Submitter	■■■■■■■■■■
Organisation	**Private individual**
Proposal number	**CRP6-007** Validity periods and expiry dates in metering reports Problem 1 (I completely agree with Problem 2)

Questions	Comments
Q1. Do you agree the issue(s) identified by the Authority need attention? Any comments?	"*This inconsistency in approach produces the potential for confusion and additional time for participants in calculating validity periods*" Having the expiry date _saves_ time for the participant that needs to record the certificate in Registry. I refer to the Registry Functional Specification 1.4 "Attributes of an ICP"; in particular 1.4.10 " Level 2 – Metering Installation Information Attributes" where it requires: *Metering Installation Certification Expiry Date* *The metering installation certification expiry date, identified within the metering installation certification report, or the date that metering installation certification was cancelled.* The certifier needs to be aware of the current date and the regulations stating the maximum certification period. Then someone has to add the two together to obtain an expiry date to tell Registry. It is not as if the expiry date does not need to be calculated. If the proposed change also included a proposal to change Registry to remove the "expiry date" and replace it with a "number of months of validity" this proposal would at least be consistent. However, for consistency I refer to a number of other documents and objects I have sitting around at home. The Department of Internal Affairs Passport Office issues passports. It is bound by international treaty for passports to have an issue date and a number of months of validity. Despite this, my passport shows an issue date and an expiry date. When it expires is more important for an Immigration Officer than how long the passport is good for. My driver's license has an expiry date rather than a number of months of validity. When I use my credit card online, I'm asked for its expiry date rather than how many months it is useful for. My perishable groceries all have "best before" or "use by" dates rather than the number of days of shelf life.

	This is all because it is faster, quicker and more reliable at the end of life to check against a single date than to re-do calendar maths each time the document is referenced.
Q2. Do you agree with the objectives of the proposed amendment? Any comments?	No If you are worried that some certificates have months and others have an expiry date, then simply require both to be recorded. As I note above, **the important one is the expiry date**. The certifier, or their software, will have both available. Also, refer to Registry Functional Specification sub-process AC-020 Produce Audit compliance report, in particular Rule AC020MEP08 which already screens for bad certificate validity periods.
Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Any comments?	No. Not having the expiry date to hand makes the process of recording a certificate in Registry less efficient.
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 Leave it alone.
Q5. Do you have any comments on the drafting of the proposed amendment?	
Q6. Do you have any further comments on the proposal?	
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