

6 March 2018

Electricity Authority  
Level 7, ASB Bank Tower  
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## Submission on the Code Review Programme 2018

### Introduction

1. This is Vector Limited's (Vector) submission on the Electricity Authority's (the Authority) consultation paper on its omnibus *Code Review Programme 2018*, dated 16 January 2018.
2. We set out below our responses to questions in the consultation paper that are of relevance or interest to Vector businesses.
3. No part of this submission is confidential. Vector's contact person for this submission is:

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Senior Regulatory Specialist  
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### Responses to selected consultation questions

#### 2018-02 Timeframe for distributors to give written notice of ICP decommissioning

4. We agree with the Authority's proposal to require a distributor to provide the registry manager written notice of having decommissioned an ICP by the later of: 3 business days after the registry manager has advised the distributor that an ICP is ready for decommissioning, and 3 business days after the distributor has decommissioned the ICP.

#### 2018-10 Requirement to have an arrangement with a customer or embedded generator at an ICP before commencing the switch process

5. We agree with this proposed requirement.

#### 2018-20 Shorter timeframes for gaining metering equipment provider (MEP) to receive and provide notifications

6. We strongly agree with this proposed requirement and solution.

7. Late nominations to MEPs have been a source of major frustration for our metering business since the commencement of Part 10 of the *Electricity Industry Participation Code 2010* (the Code). This has resulted in regular audit breaches, which require the time-consuming process of following up nominations.

2018-21 Decommissioning a metering installation

8. We agree with the Authority's proposed Code amendments to clarify the process of decommissioning a metering installation.

2018-22 Clarifying when a reconciliation participant may connect or electrically connect certain points of connection

9. We agree with the Authority's proposed amendments clarifying when a reconciliation participant may connect or electrically connect certain points of connection. We agree that these amendments would significantly address issues (such as confusion and higher risk of unaccounted for electricity) created by the relevant clauses, as currently worded.

Yours sincerely

For and on behalf of Vector Limited

A handwritten signature in blue ink, appearing to read "Richard Sharp".

**Richard Sharp**

Head of Regulatory and Pricing