

## Code review programme #6 submission form

### 1. Code amendment proposals

<b>Submitter</b>	<b>Mary Ann Mitchell</b>
<b>Organisation</b>	<b>IEGA</b>
<b>Proposal number</b>	<b>CRP6-003</b>

<b>Questions</b>	<b>Comments</b>
Q1. Do you agree the issue(s) identified by the Authority need attention? Any comments?	Yes Comments: We note that c.11.3 requires an ICP Identifier for a wider range of points of connection than the definition of ICP.
Q2. Do you agree with the objectives of the proposed amendment? Any comments?	Yes Comments: Industry participants are already adhering to Code obligations by virtue of having an ICP Identifier.
Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Any comments?	Yes Comments: The proposal seeks to eliminate any risk of confusion between who must have an ICP and who must have an ICP Identifier.
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.	No. Details of your preferred option: It is strongly recommended that the words in c.11.3 also be used in the definition of ICP. In theory, an ICP Identifier would only be issued to an ICP so it makes sense for the types of points of connection for these two requirements to be described identically.
Q5. Do you have any comments on the drafting of the proposed amendment?	See answer to Q4.
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	No

<b>Submitter</b>	<b>Mary Ann Mitchell</b>
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<b>Proposal number</b>	<b>CRP6-004</b>

<b>Questions</b>	<b>Comments</b>
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>No.</p> <p>Details of your preferred option: Instead of applying an arbitrary threshold on electricity consumption (of 5%) we suggest the Code refer to 'electricity for its own use'. This approach has been applied by the Authority in granting an exemption to Lodestone – one of the criteria for expiration of their exemption is:</p> <p style="padding-left: 40px;">“2. Lodestone purchasing electricity from the clearing manager for a purpose other than its own use”</p> <p>The recommended drafting is:</p> <p>(b) excludes an embedded generator where:</p> <p>(i) the embedded generator is not a retailer and does not intend to become a retailer during the next 3 calendar months; and</p> <p>(ii) the electricity purchased by the embedded generator from the clearing manager during the previous, <u>and expected to be purchased in the next, 3 calendar months</u> is <u>for its own use less than 5% of the electricity sold by the embedded generator to the clearing manager and is not reasonably expected to exceed 5% in the next 3 calendar months</u></p>
Q5. Do you have any comments on the drafting of the proposed amendment?	See answer to Q4.
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

No