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3rd October 2017

John Rampton
General Manager Market Design
Electricity Authority

By email: submissions@ea.govt.nz

Dear John

Wholesale Market Information Disclosure

We welcome the opportunity to respond to the Authority's consultation on *Wholesale Market Information disclosure*, published 8 August 2017.

This brief submission discusses how asset owners and the system operator can meet obligations for planned outage information under Part 8¹ by efficient use of the existing planned outage co-ordination protocol (POCP).

The consultation paper explains "asset owners using the POCP platform notify the system operator by logging into the POCP platform and entering the planned outage information directly. The information is then visible, and thus publicly available, without further action by either the asset owner or the system operator."²

The paper also states the Authority and the system operator "encourage asset owners to use the POCP platform to meet their Technical Code D planned outage notification obligations, as it provides a timely, efficient and standardised process for planned outage co-ordinating and publication."³

We would prefer that asset owners respond to encouragement to use POCP. However, we are concerned by the view noted from the September workshop:⁴

*"it might be useful if the system operator was given user access so it could include outages notified to it by email."*⁵

We strongly disagree with the suggestion that the planned outage information could be improved if the system operator has user access so it could input planned outages notified by email. The suggestion would create double handling, which is inefficient.

¹ Part 8 Schedule Technical Code D clauses 3 and 6

² Section 10.13 consultation paper

³ Section 10.14 consultation paper

⁴ Workshop: *Review of the wholesale market information (WMI) disclosure regime 12/9/2017*
<https://www.ea.govt.nz/development/work-programme/risk-management/wholesale-market-information-clause-13-2-and-fuel/events/workshop-on-review-of-wholesale-market-information-disclosure-regime/>

⁵ Workshop summary notes page 6: *Review of the wholesale market information (WMI) disclosure regime 12/9/2017*. <https://www.ea.govt.nz/development/work-programme/risk-management/wholesale-market-information-clause-13-2-and-fuel/events/workshop-on-review-of-wholesale-market-information-disclosure-regime/>

Although an asset owner may technically have met its obligation by sending an email to the system operator, the more efficient practice by most industry participants is direct input of their information to POCP. Double handling would also add to the time taken to convey information to POCP, reducing timely disclosure.

We consider inefficient and un-transparent outage notification practice could potentially have negative impacts for competition.

If inefficient notification remains, then we would support an alternative approach to mandating a single repository for all asset owner planned outage information.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Catherine Jones', with a stylized flourish at the end.

Catherine Jones

Regulatory Affairs and Pricing Manager