Code amendment omnibus #4 – Submission form

Submissions due 5.00pm Tuesday **15 October 2024**, to [policyconsult@ea.govt.nz](mailto:policyconsult@ea.govt.nz) with “Code omnibus #4 consultation” in the subject line.

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| Submitter / Organisation |  |

### Feedback on the omnibus format

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| Questions | Comments |
| Q1.1. Do you have any comments on the omnibus format or suggestions to improve the omnibus format?  Please explain your answer |  |

### Improving consumer access to their electricity information

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| Questions | Comments |
| Q2.1. Do you support the Authority’s proposal to amend clause 11.32B(1) of the Code to reduce the time a retailer must respond to most requests for consumer electricity information?  Please explain your answer |  |
| Q2.2. Do you support the Authority’s proposal to amend clause 11.32B(3) of the Code to increase the number of responses a retailer must provide in the next 12-month period without charge, from 4 to 12, thereafter all responses are free of charge?  Please explain your answer |  |
| Q2.3. Do you support the Authority’s proposal to amend the Code to clarify that a retailer must provide information under clause 11.32A about the injection of electricity into a network and raw meter data?  Please explain your answer |  |
| Q2.4. Do you agree the proposals 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 |  |
| Q2.5. Do you agree with the analysis presented in this Regulatory Statement? If not, why not? |  |
| Q2.6. Do you have any comments on the drafting of the proposed amendment? |  |

### Removal of time error management obligations

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| Questions | Comments |
| Q3.1. Do you support the Authority’s proposal to remove time error management requirements for the system operator?  Please explain your answer. |  |
| Q3.2 In particular, do you, or anyone in New Zealand you are aware of, still use synchronous clocks for business-critical applications? If so, do you consider the cost of replacement with non-synchronous clocks to be material?  Please explain your answer. |  |
| 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 |  |
| Q3.4. Do you agree with the analysis presented in this Regulatory Statement? If not, why not? |  |
| Q3.5. Do you have any comments on the drafting of the proposed amendment? |  |

### Clearing manager to settle FPVV hedges

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| Questions | Comments |
| Q4.1. Do you Do you support the Authority’s proposal to include a new hedge settlement agreement form for fixed price variable volume (FPVV) hedges to be settled by the clearing manager?  Please explain your answer |  |
| Q4.2 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. |  |
| Q4.3. Do you agree with the analysis presented in this Regulatory Statement? If not, why not? |  |
| Q4.4. Do you have any comments on the drafting of the proposed amendment? |  |

### Clearing manager to settle FPVV hedges

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| Questions | Comments |
| Q5.1. Do you support the Authority’s proposal to amend clause 8.61(2) of the Code so that the Authority must only consult on under frequency events where the causer cannot be identified, or an alleged causer denies culpability?  Please explain your answer |  |
| Q5.2 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 |  |
| Q5.3. Do you agree with the analysis presented in this Regulatory Statement? If not, why not? |  |
| Q5.4. Do you have any comments on the drafting of the proposed amendment? |  |