

Electricity Authority
Level 7
ASB Bank Tower
2 Hunter St
Wellington

Via email: submissions@ea.govt.nz

13 August 2015

Code Review Programme 2015

Thank you for the opportunity to comment on the 'Code Review Programme 2015' consultation paper. The Powershop submission is included in Appendix 1.

Please contact me if you have any questions about this submission.

Yours sincerely



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Appendix 1: Powershop Submission

Reference number for amendment you are submitting on:	046-011
Question 1: Do you agree with the Authority's problem definition? If not, please provide comments.	
No, Powershop does not agree that the terms "meter", "data storage device", and "load control device" are too broad, and believes the fields currently specified as "required" in Table 1 of Schedule 11.4 are appropriate.	
Question 2: Do you agree with the Authority's proposed solution? If not, please provide comments.	
Powershop believes the Load Control devices are an important piece of information that retailers and distributors use to determine eligibility for pricing plans. It is also useful for EA auditors to validate the data loaded by MEPs e.g. an IN or CN registry should be accompanied with a load control device. The Load Control device information is also vital for validation when a trader is using the controlled load for profiling in submission information.	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
Powershop does not agree that a Code amendment is necessary.	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	
No comment	
Question 5: Do you agree the benefits of the proposed amendment outweigh its costs?	
No comment	
Question 6: 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.	
No, the status quo is preferable	

Reference number for amendment you are submitting on:	051-016
Question 1: Do you agree with the Authority's problem definition? If not, please provide comments.	
No, Powershop does not agree that a problem exists	
Question 2: Do you agree with the Authority's proposed solution? If not, please provide comments.	
No, Powershop believes that parties should not be required to re-agree to use an alternative format each time a new EIEP is published.	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
Powershop does not agree that a Code amendment is necessary.	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	
No, Powershop believes that requiring parties to re-agree to use an alternative format each time a new EIEP is published is not an "efficient operation". The justification for any "promotion of competition" is also absent from the proposal	
Question 5: Do you agree the benefits of the proposed amendment outweigh its costs?	
No comment	
Question 6: 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.	
No, the status quo is preferable	

Reference number for amendment you are submitting on:	071-019
Question 1: Do you agree with the Authority's problem definition? If not, please provide comments.	
Yes	
Question 2: Do you agree with the Authority's proposed solution? If not, please provide comments.	
No, Powershop believes that this solution does not consider new reconciliation participants that may enter the market by acquiring an established customer base from an existing participant(s). These new reconciliation participants could acquire enough ICPs/volume to have material impact on market settlement. The solution should be limited to an amount of ICPs and/or volume that the EA deems to be material.	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
See above	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	
No comment	
Question 5: Do you agree the benefits of the proposed amendment outweigh its costs?	
No comment	
Question 6: 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.	
No comment	

Reference number for amendment you are submitting on:	083-025
Question 1: Do you agree with the Authority's problem definition? If not, please provide comments.	
<p>No, Powershop does not believe widespread confusion exists as until recently this has never been raised as an issue in EA fora or as a non-compliance in Powershop's annual EA audits.</p> <p>Powershop believes that the term "electricity supplied" does not, and should not, include vacant ICP volumes. The current definition of electricity supplied specifically states that it is only for "quantities of electricity supplied...to consumers". Powershop is unsure how this clear definition can cause confusion.</p> <p>The filename of AV-120 is "BILLED" which speaks to the original intent of the definition. The RM functional specification supports this intent by stating that "<i>the reconciliation manager receives details of the electricity supplied and billed i.e invoiced by a retailer to its customers during the previous consumption period per NSP</i>". An ICP without a customer does not have its volume "invoiced" to a customer.</p>	
Question 2: Do you agree with the Authority's proposed solution? If not, please provide comments.	
<p>No, Powershop does not believe a Code amendment is necessary and takes issue with the comment that it will have "no impact on current practice" as implementation of this change will require moderately sized system changes at Powershop.</p>	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
<p>No, Powershop does not believe a Code amendment is necessary</p>	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	
<p>N/A</p>	
Question 5: Do you agree the benefits of the proposed amendment outweigh its costs?	
<p>N/A</p>	
Question 6: 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>N/A</p>	