

networktasman

Your consumer-owned electricity distributor

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Submissions

c/- Electricity Authority

PO Box 10041

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By email: submissions@ea.govt.nz

Submission on the Code Review 2018 Consultation

Network Tasman Limited welcomes the opportunity to provide comment on the Authority's Code Review Programme 2018 consultation paper, published in January 2018. Our submissions (attached) cover two amendments relating to:

- Timeframe for distributors to give written notice of ICP decommissioning (2018-02); and
- Clarifying Code requirements for ICP information relating to chargeable capacity (2018-07).

We would be happy to further engage with the Authority to discuss the issues addressed in our submissions, or to provide additional clarification of our views.

Yours sincerely,

Network Tasman Limited



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Reference	2018 – 02: Timeframe for distributors to give written notice of ICP decommissioning
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
<p>Agree.</p> <p>Decommissions on Network Tasman’s network are typically completed on the same day, so we are rarely able to comply with current timeframes, due to retailer delays.</p>	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
Yes	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
No	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	
Yes	
Question 5: Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?	
<p>Yes, the costs would be minimal.</p> <p>The primary benefit is that a distributor will not be forced to breach the code.</p>	
Question 6: Do you agree the proposed amendment is preferable to the other options? If not, please explain your preferred option in terms consistent with the Authority’s statutory objective in section 15 of the Electricity Industry Act 2010.	
Yes. This appears to be the only real solution.	

Reference	2018 – 07: Clarifying Code requirements for ICP information relating to chargeable capacity
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Yes	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
<p>No.</p> <p>The solution assumes that only one capacity figure applies for an ICP that has capacity charges. In our case there is a category of ICP (with 4 subcategories) that has two capacity charges: (1) a kVA capacity charge (Customer Demand) that reflects mainly the capacity use of the distribution network; (2) and a kW capacity (Network Demand) related to Transpower's Interconnection charge, in kW. This applies to about 150 ICPs, our larger connections.</p> <p>The existing Capacity field is numeric, and does not appear able to accommodate multiple chargeable capacities.</p>	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
<p>We suggest that where ICPs have more complex fixed/capacity charges, that these be disclosed in the free-form field so Traders can reference that rather than contacting the distributor when a switch occurs, as is the case for the 150 or so ICPs above.</p>	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	
Yes	
Question 5: Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?	
As the proposal stands, no.	
Question 6: Do you agree the proposed amendment is preferable to the other options? If not, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010.	
See Q3. In addition, as Distribution pricing develops and becomes more complex, there may be multiple fixed/capacity fields required to be added where the unit type (kW / kVA)	