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### **Code Review Programme 2015**

1. Vector Limited (Vector) provides the following feedback on the Electricity Authority's (the Authority) consultation paper *Code Review Programme 2015* (the paper), dated 30 June 2015. No part of this submission is confidential.
2. Vector's contact person for this submission is:  
Sally Ma  
Regulatory Specialist  
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3. Vector supports the Authority's Code review programme, and its efforts towards making continued improvements to the Code. The Code is not a light document and depending on the industry participant, several parts of the Code may apply. The more rules a participant must adhere to, the more resources it requires to ensure compliance. Therefore, it is important to regularly review areas of the Code that the Authority and/or the industry considers do not appropriately or adequately reflect the intention of the Authority, or industry practice.
4. Ambiguity and uncertainty of rules that govern the operations of an industry as multifaceted as the electricity market, can be costly for each party involved – including the regulator who must oversee and investigate potential non-compliances, and consumers who do not benefit from inefficiencies or unnecessary costs. However, numerous small changes over the course of year would also contribute to inefficiencies.
5. To this end, Vector supports an annual "omnibus" Code amendment as an ongoing work stream. If this is implemented as a regular work item not only would it provide a useful and low cost channel for efficiencies to be made, but it would also help to encourage industry participants to pro-actively put forward Code amendment proposals if they know in advance that an omnibus amendment may provide for the change. We do, however, submit that

significant changes, or those that are likely to be controversial, should be addressed separately from the omnibus process.

6. Vector's comments on selected Code amendment proposals are set out in the table under Appendix A, where we provide comments as both a distributor and metering equipment provider (MEP). We would be happy to discuss our points further, please do not hesitate to contact me (details above).
7. We ask that the Authority give the industry sufficient notice of when it intends to make any Code amendments, and sufficient time to make any required changes to its operations or agreements once the amendments come into force. For example, Use-of-Systems Agreements (UoSA) reference clauses under Part 12A of the Code. Therefore, any changes to the numbering of clauses will also require updating the UoSA.

Yours sincerely  
For and on behalf of Vector Limited

A handwritten signature in blue ink, appearing to be 'Sally Ma', written in a cursive style.

Sally Ma  
**Regulatory Specialist**

**APPENDIX A: Vector’s comments on the Authority’s proposed Code amendments<sup>1</sup>**

Ref	Subject	Vector Comment
045A-040	Settlement indicator registry records Table 1 of Schedule 11.4	<p>Vector supports the intention of this proposal, where it removes the requirement for a trader to submit data from a cumulative register when they are reconciling as HHR.</p> <p>However, it is unclear if (a) (i.e. row 30 of Table 1) refers to singular or plural channels. If plural, it could be that one of the channels may not be required for reconciliation, in which case they should remain “N”. I.e. the flag should identify which channels are required for reconciliation purposes and if they are not required they should remain “N”.</p>
084-003	Definition of “UoSA” and event of default Clause 14.41(h)	<p>Vector supports the amendment to explicitly include reference to embedded networks under the definition of “Use of systems agreement” (UoSA). We also support that reference to an embedded networks’ UoSA is reflected and included in Part 12A, and the event of default provisions under Part 14.</p> <p>However, the words “or embedded network”, proposed in the summary of amendment on page 24 to be added to clause 14.41, have been omitted from the Master List of amendments in Appendix D. Vector <b>recommends</b> the Authority correct this error before finalising its proposal.</p>
<p>Vector supports and agrees with the Authority’s rationale for the following proposals:</p> <ul style="list-style-type: none"> <li>• 028-037: Category 1 MI inspections</li> <li>• 027-036: Maximum interrogation cycle</li> <li>• 025-035: Modification of MIs</li> <li>• 024-034: Metering records</li> <li>• 087-009: Recertification requirements for installation of meters</li> <li>• 079-008: Measurement of reactive energy on Category 2 MIs</li> <li>• 008-002: Definition of “embedded network”</li> <li>• 093-014: Indemnity under the Code</li> <li>• 007-024: Definition of “distributor”.</li> </ul>		

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<sup>1</sup> Vector has not provided feedback on all of the Authority’s proposed items (49 in total). We have provided feedback where we consider there is merit in Vector Limited – as a distributor and MEP (AMS) – providing comments and / or support.