if present and plugged in. If the occupant is on holiday for a week and takes their EV with them, they are no longer a DG site for the week - no generation capability and no fuel type. How is an EDB supposed to keep track of this - make it mandatory for every EV driver in the district to register their intention to have a holiday?

Similarly, whether an EV that is at home and available to be plugged in for DG battery export may not be plugged in; this is a consumer choice. Maybe they need an early start the following morning and do not want their car to be flat. So for that day, they voluntarily withdraw their DG capability. Or limit the capacity available,

It is one thing to come up with new classifications also that registry apparatchiks can micro-analyse where DG is coming from, but the more of these classifications are created, the harder it is for EDBs to correctly supply data and avoid non-compliance attention from EDB auditors. Particularly when it involves a process that EDBs are not allowed to be

primarily involved with: generation.

## Vehicle to Grid

2) Secondly, as vehicle to grid installations (where an electric vehicle can supply power from its battery back to the network) are increasing in New Zealand, the Authority proposes an additional change to the fuel type codes:

Change the 'electric vehicl' entry to 'elec vehicl V2G' with the following description 'electric vehicle (includes fuel cells) exporting through a vehicle-to-grid configuration'.

This is just a code change, no impact on compliance, the EDB will be just as non-compliant if not aware of EV export to grid under the new code as under the old. No objection.

## Property Name

3) Lastly, the Authority would like to add a tool tip to the 'Property Name' entry in the registry, to ensure that this field is only completed when necessary and with the correct information:

Add a tool tip to the 'Property Name' entry in the registry that says *This entry should be left blank unless it is absolutely necessary to include information to help identify the location of the ICP. In no instances should address information be added here.*

This change would assist registry users to identify the information they need in the registry. Alternatively, the Authority could delete the 'Property Name' entry altogether and we seek your views on this option.

This falls into the category of a solution looking for a problem. Property name is part of the address. For example, there is a community in the Otago region called Campbell Park, It consists of a number of residences all off a shared driveway, so all with a common street frontage. Instead of giving them flat numbers or unit numbers, each building has a name. I have attached an illustration, taken from the Registry Functional Specification, illustrating clarity that would be lost. In the absence of GPS co-ordinates (or with them but in the absence of something that tells you where you are), you are reliant on the address and the meter location code to locate the meter and through it the ICP. You may be looking for the point of isolation in an emergency. Why remove from the address field something that can help you pin down which front wall air shed etc the meter box might be on, in a large property with only one street entrance (Wake Kotaki's rules) and maybe three dozen buildings?

While on the topic of a free text addressing field being useful, have you ever tried to describe a street address for a premise accessible only by water or helicopter?

**By all means clarify guidance for where property name is used, but don't remove it.** I'd just have to add it to our internal fields (those not passed to Registry) thereby depriving other participants of the detail they may need to locate the correct ICP.

While at it, the Registry Functional Spec Appendix 2, page 538 says "[To obtain a full copy and the background of the standards please go to www.anzlic.org.au.](http://www.anzlic.org.au)". The website

has moved.

Finally I note that:

"AS/NZS 4819:2011 Rural and urban addressing was prepared by the Street Address Working Group of ICSM for the Joint Standards Australia/Standards New Zealand Committee IT-004, to supersede AS/NZS 4819:2003, Geographic Information – Rural and Urban Addressing. It was first published in November 2011.

This standard is currently under review."

Maybe it would be an idea to wait for the review to be complete before changing the use of, or removing, fields. That way the consultation would only be required once.

Regards

Bruce Palmer

IT Professional

Rodney