

6 March 2018

Submissions
Electricity Authority
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UNISON SUBMISSION – CODE REVIEW PROGRAMME 2018

Introduction

Unison welcomes the opportunity to provide a submission to the Electricity Authority (the Authority) on the consultation paper, *Code Review Programme 2018*. Our responses to two Code amendment proposals are set out below.

Unison’s Submission on Proposed Code Amendments

(a) 2018-02 Timeframe for distributors to give written notice of ICP decommissioning

Unison agrees with the problem definition for this Code amendment. The Code, as it is currently drafted, means that distributors are sometimes unable to meet the three-day timeframe due to traders being allowed up to five days to update the registry. This is an issue Unison has experienced first-hand, with non-compliance with this clause being identified in our most recent distributor audit (due to late information from traders). Unison agrees with the Authority’s Code amendment as set out in the consultation paper which ensures that distributors are not unfairly penalised for varying timeframe obligations between distributors and traders.

(b) 2018-14 Clarifying requirement for distributors to give written notice of change to network supply point identifier

Unison agrees with the Authority that the Code as it is currently drafted under clause 8(3) is not as clear as it could be, both in terms of the actual date of the change and of the timeframe to update the registry with the change in NSP details. We have previously raised concerns with the Authority regarding this clause (in 2015) and requested a Code amendment¹. While the Authority did not agree with our proposed Code amendment, they did agree that the clause needed to be amended to provide clarity around timeliness and accuracy.

In response to Unison’s Code change proposal, the Authority suggested amending the Code to:

“revoke clause 8(4) of Schedule 11.1 and replace clause 8(2)(a) with:

¹ Unison (29 June 2015). *Proposal to amend the Electricity Industry Participation Code 2010*.

"8(2)(a) In the case of a change to information referred to in clause 7(1)(b) (other than a change that is the result of a decommissioning of an NSP), no later than 18 business days after the change takes effect;"²

Unison considers that the above Code drafting is superior to the current proposal as it reduces the complexity of the clause. We have therefore suggested alternative Code drafting below, in line with the Authority's original feedback to us. Further, we believe the Authority should retain the current 18 business day timeframe, rather than reduce it to 13. We submit that the Authority consider re-drafting this section to the following:

8 Distributors to change ICP information provided to registry manager

- (1) *If information about an ICP provided to the registry manager in accordance with clause 7 changes, the distributor in whose network the ICP is located must give written notice to the registry manager of the change.*
- (2) *The distributor must give the notice—*
 - (a) *in the case of a change to the information referred to in clause 7(1)(b) (other than a change that is the result of the commissioning or decommissioning of an NSP), no later than 18 8 business days after the change takes effect, including in the notice the date the change occurred; and*
 - (b) *in every other case, no later than 3 business days after the change takes effect.*
- (3) *A distributor is not required to give written notice of a change of information provided in accordance with clause 7(1)(b) if the change is for less than 10 business days 44 days.*
- ~~(4) *If a change of information provided in accordance with clause 7(1)(b) is for more than 14 days, subclause (2) applies as if the change had taken effect on the 15th day after the change takes effect.*~~

Unison also notes that our request for a Code amendment relating to price category code changes³ has not been included in the 2018 Code Omnibus. We have brought this to the attention of the Authority and have been advised that amendments relating to this proposal will be consulted on as part of another paper being in the second half of 2018.

Finally, Unison is concerned that there are ongoing amendments being made to the Code that in sum are adding complexity rather than making the Code easier to understand. We submit that the Authority consider undertaking a wider Code review with the aim of simplifying the requirements on participants. For any questions relating to this submission, please contact Roanna Vining, Senior Regulatory Affairs Advisor, by phone (06) 873 9329 or email Roanna.Vining@unison.co.nz.

Yours sincerely,



Nathan Strong
GENERAL MANAGER, BUSINESS ASSURANCE

² Electricity Authority (29 September 2015). *Assessment Form: Switching ICPs within the same balancing area – exception from Clause 8 of Schedule 11.1.*

³ Unison (21 September 2015). *Proposal to Amend the Electricity Industry Participation Code 2010.*