



Electricity Authority  
[network.pricing@ea.govt.nz](mailto:network.pricing@ea.govt.nz)

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## Code Omnibus 3: Expanding the registry for DER detail

Transpower appreciates the opportunity to submit to the Authority's paper *Code Omnibus #3*, published 7 May 2024.<sup>1</sup>

We support the Authority advancing this important step towards increased visibility of distributed energy resources (DER) on distribution networks, which will enhance information for network management and power system operation. This submission responds to the proposal to expand registry fields to hold more detail on distributed generation at installation control points (ICPs). We support the information gathering proposed.

We have identified some consequential operational policy changes to Schedule 6.1 and the Registry access policy that may be needed to support the objectives for the proposed amendment. These are outlined below and in the appendix.

**Schedule 6.1 Distributed Generation application process.** The application process currently provides that some information provision – including the additional detail proposed – is discretionary [refer Part 1A clause 2 (3) and Part 2 clause 11 (3)]. A consumer with Distributed Generation (as a participant) will need to be obliged through the application process to provide the detail for the EDB to record it.

**Schedule 6.1 Part 3** provides that the information in the application is confidential [clause 25 (1)] and that once the information is used for the connection, the information must be destroyed [clause 25 (3)]. This provision may be counter to the intent for visibility of the information in the registry.

The **Registry access policy**<sup>2</sup> created under Code clause 11.28 describes that users of the registry may not use the registry information for "inappropriate access" described as "*for gaining a commercial advantage over another participant if the consumer has not initiated contact; for marketing, cold calling, direct marketing, or any other form of participant-initiated contact with potential customers.*" It is not clear how the proposed change would result in

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<sup>1</sup> [https://www.ea.govt.nz/documents/4823/Omnibus3\\_consultation\\_paper\\_-\\_May\\_2024.pdf](https://www.ea.govt.nz/documents/4823/Omnibus3_consultation_paper_-_May_2024.pdf)

<sup>2</sup> [Registry Access Policy \(ea.govt.nz\) 4.2 \(iii\)](#)

increased flexibility trader activity<sup>3</sup> without changing the register's access policy. In Australia, the centralised DER registry is only accessible to Network service providers and the AEMO.<sup>4</sup>

We note too, the *Customer and Product Data Bill*, introduced to Parliament Tuesday 21 May 2024, may also affect how the benefits articulated from the DER data in the registry are realised. The Bill establishes a framework to enable greater access to, and sharing of, customer and product data between businesses, to give customers in designated sectors greater control over how their customer data is accessed and used.<sup>5</sup> The Bill will (inter alia) require businesses that hold designated customer data (data holders) to provide that data to the customer and, with the customer's authorisation, to accredited third parties.<sup>6</sup> The registry access policy may need to clarify which business is the data holder (hence the counterparty for the Customer authorisation): for DER data, is it the EDB as party inputting the DER data or the service provider for the registry operation.

Finally, to support interested parties finding the code amendments under the *updating regulatory settings for distribution networks* programme (or any policy programme), the "Omnibus" title could usefully indicate the relevant policy programme.

For any questions about this submission please contact Micky Cave Senior Regulatory Advisor.

Kind regards,

Joel Cook  
Head of Regulation

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<sup>3</sup> Para. 3.37 We expect this [proposal] to ultimately benefit consumers by supporting reliable electricity supply and reducing costs and providing more options and opportunities to gain value from their DG. This is because we expect more accessible, detailed, DG information to support strengthened network management, more activity by flexibility traders, and more service options and products for consumers.

<sup>4</sup> [NATIONAL ELECTRICITY AMENDMENT \(REGISTER OF DISTRIBUTED ENERGY RESOURCES\) RULE 2018](#)

<sup>5</sup> MBIE [states](#) "the Bill will be rolled out to the banking and electricity sectors first"

<sup>6</sup> [Customer and Product Data Bill 44-1 \(2024\), Government Bill Explanatory note – New Zealand Legislation](#)

## Appendix: Code Schedule 6.1, and Registry policy under Code 11.28

Table 1 Part 6 Schedule 6.1 Distributed Generation applications – some information is discretionary

<u>Schedule 6.1</u>	DG size	<b>Initial application process</b>
Part 1	< 10kW	Providing information under clause 2 (3) where the application “ <b>may</b> include the following...(information)”
Part 1A	< 10kW (expedited one-stage application)	Providing information under clause 9B (2), where the application “ <b>must</b> include the following...(information)”
Part 2	> 10kW	Providing information under clause 11 (3), where the application at “ <b>may</b> include the following...(information)”
Part 3	General provisions: Confidentiality	25 (1) All information given with, or relating to, an application made under this Schedule to a distributor must be kept confidential by the distributor except as agreed otherwise by the person that gave the information  (3) The obligation to keep information confidential... includes (a) an obligation not to use the information for any purpose other than considering the application under this Schedule and enabling the connection or continued connection of the distributed generation...

The Registry access policy describes the use for registry:

The registry is the electricity industry’s national database of record for all ICPs. The registry is the primary mechanism for processing the switching of customers between electricity retailers. The registry is also an important source of information to support reconciliation of electricity quantities.

4.2 The following terms and conditions apply to all registry users: (a) each registry user ... (iii) must not attempt to gain inappropriate access to the registry, where “inappropriate access” means access:

- by means other than the access approved under this policy
- for gaining a commercial advantage over another participant if the consumer has not initiated contact
- for marketing, cold calling, direct marketing, or any other form of participant-initiated contact with potential customers.