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15 October 2024

Submissions
Electricity Authority
PO Box 10041
Wellington 6143

Nova Energy Limited
PO Box 3141, Wellington 6140

By email: policyconsult@ea.govt.nz

Re: Code amendment omnibus four: September 2024

Nova Energy's (Nova) specific responses to the Authority's questions are appended to this letter.

Yours sincerely



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Nova submission: Omnibus four consultation

Q No.	Question	Response
	Feedback on the omnibus format	
1.1	<p>Do you have any comments on the omnibus format or suggestions to improve the omnibus format?</p> <p>Please explain your answer</p>	<p>Nova does not have any issues with the format and is generally in favour of reducing the number of consultation papers, particularly when the topics covered are not particularly contentious. Care must be taken that contentious issues warranting extensive analysis should not be included in an Omnibus paper as that then creates the risk that interested and affected parties may not pick up on the significance of the changes and thereby fail to provide feedback within the Authority's timelines.</p>
	Improving consumer access to their electricity information	
2.1	<p>Do you support the Authority's proposal to amend clause 11.32B(1) of the Code to reduce the time a retailer must respond to most requests for consumer electricity information?</p> <p>Please explain your answer</p>	<p>Generally yes, but with a slightly longer timeframe than proposed (especially given the expanded scope of information that needs to be provided – particularly injection information).</p> <p>Nova considers the proposal to respond to 70% of requests with 1 business day and 90% of requests within 2 business days is both too short and overly administrative. Other solutions could require retailers to respond:</p> <ul style="list-style-type: none"> • to all requests within 3 or 4 working days; or • to 90% of requests within 3 or 4 business days, provided all requests are responded to within 5 business days. <p>The difficulty Nova has is that the number of EIEP data requests from residential consumers is still low (~150 per year) and are somewhat irregular in terms of occurrence. On top of this there are a greater number of commercial enquiries, either directly or through an agent.</p> <p>With the numbers experienced, it is not currently viable for Nova to dedicate resources to this specific EIEP response activity. As such, when an Agent submits a request for many ICPs at once, e.g. Nova has experienced as many as nearly 500 in a single request, it is very difficult to both meet tight turnaround times for the other commercial and residential requests that may come in at the same time.</p>

Q No.	Question	Response
		<p>By forcing the timeframes proposed in the consultation paper, the Authority will be imposing inefficiencies in retailers' administrative functions by forcing increased processing capacity to meet occasional heavy workloads.</p> <p>Nova is in no doubt that the turnaround times need to improve, and that they will do so. However:</p> <ul style="list-style-type: none"> • This will occur as and when the demand justifies further investment in systems, which Nova expects is likely to occur once PowerSwitch has developed the capability to load and analyse the data being provided. • Many retailers (including Nova) already make electricity consumption data available (for the past 24 months) in digestible, informative and easily accessible ways without request (e.g., on bills and through online and app accounts access systems). This could be captured (via an amendment to Code clause 11.32B(2)) as an acceptable means of complying with consumption data requests.
2.2	<p>Do you support the Authority's proposal to amend clause 11.32B(3) of the Code to increase the number of responses a retailer must provide in the next 12-month period without charge, from 4 to 12, thereafter all responses are free of charge?</p> <p>Please explain your answer</p>	<p>Yes. Nova is amenable to increasing the number of responses a retailer must provide over a 12 month period from 4 to 12, and to making all subsequent responses subject to a reasonable charge.</p> <p>However, this would be easier on retailers if a slightly greater degree of flexibility on timeframes than what is proposed is granted, as noted in question 2.1. Nova's current resources are limited, and the implementation of the amended clause may lead to an increase in requests, similar to other retailers, while maintaining the same resource availability. The Authority should take this into consideration.</p> <p>Nova is confused about the reference to March 2026 in the proposed wording at Code clause 11.32B.</p>
2.3	<p>Do you support the Authority's proposal to amend the Code to clarify that a retailer must provide information under clause 11.32A</p>	<p>Yes. However, note that the proposed wording at 11.32A(2)(a) "or services provided to the consumer" is overly broad, confusing and goes beyond capturing distributed generation data and raw meter data. Nova is confused about the purpose of this wording.</p>

Q No.	Question	Response
	<p>about the injection of electricity into a network and raw meter data?</p> <p>Please explain your answer</p>	
2.4	<p>Do you agree the proposals preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010</p>	<p>Yes, subject to Nova's comments in this submission.</p>
2.5	<p>Do you agree with the analysis presented in this regulatory statement? If not, why not?</p>	<p>Yes, subject to Nova's comments in this submission.</p>
2.6	<p>Do you have any comments on the drafting of the proposed amendment?</p>	<p>No additional comments.</p>