



23 August 2016

Submissions
WAG Chair
Level 7, ASB Tower
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Wellington

By email: wag@ea.govt.nz

Dear John

Wholesale Market Information Disclosure: review of disclosure exclusions

We welcome the opportunity to comment on the Wholesale Advisory Group (WAG) discussion paper *Review of Disclosure Exclusions*, published 28 June 2016.

This submission covers the WAG proposals for possible stand-alone market facilitation measures, aimed to enhance disclosure outcomes through the Planned Outage Co-ordination Protocol (POCP) managed by the System Operator.

Role of POCP

As the WAG identifies¹, in 2013 we amended the POCP to enable open access so that the asset outage information held there met the “readily available to the public” test of the Wholesale Market Information (WMI) disclosure obligations. This public face may have encouraged parties to view the outage co-ordination tool as the means to satisfy obligations for and access to WMI disclosures, thereby expanding its specific role for the co-ordination of outages affecting common quality under Technical Code D of part 8. In this review, the WAG makes four suggestions for facilitation measures around the POCP:

- 1) include more specific guidance for participants using the system operator’s POCP platform for meeting their clause 13.2 WMI
- 2) encourage better and/or more consistent use of the ‘tentative’ flag for outages posted in POCP
- 3) encourage direct consumer participants and gas facility owners to make better use of POCP for outages

¹ WAG discussion paper page 44

- 4) investigate providing in POCP access to information from OATIS (the Open Access Transmission Information System for gas), ideally through an automated process.

We support the first two measures and would be happy to assist with these developments in collaboration with participants and the Authority. We consider that creating consistency around the use of the 'tentative' flag should improve accuracy of and confidence in the outage information, but work will be needed to understand and align the use of the term by participants with their own outage management policies. We consider the guidelines would be an appropriate place to specify this emerging 'flag' policy.

In 2014 – 15 we made further enhancements to the POCP to enable increased information sharing between participants about asset outages, but consider the existing functionality is still straightforward, reliable and low cost to manage. However, the last two measures proposed would be major changes to the POCP purpose that would seem to transform the POCP platform into a broader market information disclosure vehicle. We would wish this expansion in scope, complexity and likely running cost to be tested for desirability and do-ability via the participants' working group that supports the platform.

If you have any questions about this submission please don't hesitate to contact me.

Yours sincerely



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