

Code review programme #6 submission form

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	Simon Bocock
Organisation	Ngawha Generation Limited
Proposal number	CRP6-0__004

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.	<p>We agree with excluding embedded generators where that generator is not a retailer; however, we would prefer that the criteria "and its electricity consumption is less than 5% of its generation" be deleted and replaced by "and that the electricity consumption is only for the purpose of generating and activities relating to that the generation at that point of connection.</p> <p>Ngawha proposes this change to ensure that the Authority achieves the outlined efficiency benefits rather than the 5% being binding. Requiring a check that consumption is less than 5% introduces unnecessary compliance costs. This includes implementing a quarterly process to remind someone to check, complete the calculation, and obtain internal approval.</p> <p>Despite Ngawha's electricity consumption from the clearing manager being only 36,000 kWh in the last 12 months (0.01% of generation), our internal policies would require these compliance steps be completed given the obligation in The Code.</p>

Q5. Do you have any comments on the drafting of the proposed amendment?	Yes 1.1 (b) (ii) is deleted and replaced by the following: The electricity purchased by the embedded generator from the clearing manager during the previous 3 calendar months was only for the purpose of generating and activities relating to that generation at that point of connection.
Q6. Do you have any further comments on the proposal?	Ngawha Generation had applied for an exemption from this obligation; however, it has been withdrawn given this consultation.
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 1.10 to 1.12 of the consultation paper)	No

Code amendment proposals

Submitter	Simon Bocock
Organisation	Ngawha Generation Limited
Proposal number	CRP6-0__010

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. Ngawha Generation received an audit score of 0, but its certification was only for two years. This amendment will reduce compliance costs.
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 1.10 to 1.12 of the consultation paper)	No