

**From:** [Daniel Vincent](#)  
**To:** [Distribution Feedback](#)  
**Subject:** Minor changes to the registry - Network Tasman submission  
**Date:** Tuesday, 26 September 2023 2:08:15 pm  
**Attachments:** [image001.jpg](#)  
[image002.png](#)

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Hi Allen,

Network Tasman is pleased to submit on the minor amendments to the registry proposed by the Authority. Network Tasman largely endorses the Authority's proposal. Specific comments on the proposal are set out below.

Proposed change 1: Network Tasman agrees with the first proposed change. We do, however, seek clarification about whether the generation capacity of passive inverters (in place to support batteries), and non-exporting batteries are included in the total nameplate capacity (kW) and should therefore be recorded on the Registry. Clause 7(1)(o) Schedule 11.1 of Part 11 requires the nameplate capacity of distributed generation to be recorded on the registry. The definition of "distributed generation" in Part 1 of the Code is "*distributed generation means generating plant that is connected, or that a distributed generator proposes to connect, to a distribution network or to a consumer installation that is connected to a distribution network,.....*". Based on this, our understanding is we should include passive inverters and non-exporting batteries in the total nameplate capacity. They have the potential to export.


Proposed change 2: Agree with the second proposed change to clarify electric vehicle refers to V2G export capacity. Presumably the name plate capacity is set by the injection capacity of the vehicle charger.

Proposed change 3: Agree with the proposed tool tip. Network Tasman strongly disagrees with the suggestion to delete the 'Property Name' entry altogether. In circumstance where there are multiple ICPs at a single address, the 'Property Name' field is used to uniquely identify each of these ICPs. This situation is not uncommon in rural settings where, for example, a property may have separate ICPs for the house, pump shed and cow shed. Removing the 'Property Name' field would remove the sole avenue within the registry for EDB's to uniquely identify these ICPs.

Network Tasman submits that any changes to the registry should provide EDBs with sufficient time to amend existing processes and update existing datasets. The task to review our existing distributed generation database to reclassify ICPs with batteries (either standalone or combined with a generation source) is not insignificant and would be largely manual process. Accordingly, Network Tasman recommends the Authority provide distributors with a 6 month window prior to any changes coming into effect.

Many thanks,  
Daniel

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