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Vector Limited
101 Carlton Gore Road
PO Box 99882, Newmarket
Auckland 1149, New Zealand
www.vector.co.nz
Corporate Telephone
+64-9-978 7788
Corporate Facsimile
+64-9-978 7799

Submissions
Electricity Authority
PO BOX 10041
WELLINGTON

To whom it may concern

Submission on Creating Additional Fields in the Registry

Introduction

1. Vector welcomes the opportunity to submit on the Electricity Authority's (Authority) consultation paper "Creating Additional Fields in the Registry", dated 13 December 2011.
2. No part of this submission is confidential and Vector is happy for it to be made publicly available.

Vector's views

3. Vector broadly supports the Authority's proposals. We have some specific observations:
 - a. 3.8.3(d): The labelling would be more accurate if the term "unmetered capacity" was used rather than "unmetered consumption".
 - b. 3.8.5(c): Population of liveness dates will enable checking that metering was installed and certified before liveness.
 - c. 3.8.5(e): The amended rule for liveness dates requires the distributor to advise the registry of the liveness date before the electricity is traded at the ICP. This will not be practical if trading begins shortly after liveness. Vector recommends this proposal be amended to allow distributors a reasonable amount of time to advise the registry.
 - d. 3.8.6(c): Population of GPS co-ordinates will assist in locating metering for faults more rapidly, and in certification and confirmation of correct ICP numbers.

- e. 3.8.6(e): What the GPS co-ordinates refer to should be standardised, ie disconnection point versus building location, switchboard, or metering point.

Distributed generation capacity and fuel type

4. As reasonable and prudent network operators, distributors have an interest in maintaining up to date information about distributed generation (DG) installations on their networks, including the capacity of the plant. Improved DG information would be beneficial but the DG operators themselves must take a share of the responsibility in providing the relevant data.
5. Vector therefore has some concerns with regards to proposal D1: Distributed generation capacity and fuel type. The Authority appears to assume that distributors will be able to gather the necessary data to input this information in the registry. However, if DG operators do not advise distributors that the DG has been installed/connected, distributors will have an incomplete DG picture on their network.
6. Even where a DG operator does notify the distributor of its connection, distributors have no way of tracking whether the DG remains operative or has been replaced within existing installations. Distributors have no power to compel the provision of this information so it would be unreasonable to place the compliance burden for gathering this information onto distributors.
7. The consultation paper (paragraph 3.3.24) seems to imply that distributors will be expected to seek out and identify all DG connected on their network since 2007. If this is the Authority's intention, we note that it is unlikely to be practical.
8. Vector therefore **recommends** that:
 - a. the onus is placed on the owner of the DG equipment to regularly supply information regarding the DG (including any information required for the registry) to the distributor;
 - b. retailers are also required to provide information to distributors that they possess regarding DG installations at consumers' premises; and
 - c. distributors are required only to update the registry with the DG capacity and fuel type information they receive from DG operators and retailers.

Areas where clarification would be useful

9. Before the proposals are finalised, the Authority should also clarify the following matters in relation to D1, D2 and D3:

- a. the detailed requirements such as on data definitions (note that “nameplate capacity” is far from the complete picture), timeliness, accuracy and so on;
 - b. whether, from whom, and on what basis distributors are able to collect the data;
 - c. under what circumstances the data needs to be updated, eg if an operator upgrades a DG installation;
 - d. from whom and on what basis distributors would source updated data; and
 - e. the consequences of having inaccurate or incomplete data (for whatever reason).
10. Vector would like assurance from the Authority that the size of the proposed additional fields would be sufficient to hold all the information that is required to be recorded.

Contact details

11. If the Authority has any queries regarding Vector’s submission or would like further information please contact Robert Allen, Senior Regulatory Advisor, on 04 803 9036 or robert.allen@vector.co.nz.

Kind regards



Bruce Girdwood

Manager Regulatory Affairs