

Code review programme #6 submission

Please complete and return this form to provide feedback on [Code review programme #6](#).

Submissions are due by 5.00pm Tuesday 1 October 2024 to policyconsult@ea.govt.nz with 'Code review programme #6 consultation' in the subject line.

1. Code amendment proposals

Submitter	Tamiris Robinson
Organisation	Nova Energy
Proposal number	CRP6-007 – Validity periods and expiry dates in metering reports

Questions	Comments
Q1. Do you agree the issue(s) identified by the Authority need attention? Any comments?	Yes
Q2. Do you agree with the objectives of the proposed amendment? Any comments?	Yes
Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Any comments?	Yes
Q4. Do you agree the proposed amendment is preferable to any other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objectives in section 15 of the Electricity Industry Act 2010.	Yes

Q5. Do you have any comments on the drafting of the proposed amendment?	No
Q6. Do you have any further comments on the proposal?	No
Q7. Is any part of your submission confidential? If yes, please explain which part, why it is confidential and provide a publishable replacement (refer paragraphs Error! Reference source not found. to Error! Reference source not found. of the consultation paper)	No

Submitter	Tamiris Robinson
Organisation	Nova Energy
Proposal number	CRP6-010 – Certification of reconciliation participants

Questions	Comments
Q1. Do you agree the issue(s) identified by the Authority need attention? Any comments?	Yes. It is important that the Authority enables the certification of reconciliation participants to extend beyond 24 months when their systems and controls are clearly adequate to justify that.
Q2. Do you agree with the objectives of the proposed amendment? Any comments?	Yes. Retailers should be enabled to reduce audit costs if their internal controls are very good.
Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Any comments?	Yes.

Q4. Do you agree the proposed amendment is preferable to any other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objectives in section 15 of the Electricity Industry Act 2010.	Yes.
Q5. Do you have any comments on the drafting of the proposed amendment?	No
Q6. Do you have any further comments on the proposal?	No
Q7. Is any part of your submission confidential? If yes, please explain which part, why it is confidential and provide a publishable replacement (refer paragraphs Error! Reference source not found. to Error! Reference source not found. of the consultation paper)	No

Submitter	Tamiris Robinson
Organisation	Nova Energy
Proposal number	CRP6-016 – Event of default missing from ICP transfer provisions

Questions	Comments
Q1. Do you agree the issue(s) identified by the Authority need attention? Any comments?	Yes. The change is largely technical in nature and is unlikely to be triggered, but it does need to be made.

Q2. Do you agree with the objectives of the proposed amendment? Any comments?	Yes.
Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Any comments?	Yes.
Q4. Do you agree the proposed amendment is preferable to any other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objectives in section 15 of the Electricity Industry Act 2010.	Yes.
Q5. Do you have any comments on the drafting of the proposed amendment?	No
Q6. Do you have any further comments on the proposal?	<p>While Nova appreciates the 3 month transition period proposed by the Authority, it does not think this is necessary.</p> <p>Nova does not intend updating its contracts with customers as a direct result of the proposed Code change. This is because Nova's general terms already broadly cover any event of default as defined in the Code (as amended from time to time) that can trigger the ICP reallocation process.</p> <p>Nova also reflects that this is not a change that customers are going take note of, and the process of advising customers of a change in contractual terms is not minor.</p>
Q7. Is any part of your submission confidential? If yes, please explain which part, why it is confidential and provide a publishable replacement (refer paragraphs Error! Reference source not found. to Error! Reference source not found. of the consultation paper)	No