

From: [Simon Hart](#)
To: [Distribution Feedback](#)
Cc: [Regulatory Team](#); [Karly Johnson](#); [Michael Warren](#)
Subject: Powerco Submission for "Minor changes to the registry"
Date: Tuesday, 26 September 2023 10:18:51 am
Attachments: [image001.png](#)

Our privacy policy is [here](#). It tells you how we may collect, hold, use and share personal information.

Hi,

See below our feedback on the proposed changes to registry.

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.

We agree with these additions. We are not aware of any combinations on our network that would not fit into the expanded list. Longer term, it may be necessary to introduce a "Part 10" type approach, adding a modular, hierarchical section for distributed generation.

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'.

We support this change.

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.*

While we are not sure of the problem definition that prompted this change, we have no issue with adding a tooltip. We consider that all information in registry should only be entered when it is correct, useful, and in the most appropriate field. However, regarding the specific exclusion of address information, we believe that it is sometimes necessary to include this information to identify the location of the ICP accurately.

E.g., a comms cabinet is located in the road reserve in a semi-rural location, in front a large farm parcel, but across the road from a house at number 486 Smith Road. We would consider the best way to locate this ICP would be to use the 'Property Name' Opposite 486 (leaving the

'Street Number' field blank). An alternative would be to just put "Opposite" in the 'Property Name' and put 486 in the 'Street Number', but this may cause the ICP to be incorrectly attributed to the incorrect address at 486 Smith Road during reporting and analysis.

We strongly disagree with the suggestion to delete the 'Property Name' field entirely. Our network includes a lot of rural areas, which necessitate using the field to locate connection. Importantly, the field provides an important point of differentiation to identify multiple connections on the same property.

E.g., a property address 6458 STATE HIGHWAY 3, WHANGANUI may have:

- PUMP 6458 STATE HIGHWAY 3
- DWELLING STATE HIGHWAY 3
- COWSHED STATE HIGHWAY 3
- WORKSHOP STATE HIGHWAY 3

Should a fault occur, or a meter replacement be required. There would be no way to determine which connection they need to attend, without information from outside of registry. We believe this is contrary to the stated intent of the address fields to readily locate the individual connections.

For this reason, we believe the 'Property Name' field should be included as part of the address for the My Meter site, and any other external sites where selecting the correct ICP is critical.

Regards,

Simon Hart
Performance, Quality and Compliance Coordinator

35 Junction Street, New Plymouth 4312 | Private Bag 2065, New Plymouth 4340
www.powerco.co.nz



Powerco is member of the Utilities Disputes Scheme, a free and independent service for resolving complaints about utilities providers.

CAUTION: This email and any attachments may contain information that is confidential. If you are not the intended recipient, you must not read, copy, distribute, disclose or use this email or any attachments. If you have received this email in error, please notify us and erase this email and any attachments. You must scan this email and any attachments for viruses.

DISCLAIMER: Powerco Limited accepts no liability for any loss, damage or other consequences, whether caused by its negligence or not, resulting directly or indirectly from the use of this email or attachments or for any changes made to this email and any attachments after sending by Powerco Limited. The opinions expressed in this email and any attachments are not necessarily those of Powerco Limited.
