

Reference	2018 - 01
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?	
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?	
Yes	

**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.**

Code review programme 2018

Nova Energy submission, Paul Baker, Commercial & Regulatory Manager

Reference	2018 - 11
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
<p>'The Authority proposes to amend the Code as follows: 1) amend clause 2(1)(b) of Schedule 15.3 to require submission information for all category 1 metering installations or category 2 metering installations at an ICP, rather than allowing the reconciliation participant to choose whether to provide either half hour or non-half hour volume information in situations where there is both.'</p>	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
<p>No.</p> <p>It is not clear in the proposed revision that this only covers situations where there is both NHH and HHR metering data available</p> <ol style="list-style-type: none">1. Is it intended to close the option of submitting NHH data for reconciliation purposes when the site has HHR metering? If so this is not adequately explained or justified. Such change would be significant and should be debated.2. Volume information is not provided with submission types to the Reconciliation Manager. Volume information is provided for submission types, as the submission type is used to determine whether the ICP is provided as NHH or HHR to the Reconciliation Manager, but the submission type itself is not included in the file.	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	

Nova Energy submission

Reference	2018 - 20
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?	
Yes, but currently we don't have the technology to automatically generate a reject file. We are happy to once we are able to. Perhaps 12 months' notice before implementation?	
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?**

Yes

**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

Reference	2018 - 21
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
No. The problem definition is confusing.	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
In all cases no installation shall be decommissioned until the MEP confirms: Meter removal, de-energisation, final interrogation and provides said final interrogation to traders.	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	

**Question 5: Do you agree the benefits of the proposed amendment outweigh its costs?
If not, why not?**

**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.**