

24 May 2024

Electricity Authority
PO Box 10041
Wellington 6143

Submitted via: Email to policyconsult@ea.govt.nz

Submission on Omnibus Three Consultation

Introduction

1. Thank you for the opportunity to submit on the Omnibus Three consultation.
2. We do not consider any part of this feedback is confidential.

Orion Summary Points

3. Orion commend the Authority's move to increase the visibility of DG on the low voltage network, to facilitate flexible use of that DG on the network.
4. We agree the proposal will increase the level of detail regarding the type, capacity, and functionality of DG installed at ICP level on the registry, to provide more accessible visibility.
5. Overall, we support the changes proposed by the Authority's consultation subject to some feedback on drafting, suggestions and some direct questions posed to the Authority.
6. Appendix A attached provides our response to the Authority's targeted questions.

Orion Additional Points

7. Orion's previous submission highlighted the need for EDBs and third parties to have visibility of CER.¹
8. In particular, distributors and third parties need access to EV location data especially for non-standard in home or on-route EV charger capacities (>7kW). This visibility will enable arrangements for use of this CER in future to provide non-network reinforcement in our own right or via requests to third parties. Provisioning the registry to record this data is a first step but there is still an issue of access to some of the input data.
9. At the time we submitted *"Whilst regulations allow EDBs to know where solar and batteries are installed on our network, we have no immediate knowledge of where EVs are located on our LV network. Currently NZTA only releases information on the suburb that EVs are registered in. More detailed information on the location of the registration is needed. To get this more detailed information, requiring electricians to comply with Part 6 for controllable EV chargers would be challenging – as proven by the fact that at present it is possible that a customer can connect an inverter for solar or solar/battery without our knowledge subject to metering requirements. Consequently, we would like the Authority to consider whether there is some work the Authority could lead in conjunction with NZ Transport Agency to allow access to EV registration data for network planning purposes? For instance, could the Authority work with the NZTA to provide anonymised street level registration information to EDBs or provision of aggregated "mesh block" MEP data via API so cluster analysis on peak loads can be undertaken to identify EV hotspots? . Such information would maintain the privacy of the household concerned but provide very valuable information for EDB network planning and decision making."*²
10. We are keen to understand if the EA has taken any steps in the direction described to facilitate this interim solution.

Concluding Remarks

11. Thank you for the opportunity to provide this submission.
12. If you have any questions or queries or aspects of the submission which you would like to discuss, please contact us on 03 363 9898.

Yours sincerely



Dayle Parris
Head of Regulatory and Commercial

¹ EDB regulatory settings improving competition and supporting a low emissions economy- <https://www.oriongroup.co.nz/assets/Our-story/Submissions/EA/Orion-response-to-EA-EDB-regulatory-settings-improving-competition-and-supporting-a-low-emissions-economy-Sep-2021.pdf>

Appendix A

Submitter/Organisation	Orion New Zealand Limited
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Feedback on the Omnibus format

Questions	Comments
Q1.1. Do you have any comments on the omnibus format or suggestions to improve the omnibus format?	Orion submits that moving along pressing issues or improvements to the Code via targeted Omnibus increases regulatory agility and we welcome it.

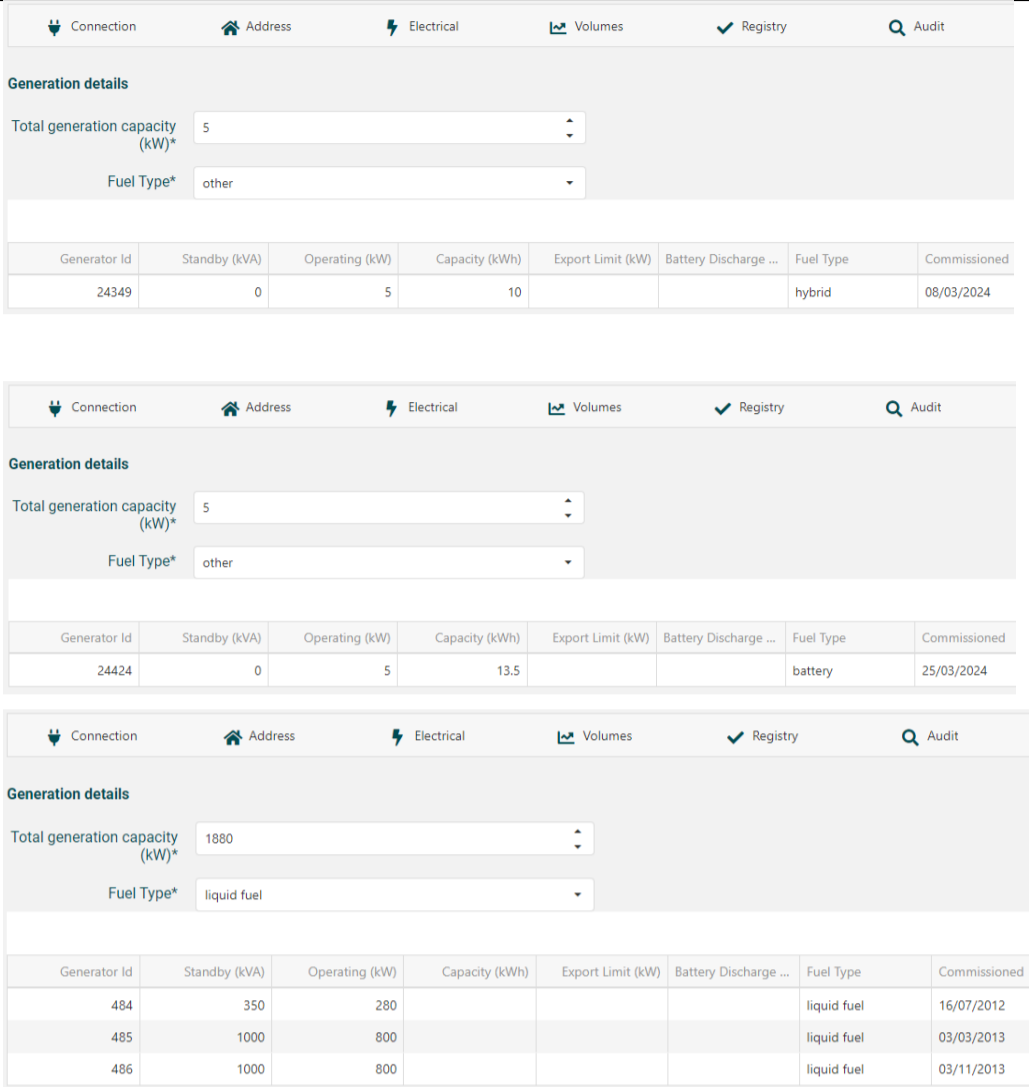
Inflation adjustment for prescribed maximum fees

Questions	Comments
Q2.1. Do you support the Authority's proposal to inflation adjust the fees in Schedule 6.5? Please explain your answer.	Orion submits in agreement with the proposal to adjust the fees in Schedule 6.5 by inflation across the intervening years since the fees were first introduced/set. Orion also supports a three-month transition period.
Q2.2. Do you agree the proposed amendment is preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010 Please explain your answer.	Orion submits in agreement that the proposed amendment should proceed ahead of a more fulsome review. Orion also submits that the amendment should include the ability to adjust the fees by CPI at 1 April each year given that a more fulsome review may take some time to conclude and in the meantime the cross subsidisation the amendment is looking to address is likely to widen again.
Q2.3. Do you agree with the analysis presented in this Regulatory Statement? If not, why not? Please explain your answer.	Orion submits in agreement with the regulatory statement.
Q2.4. Do you have any comments on the drafting of the proposed amendment?	Orion submits in agreement with the proposed drafting amendment for Schedule 6.5.

Expanding distributed generation fields in the registry

Questions	Comments																
Q3.1. Do you support the Authority's proposal to expand the DG fields in the registry using a two-level structure as described above. Please explain your answer.	<p>Orion supports the Authority's proposal to expand th DG fields in the registry to a two-level structure.</p> <p>We appreciate the Authority's plan to update its guidance contained in "How to enter distributed generation – User guide."</p> <p>As submitted previously to the Authority³, distributors and third parties need access to EV location data especially for non-standard in home or on-route EV charger capacities (>7kW). This visibility will enable arrangements for use of this CER in future to provide non-network reinforcement in our own right or via requests to third parties. Provisioning the registry to record this data is a first step but there is still an issue of access to some of the input data.</p> <p>Orion is confident that it can provide the data the proposal is requesting as we already record much of it in our internal systems. As an example, the below screen shots show various combinations of such data from our internal system.</p> <div style="border: 1px solid #ccc; padding: 5px; margin: 10px 0;"> <p>Generation details</p> <p>Total generation capacity (kW)* <input type="text" value="8.2"/></p> <p>Fuel Type* <input type="text" value="solar"/></p> </div> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Generator Id</th> <th>Standby (kVA)</th> <th>Operating (kW)</th> <th>Capacity (kWh)</th> <th>Export Limit (kW)</th> <th>Battery Discharge ...</th> <th>Fuel Type</th> <th>Commissioned</th> </tr> </thead> <tbody> <tr> <td>24399</td> <td>0</td> <td>8.2</td> <td>0</td> <td>5</td> <td></td> <td>solar</td> <td>20/03/2024</td> </tr> </tbody> </table>	Generator Id	Standby (kVA)	Operating (kW)	Capacity (kWh)	Export Limit (kW)	Battery Discharge ...	Fuel Type	Commissioned	24399	0	8.2	0	5		solar	20/03/2024
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³ EDB regulatory settings improving competition and supporting a low emissions economy- <https://www.oriongroup.co.nz/assets/Our-story/Submissions/EA/Orion-response-to-EA-EDB-regulatory-settings-improving-competition-and-supporting-a-low-emissions-economy-Sep-2021.pdf>

	 <p>Orion submits that more often than not many of the CER devices customers will connect will happen via an inverter or hybrid inverter except in the case of liquid fuel generators. This means most level 2 information will pertain to the inverter. We submit that the Authority should consider making the Code more explicit about the need to apply to EDBs upon the upgrade or removal of an inverter otherwise we may not become aware of changing devices connected to that inverter which are the cause of the inverter upgrade e.g. the upgrade of a hybrid inverter to facilitate battery storage. Currently, compliance with inverter upgrades or removals varies based on the electrician's interpretation highlighting the need for the Code to be more explicit. Electricians seem to be confused about whether they need an ROI or CoC for an inverter upgrade at present.</p> <p>The Authority has indicated that as part of registry upgrades to accommodate the new data, transferred data will be tagged. The Authority has also indicated that EDBs will not need to back date information from prior to 1 April 2025. Does the Authority have any concern should an EDB want to voluntarily update data retrospectively (from prior to 1 April 2025) if that is available in our internal systems?</p> <p>Orion submits that one additional piece of information the Authority could request and have recorded in the Registry is whether a liquid fuel generator is synchronised to the network. This would differentiate these from generators that are primarily used for standby and are not exporting e.g. .most liquid fuel generators that are synchronised to the network do so to handle the base load (control period) or use the grid as a load bank for maintenance meaning they may run on load for 30 minutes each month (standby generator).</p>
<p>Q3.2. Do you agree with the transition plan and a six-month transition period? Please explain your answer.</p>	<p>Orion submits that we can work within the six-month transition plan the Authority proposes for go live at 1 April 2025.</p> <p>Orion would appreciate timely information on the timing of when the new registry fields are available in the test system so we can resource and plan for mapping fields and testing as soon as possible. In addition, Orion would appreciate timely information on the field structures and formats planned for the registry fields.</p>
<p>Q3.3. Do you agree the proposed amendment is preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010 Please explain your answer.</p>	<p>Orion submits that we agree the proposed amendment is preferable to the other options.</p>
<p>Q3.4. Do you agree with the analysis presented in this Regulatory Statement? If not, why not? Please explain your answer.</p>	<p>Orion submits in agreement with the analysis presented in the regulatory statement.</p>

Q3.5. Do you have any comments on the drafting of the proposed amendment?

Orion submits we prefer a different drafting of proposed clause 1AA. We prefer “that are capable of synchronising to the distributor’s network” rather than “that inject electricity into the distributor’s network” because if an installer puts a zero export limit on a solar inverter then technically no solar application is required at present. We have already had two applicants challenge us on this.

Proposed Drafting:

*(1AA) To avoid doubt, for the purposes of this clause, **distributed generation** includes, batteries, inverters, and vehicle-to-grid installations that inject **electricity** into the **distributor’s network**.*

Proposed Redrafting

*(1AA) To avoid doubt, for the purposes of this clause, **distributed generation** includes, batteries, inverters, and vehicle-to-grid installations that **are capable of synchronising to inject electricity** into the **distributor’s network**.*

Orion submits that the drafting of clause 10 is confusing, appears contradictory reducing clarity of the intent of the clause. However, the explanation in section 3.3 of the consultation does provide clarification of the intent of the drafting. Our understanding is that the EA’s intention is for us to

- populate the new information for only new DG and additional DG at new or existing ICPs respectively after 1 April 2025
- populate the new information for DG at an ICP if the EDB witnesses and records information from testing or inspection after 1 April 2025.

A drafting change is required to ensure clarity of what is required as the current drafting is not intuitive:

Proposed Drafting:

(10) A **distributor** is not required to provide information under subclause (1)(o) for an **ICP** in existence prior to 1 April 2025, unless:

- (a) the **distributor** observes the testing of, or inspects, the **ICP** under clauses 7, 9C, or 22 of Schedule 6.1 of the Code; or
- (b) an application is made to connect new **distributed generation** at the **ICP** under Part 6 of the Code.

Proposed Redrafting:

(10) A **distributor** is not required to provide information under subclause (7)(1)(o) for an **ICP** in existence prior to 1 April 2025, unless **subsequently**:

- (a) an application is made to connect **additional** new **distributed generation**, **under Part 6 of the Code**, at ~~the~~ an existing **ICP**. or
- (b) the **distributor** **collects information as part of observation of testing or inspection at the ICP** under clauses 7, 9C, or 22 of Schedule 6.1 of the Code;