

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 CRP6-002

Submitter	Stefan Kirkwood
Organisation	Bluecurrent
Proposal number	CRP6-002

Questions	Comments
Q1. Do you agree the issue(s) identified by the Authority need attention? Any comments?	Yes, but the issue definition is not completely accurate as it indicates that consumers may opt out of the network control option if they were to not allow sharing of the controllable load. This is inaccurate as many network connection standards make it mandatory for the consumer to make their controllable load available to the network.
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.	No comment
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	No

(refer paragraphs **Error! Reference source not found.** to **Error! Reference source not found.** of the consultation paper)

2. Code amendment proposals CRP6-007

Submitter	Stefan Kirkwood
Organisation	Bluecurrent
Proposal number	CRP6-007

Questions	Comments
Q1. Do you agree the issue(s) identified by the Authority need attention? Any comments?	No. The approach to use the certification expiry dates rather than a set number of months does not cause any confusion or additional time for participants. MEPs and other participants are not interested in validity periods, only expiry dates.
Q2. Do you agree with the objectives of the proposed amendment? Any comments?	Yes, but this proposal creates inefficiency and adds no value downstream from an ATH when it is converted to an expiry date in information exchanges.
Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Any comments?	No. The CBA is inaccurate as there will be system, process, and associated costs to the ATH that uses the difference between the certification and certification expiry dates to display the validity period.
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
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!	No

Reference source not found. of the consultation paper)

3. Code amendment proposals CRP6-009

Submitter	Stefan Kirkwood
Organisation	Bluecurrent
Proposal number	CRP6-009

Questions	Comments
Q1. Do you agree the issue(s) identified by the Authority need attention? Any comments?	No, as it is unclear why this issue exists when almost all metering components being certified are digital and also have the pulse output option available. If it is only for non-smart meters, it is unclear why the EA is spending industry time and resource amending the Code for such a small group.
Q2. Do you agree with the objectives of the proposed amendment? Any comments?	Yes, but it is unclear why the pulse output amendments previously made to the Code do not allow this to be achieved.
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?	The proposed amendment makes sense but it important to note that the statement made that <i>"the Authority will consider a wider review of the testing requirements; however, such a review is too material for the Code Review Programme"</i> is unhelpful as the industry has also been told that the EA does not currently have the resource for larger scale projects that focus on metering. If smaller issues, like this one, can be resolved through the Code Review Programme the EA need to ensure that the most important

	issues are selected as it is unclear why this specific issue was selected over others raised and supported by the independent ATH forum participants.
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

4. Code amendment proposals CRP6-010

Submitter	Stefan Kirkwood
Organisation	Bluecurrent
Proposal number	CRP6-010

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, Bluecurrent is supportive of this amendment's main benefit which will reduce audit costs for relevant participants where those participants have a high level of compliance and pose a low risk to the market.
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

5. Code amendment proposals CRP6-011

Submitter	Stefan Kirkwood
Organisation	Bluecurrent
Proposal number	CRP6-011

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.	No comment
Q5. Do you have any comments on the drafting of the proposed amendment?	<p>Yes, Bluecurrent believes the amendment should also include timeframes that the components are to be returned within and set clearer expectations of the condition of those components are to be returned than "without damage".</p> <p>The proposed clause 2A(b) is problematic as it states that the details are regarding the "metering installation" but the In-Service testing process is only relevant to metering</p>

	<p>components. This obligation on the ATH would be a fundamental shift from what is currently required to conduct and In-Service testing program.</p> <p>The amendment should also be more prescriptive on what the sufficient records are that are required in 2A(b), and how these records are expected to be provided to the ATH conducting the In-Service Testing?</p> <p>It is also unclear how the displacing ATH (or any other party) will know that the specific metering components have been selected in a sample. This information is pivotal to participants being able to meet this Code obligation. In practice it is the responsibility of the MEP to ensure that the removed metering equipment is returned to the correct owners and putting this obligation on the ATH is a switch from that.</p>
<p>Q6. Do you have any further comments on the proposal?</p>	<p>No</p>
<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)</p>	<p>No</p>