



12 November 2018

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

Dear Authority

### **Access to WITS and the Registry**

Contact Energy welcomes the opportunity to respond to the Electricity Authority's Access to WITS and the registry consultation paper.

We have provided a general comment instead of answering each of the 11 questions. Our views are as follows:

#### ***Access to Wholesale Information Trading System***

- Contact largely supports the proposed amendments to the Code to enable the EA to establish access framework and standardised terms and conditions.
- Contact would like to note that if changes are to occur, that there would be no operational disruption to access for existing WITS users and that the proposed changes do not introduce additional costs to users (ie. having to establish additional security or connectivity mechanisms).

#### ***Access to Electricity Registry***

- Contact supports the rationale behind the EA proposing to extend the registry access policy to cover access to the registry itself, not just information contained within the registry.
- Contact has one minor concern in relation to the proposed Code amendment (11.28 - (2AA)(a) where the Authority may specify and publish amendments to the terms and conditions that both new and existing participants must comply with. The proposal doesn't state whether any changes to the terms and conditions would require consultation with affected participants. While the likely impact of any change to this particular policy could be considered low, it would be preferable that participants had some input or view of any proposed changes.

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

Yours sincerely

A handwritten signature in black ink that reads "D Abrahams".

Debby Abrahams  
**Commercial Manager**