



T R A N S P O W E R

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Electricity Authority

15 October 2024

By email: policyconsult@ea.govt.nz

Code Amendment Omnibus #4

We appreciate the opportunity to submit to the Authority's consultation *Code Amendment Omnibus #4*, published 3 September 2024.

We submit on the first, second and fourth proposals of the four, in the appendix:

- Improving consumer access to their electricity information
- Removal of time error management obligations
- Authority's consultation for Under-Frequency events.

Yours sincerely

Joel Cook
Head of Regulation

Appendix- Response to Questions

Code amendment omnibus #4 – Submission form

Submissions due 5.00pm Tuesday **15 October 2024**, to policyconsult@ea.govt.nz with "Code omnibus #4 consultation" in the subject line.

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|---------------------------------|---------------------------|
| Submitter / Organisation | Transpower NZ Ltd. |
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Feedback on the omnibus format

| Questions | Comments |
|--|--|
| Q1.1. Do you have any comments on the omnibus format or suggestions to improve the omnibus format? Please explain your answer | Yes. We support the approach as an efficient way to progress a range of discrete code changes. Two improvements are: <ol style="list-style-type: none">(1) Clarity on the difference (if any) between the omnibus format and the review format; as each approach is described as the mechanism for multiple discrete code changes(2) For transparency and good process, identifying the source of the code change proposal e.g. whether as the result of Authority's monitoring and compliance function, or driven by policy programme, or a Code Amendment Request from a participant or person, or some other means. |

Improving consumer access to their electricity information

| Questions | Comments |
|---|--|
| Q2.1. 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? Please explain your answer | No comment on the specific question. We note that an objective for the Authority's Code amendment and the Government's Consumer Data Right (CDR) Bill are similar: <ul style="list-style-type: none">• using consumption data with as the consumer or through a third party "by recommending products and services for them based on their consumption patterns (Authority)¹• "any consumer of electricity should be able to request or consent to their data being provided by a designated data holder to third parties or accredited requestors to |

¹ [Code amendment omnibus four: September 2024](#)

| | |
|--|---|
| | <p>support consumer decision making in the electricity sector.” (MBIE)²</p> <p>We support that MBIE and the Authority are recognising synergies across its policy development. Transpower has made its own submission to the CDR available (here).</p> |
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Removal of time error management obligations

| Questions | Comments |
|---|----------|
| <p>Q3.1. Do you support the Authority’s proposal to remove time error management requirements for the system operator? Please explain your answer.</p> | Yes. |
| <p>Q3.2 In particular, do you, or anyone in New Zealand you are aware of, still use synchronous clocks for business-critical applications? If so, do you consider the cost of replacement with non-synchronous clocks to be material? Please explain your answer.</p> | n/a. |
| <p>Q3.3. Do you agree the proposed amendment is 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> | Yes. |
| <p>Q3.4. Do you agree with the analysis presented in this Regulatory Statement? If not, why not?</p> | Yes. |
| <p>Q3.5. Do you have any comments on the drafting of the proposed amendment?</p> | No. |

² [Discussion paper — exploring a consumer data right for the electricity sector \(mbie.govt.nz\)](#)

Under-Frequency events

| Questions | Comments |
|--|---|
| <p>Q5.1. Do you support the Authority's proposal to amend clause 8.61(2) of the Code so that the Authority must only consult on under frequency events where the causer cannot be identified, or an alleged causer denies culpability? Please explain your answer.</p> | <p>Yes. We note that whether or not consultation occurs, the proposed drafting retains that the Authority must publish a determination.</p> <p>These determinations will become more important for system operation understanding under other proposed changes to Part 8 (<i>see FSR003 below</i>) that propose a causer can additionally be an EDB or an owner of a BESS, as well as the grid owner or a generator.</p> <p>A transparent event record will support understanding system responses when electricity is flowing in both directions and there is more distributed generation.</p> <p><i>"FSR-003: Include distributors and energy storage systems as potential causers of under-frequency events"</i> Part 8 Code amendment proposal – Part 1</p> |
| <p>Q5.2 Do you agree the proposed amendment is 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.</p> |
| <p>Q5.3. Do you agree with the analysis presented in this Regulatory Statement? If not, why not?</p> | <p>Yes. We agree that the primary benefit is that the Authority saves time and the process is more efficient by not having to consult for straightforward UFE matters where the causer is not disputed.</p> |
| <p>Q5.4. Do you have any comments on the drafting of the proposed amendment?</p> | <p>Yes. The proposed drafting suggests the process should be able to conclude that there may not be an identifiable causer, if this is intended?</p> <p>The proposed drafting states <i>8.61 (2) In circumstances where the causer of an under-frequency event is not identified in the system operator's report provided under clause 8.60(5), or the alleged causer as identified in the system operator's report denies it is the causer...</i></p> |