



31 May 2012

Submissions  
Electricity Authority  
By email: [submissions@ea.govt.nz](mailto:submissions@ea.govt.nz)

### **Proposed Changes to the Registry ICP Switching Process**

Meridian welcomes the opportunity to submit on the Authority's consultation paper 'Proposed Changes to the Registry ICP Switching Process'.

Specific responses to the individual consultation questions are included in Appendix 1. Meridian notes that some of the timings listed in the left hand column of Figure 1 (page 5 of the consultation paper) do not appear to match what is displayed on the Gantt chart (e.g. trader verification and correction of metering data). Meridian suggests the Authority review the chart.

If you have any queries regarding this submission please contact me.

Yours sincerely,

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## Appendix 1: Responses to consultation questions

No.	Question	Response
Q1.	Do you agree that the switch moratorium should be reduced to as short a period as possible? Please give reasons.	Meridian agrees that the switch moratorium should be reduced to as short a period as possible, although we note that the high level of switching in the current environment means that shortening the period could increase the risk of technical or process problems.
Q2.	Do you agree that the CS/RR switch messages should be introduced to replace the TN/TT switch messages? Please give reasons for your answer.	<p>Meridian is comfortable with the introduction of the CS/RR switch messages.</p> <p>We note that paragraph 5.3.1 of the consultation paper refers to a gaining or losing trader being able to initiate a change in switch read, but Appendix B specifies “for RR messages it is submitted by the gaining trader to the registry”. Meridian seeks the Authority’s clarification on whether an RR file can be submitted by either a gaining or a losing trader.</p>
Q3.	Do you agree with the proposed CS file structure? Are there alternatives that should have been considered? Please give reasons.	Meridian broadly agrees with the CS file structure, noting the comments below.
Q4.	Is there any additional information that should be provided in the proposed CS/RR switch message? Please give reasons.	<p>No information appears to be provided on unmetered load sites. Meridian questions how switching of such sites will occur.</p> <p>No data is provided on average daily consumption. Meridian is intending to use this data. We recommend that it is added.</p>
Q5.	Do you agree that the metering installation information in the event detail report provided with each CS switch completion should be automatically generated for all switches or should it be optional? Please give reasons.	Meridian supports automatic generation of the metering installation information as proposed by the Authority. Automatic generation will ensure ready availability of the appropriate information.
Q6.	Do you agree with the replacement of the current switch types S, SM, H, HM, HN and NH – with two new types – Move In switch (MI) and Standard Trader Switch (TR)?	Meridian supports reduction of the current switch types.

No.	Question	Response
Q7.	Do you agree with the costs and benefits? If not, can you provide estimated values for the costs and benefits of the proposed introduction of the new CS file and the reduction in the duration of the switch moratorium? Please refer to paragraph 2.2.3 in the main consultation paper if this information is confidential.	No comment.