

6 March 2018

Submissions  
Electricity Authority  
PO Box 10041  
**WELLINGTON 6143**

Dear Authority,

**Re: Code Review Programme**

Please find Contact's views set out in the tables from page two.

Should you have any questions please don't hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Louise Griffin', written in a cursive style.

Louise Griffin  
**Head of Regulatory Affairs and Government Relations**

Reference	<b>2018-01 Clarifying requirement to update registry metering records</b>
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
Agree	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
Agree	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
No	
<b>Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?</b>	
Yes	
<b>Question 5: Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?</b>	
Yes	
<b>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.</b>	
Yes	

Reference	<b>2018-02 Timeframe for distributors to give written notice of ICP decommissioning</b>
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
Agree	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
Agree	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
No	
<b>Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?</b>	
Yes	
<b>Question 5: Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?</b>	
Yes	
<b>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.</b>	
Yes	

Reference	<b>2018-03 Clarifying the scope of an appeal under clause 8.36</b>
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
Yes.	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
Yes.	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
No.	
<b>Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?</b>	
Yes.	
<b>Question 5: Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?</b>	
Yes.	
<b>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.</b>	
Yes.	

Reference	<b>2018-04 Clarifying when losing trader must respond to switch move request</b>
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
Agree	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
<p>Contact considers this Code amendment should be referred to the Switching Technical Group (STG).</p> <p>The STG are already considering changes to the switching process and timeframes which may result in this particular amendment being redundant. Implementing this change as a minor Code amendment has the potential to require Traders to change switching processes and systems.</p> <p>Contact's preference would be for the STG to assess the problem, identify the most practical solution and implement a single Code and system change (if required) as opposed to potentially changing systems and processes twice.</p>	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
As per question 2, this item should be assessed by the STG.	
<b>Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?</b>	
Yes, however please see our comments above.	
<b>Question 5: Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?</b>	
Yes, however please see our comments above.	
<b>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.</b>	
No, Contact considers this needs to be assessed by the STG to ensure the Code and associated processes aren't potentially changed twice in short succession.	

Reference	<b>2018-05 Block dispatch agreement notification</b>
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
Yes.	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
Yes.	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
No.	
<b>Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?</b>	
Yes.	
<b>Question 5: Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?</b>	
Yes.	
<b>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.</b>	
Yes.	

Reference	<b>2018-06 Amending or rescinding an approved shorter post default exit period</b>
<p><b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b></p> <p>If the end result is that a higher level of prudential security is likely, that's a good thing as it will improve the credit risk involved with electricity market settlements overall.</p>	
<p><b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b></p> <p>No comment.</p>	
<p><b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b></p> <p>No comment.</p>	
<p><b>Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?</b></p> <p>No comment.</p>	
<p><b>Question 5: Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?</b></p> <p>No comment.</p>	
<p><b>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.</b></p> <p>No comment.</p>	

Reference	<b>2018-07 clarifying code requirements for ICP information relating to chargeable capacity</b>
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
Yes.	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
Yes.	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
Contact has no issue with the proposed Code drafting. However, we hope there is no unintended consequence of distributors delaying the initial population of the pricing event for a new connection and subsequent update of the status event from 'new' to 'ready' as a result of distributors seeking some certainty over what should be the capacity value at the time of an ICP energisation.	
<b>Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?</b>	
Yes.	
<b>Question 5: Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?</b>	
Yes.	
<b>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.</b>	
Yes.	



Reference	<b>2018-08 Amending the timeframe for the clearing manager to calculate constrained off/on amounts</b>
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
Yes.	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
Yes.	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
No.	
<b>Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?</b>	
No comment.	
<b>Question 5: Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?</b>	
No comment.	
<b>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.</b>	
No comment.	

Reference	<b>2018-09 Calculation of switching event dates</b>
<p><b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b></p> <p>Yes.</p>	
<p><b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b></p> <p>Contact considers this Code amendment should be referred to the Switching Technical Group (STG).</p> <p>The STG are already considering changes to the switching process and timeframes which may result in this particular amendment being redundant. Implementing this change as a minor Code amendment has the potential to require Traders to change switching processes and systems.</p> <p>Contacts preference would be for the STG to assess the problem, identify the most practical solution and implement a single Code and system change (if required) as opposed to potentially changing systems and processes twice.</p>	
<p><b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b></p> <p>As per question two, this item should be assessed by the STG.</p>	
<p><b>Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?</b></p> <p>Yes, however please see our earlier comments regarding the STG.</p>	
<p><b>Question 5: Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?</b></p> <p>Yes, however please see our earlier comments regarding the STG.</p>	
<p><b>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.</b></p> <p>No, Contact considers this needs to be assessed by the STG to ensure the Code and associated processes aren't potentially changed twice in short succession.</p>	

Reference	<b>2018-10 Requirement to have an arrangement with a customer or embedded generator at an ICP before commencing the switch process</b>
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
Yes.	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
Yes.	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
No.	
<b>Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?</b>	
Yes.	
<b>Question 5: Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?</b>	
Yes.	
<b>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.</b>	
Yes.	

Reference	<b>2018-11 Providing submission information to the reconciliation manager</b>
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
Yes.	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
Yes.	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
<p>Contact has concerns that the wording still does not recognise Meter Installation Category 3 – 5 where unmetered load is present. Contact has previously had a small number of Cat 3 LV ICPs with this configuration.</p> <p>In these instances the UML should be submitted as NHH volumes however the code is silent on this requirement in its current format.</p>	
<b>Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?</b>	
Yes.	
<b>Question 5: Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?</b>	
Yes.	
<b>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.</b>	
Yes.	

Reference	<b>2018-13 Timeframe for completing switch event meter reading disputes</b>
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
Yes.	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
<p>Contact considers the proposed amendment to be sensible, however we also think that changes outside of this timeframe, particularly switch event meter reading errors that result in significant financial and reconciliation impacts, should still be allowed under the Code so long as both traders agree.</p> <p>Contact believes that a clause including the right to accept switch event meter reading errors outside of the four month time frame should be added in exceptional circumstances to allow traders to submit switch event meter reading changes outside of the four month timeframe. Exceptional circumstances would include where the change is taking place due to one of the following reasons:</p> <ul style="list-style-type: none"> <li>• there is significant financial impact to a customer if the switch event meter reading isn't changed; or</li> <li>• there is a significant impact to the reconciliation process.</li> </ul>	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
As above, Contact considers some thought needs to be given to cases where accuracy of customer billing and energy settlement requires switch event meter reading changes to occur outside of the standard four month timeframe.	
<b>Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?</b>	
Yes.	
<b>Question 5: Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?</b>	
Yes.	
<b>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.</b>	
Yes.	

Reference	<b>2018-14 Clarifying requirement for distributors to give written notice of change to network supply point identifier</b>
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
Yes.	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
Yes.	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
No.	
<b>Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?</b>	
Yes.	
<b>Question 5: Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?</b>	
Yes.	
<b>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.</b>	
Yes.	

Reference	<b>2018-15 Clarifying clauses 19,21 and 22 of Schedule 15.2</b>
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
Yes.	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
Yes.	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
Contact recommends the proposed changes be extended to also cover half hour readings / interval data (Clause 17) and in particular estimating / revision of interval data up to a permanent estimate reading such as a switch loss estimate.	
<b>Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?</b>	
Yes.	
<b>Question 5: Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?</b>	
Yes.	
<b>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.</b>	
Yes.	

Reference	<b>2018-16 Switching ICPs with category 3 or higher metering installations that have advanced metering infrastructure (AMI) components</b>
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
<p>No Contact does not agree with the problem statement.</p> <p>While CT meters may be able to be interrogated by a MEP or their agents back office data collection platform that also reads AMI whole current meters – we believe this does not qualify category 3 or higher CT metered installations as AMI. No switch read is required to be provided nor can the CT meter perform any smart services such as remote disconnection / reconnection / load limiting functions that would usually be expected of an AMI device.</p> <p>Contact believes the same outcome could be achieved by applying a validation within the registry to explicitly prevent the AMI flag being applied to category 3 or higher CT metered installations.</p>	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
<p>Contact considers this Code amendment should be referred to the Switching Technical Group (STG).</p> <p>The STG are already considering changes to the switching process and timeframes which may result in this particular amendment being redundant. Implementing this change as a minor Code amendment has the potential to require traders to change switching processes and systems.</p> <p>Contact's preference would be for the STG to assess the problem, identify the most practical solution and implement a single Code and system change (if required) as opposed to potentially changing systems and processes twice.</p>	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
<p>As per our response to question two, this item should be assessed by the STG.</p>	
<b>Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?</b>	
<p>Yes, however consider this needs a wider view as is being considered by the STG.</p>	
<b>Question 5: Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?</b>	
<p>Yes, however consider this needs a wider view as is being considered by the STG.</p>	
<b>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.</b>	
<p>No, Contact considers this needs to be assessed by the STG to ensure the Code and associated processes aren't potentially changed twice in short succession.</p>	



Reference	<b>2018–17 Removing the defined term “customer” from Part 1</b>
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
<p>No. Apart from the use of “customer” in the definition of “distributed unmetered load” (where it is mistakenly bolded), the use of the term “customer” <b>in bold</b> (i.e. where “customer” means a person who purchases, or has agreed to purchase, electricity from a retailer at a specific ICP) is relevant and correct. The confusion therefore arises where the word “customer” is written in bold and not in bold making it difficult for some to understand when to use the defined term (in bold) and when to use the common English term (i.e. “electricity customer”) when not in bold.</p>	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
<p>The proposed solution resolves an incorrect definition of the problem, and the problem definition proposed in Question one above.</p>	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
<p>No.</p>	
<b>Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?</b>	
<p>Yes.</p>	
<b>Question 5: Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?</b>	
<p>Yes.</p>	
<b>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.</b>	
<p>Yes.</p>	

Reference	<b>2018-19 Making volume information permanent</b>
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
Yes.	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
Yes.	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
No.	
<b>Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?</b>	
Yes.	
<b>Question 5: Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?</b>	
Yes.	
<b>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.</b>	
<p>Has the Authority considered allowing both gaining and losing traders of an ICP to pause the switch process to require a customer to provide access to enable an actual meter read to be retrieved and allow the switch to be completed? Given the small number of affected ICPs this is not expected to be a barrier to completion or switching but rather is an opportunity to resolve long standing access issues when the customer is actively engaged with traders during the switching process.</p>	

Reference	<b>2018-20 Shorter timeframes for gaining metering equipment provider (MEP) to receive and provide notifications</b>
<p><b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b></p> <p>Contact considers the proposed change to mandate that traders must provide advance notice of an MEP notification to the registry to be against the core purpose of the registry.</p> <p>The registry is considered a database of record as opposed to a service order or workflow tool which is where this particular amendment looks to be heading. All other registry maintenance interfaces contain information or records that have been confirmed after an event has occurred. By introducing a forward or future notification process it could introduce unconfirmed or inaccurate information in the registry that would require manual intervention for no significant benefit.</p> <p>Contact considers that if timeliness of updates is a potential issue then the registry functionality could be amended to enable MEPs to populate metering information prior to trader notification. It is unlikely that MEPs would knowingly or incorrectly populate metering information where they are not responsible for the metering installation at an ICP. This could also be validated when the trader populates the MEP if this is not done prior to the MEP populating the metering information.</p> <p>The proposal within 2018-20 also requires that gaining MEPs must have an arrangement with a Trader which would potentially now enable registry updates to take place without explicit acceptance of MEP responsibility.</p>	
<p><b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b></p> <p>As outlined in response to question one, Contact believes that there are alternative solutions that will enable MEPs to populate registry metering information in a timely manner without the need for forward notifications.</p>	
<p><b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b></p> <p>No.</p>	
<p><b>Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?</b></p> <p>Contact can see some benefit in the reduction of time taken for MEPs' information to be populated in the registry, however this can be enabled through alternative solutions as opposed to introducing what could be considered as a workflow or service order process to the registry.</p>	
<p><b>Question 5: Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?</b></p> <p>Contact considers that the costs associated with system changes have been significantly underestimated. The costs to change Contact's systems to incorporate the proposed changes would outweigh the benefits of the proposed amendment.</p>	
<p><b>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.</b></p> <p>As outlined earlier, Contact considers there are alternative solutions that will provide a wider benefit if MEPs can update registry metering records without Trader notifications.</p>	

Reference	<b>2018-21 Decommissioning a metering installation</b>
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
Yes.	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
Yes.	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
No.	
<b>Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?</b>	
Yes.	
<b>Question 5: Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?</b>	
Yes.	
<b>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.</b>	
Yes.	

Reference	<b>2018-22 Clarifying when a reconciliation participant may connect or electrically connect certain points of connection</b>
<p><b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b></p> <p>Yes.</p>	
<p><b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b></p> <p>No. Contact disagrees with the proposed changes relating to issue two – connecting shared unmetered load. The proposed change allows for load to be connected without any trader agreement or request. This often means the trader has no agreement with the customer for this unmetered load portion of a customer's supply. Contact recommends that no new shared unmetered load be connected by a distributor without all traders impacted having agreed and accepted that their affected ICPs will be responsible for this shared unmetered load.</p>	
<p><b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b></p> <p>Contact recommends clause 10.33(1)(b) and 10.33A(1)(b) be reworded to include the requirement for all affected traders to agree to the creation of this shared unmetered load and the assignment of their share of this unmetered load to its ICPs.</p>	
<p><b>Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?</b></p> <p>Yes.</p>	
<p><b>Question 5: Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?</b></p> <p>Yes.</p>	
<p><b>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.</b></p> <p>Yes.</p>	

Reference	2018–23 Editorial corrections to the Code
	<p><b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b></p> <p>Yes.</p>
	<p><b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b></p> <p>Yes.</p>
	<p><b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b></p> <p>No.</p>
	<p><b>Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?</b></p> <p>Yes.</p>
	<p><b>Question 5: Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?</b></p> <p>No.</p>
	<p><b>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.</b></p> <p>Yes.</p>