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RAG review of secondary networks

The Electricity Networks Association (ENA) appreciates the opportunity to comment on the Retail Advisory Group paper “Review of secondary networks – issues and options” (the paper). The ENA represents the 29 network businesses in New Zealand and makes this submission with their explicit support. The ENA’s view is that the paper does not identify any material issues that warrant further investigation by the Authority or its working groups.

The ENA notes that there are a limited number of consumers served by embedded networks and network extensions. Customer networks are a practical commercial solution and issues that may arise between end-users and the site owner or operator should be resolved through the relationship between these two parties (for example a lease) rather than regulation of the electricity sector.

While ENA members do observe examples of some of the issues highlighted in the paper, it is our view that changes to internal processes, such as customer fault handling systems, can resolve these issues or clarify existing processes for customers. It is appropriate to work through the issues at individual network level because they are location specific rather than systemic, and the number of customers involved is relatively small.

Should you require further information or wish to discuss our response, our contact person for this submission is

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Yours sincerely

Graeme Peters

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