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## Code Amendment Omnibus #3

Thank you for the opportunity to submit on the Code Amendment Omnibus #3 consultation. Our submission will be focused on the proposed amendments relating to increasing the level of distributed generation detail stored in the Electricity Registry. We will be primarily commenting on the technical aspects of the new DG related proposals, rather than any specific commentary around the proposed code amendments.

Digital Stock is a software development company based in Invercargill. Our flagship product, ARC is an operations system for distributors that allows, among other functions, them to fulfil their regulatory obligations to ensure that ICPs within the Electricity Registry are up to date. ARC is therefore responsible for storing a copy of Registry data and providing an interface that allows distributors to view and update Registry data.

Digital Stock strongly supports the Authority's proposal to increase the level of detail available for distributed generation. Many of our customers have already sought to keep a more detailed record of distributed generation than the Code currently requires be submitted to the Registry and as such, we have developed an 'internal distributed generation' feature into ARC. This feature aligns closely with the Authority's proposal in terms of the structure of the data, as a result, we assess that there should not be a substantial amount of work required to move to this new structure.

It is unclear from the consultation paper whether the Authority intends for this new structure to continue to be placed within the network event on the ICP in the Registry or within a new event type. It would be our preference that this new DG structure exist as an additional, new, event type to align with the approach taken for metering data, to prevent the network event from becoming unwieldy in terms of the total number of fields and so that existing interfaces related to the network event details can have as few changes as possible.

Digital Stock believes the Authority should give some consideration to the possibility of distributors choosing to migrate their existing internal DG records. In some cases, these records may not contain all fields that are going to be required, but in our opinion, it would still be beneficial to have this partial data in the Registry as it would be more detailed than the baseline migration that will be done by the Registry. This could be enabled by allowing pre-1 April 2025 ICPs to have additional partial data inputted (e.g. submitting records for Level 2 item details with a fuel type and nameplate capacity, but not submitting inverter details or battery capacity until such a time as a physical change is made to the DG on the ICP, or a distributor wishes to correct the information). This would allow for a semi-automated process for distributors to migrate their existing internal DG records, without having to go and input any extra information manually.

We also support the Authority's proposed transition plan. Six months following the amendment to the code and the release of an updated functional specification and Registry software update will give sufficient time to design, develop and test the new DG solution. However, we would still encourage the Authority to release technical proposals around the new changes (even if they are in an early draft format) as soon as possible, as doing so will aid in the planning and design of new interfaces and will give us a more accurate picture of the quantity of work needed to implement the new changes.

Finally, we also support the Authority's staged approach to these changes, particularly the proposal to provide the ability to supply DER information to the Registry. We look forward to seeing these proposals later this year.

Please do not hesitate to contact us if you have any questions about our submission.

Yours sincerely,

Jim Dowling  
Chief Executive Officer  
Digital Stock