

Appendix A Format for submissions: Access to WITS and the registry

Submitter	Maeve Jones, Flick Energy Limited
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Question	Comment
Q1. Do you agree that compromising the operation of WITS or the registry could have serious implications for the efficient operation of the New Zealand electricity market? If you disagree, please provide reasons.	Yes. The efficient operation of WITS and the registry is important both for industry participants and consumers who may wish to be making choices as a result of information stemming from both WITS and the Registry (for example Flick's pricing app or the Powerswitch website).
Q2. Do you agree there is a problem with the current arrangements for regulating access to WITS and the registry? If you disagree, please provide reasons.	We agree that it is important to maintain the security and operational ability of WITS and the registry. However, it is important that participants are able to rely on the terms and conditions for access and make decisions accordingly, so there should be a set process around changes to these terms and conditions.
Q3. Other than the problems identified in this paper, are there any other problems with the current arrangements for regulating access to WITS and the registry?	No that we are aware of.
Q4. Do you agree with our proposal to apply the proposed model for regulating registry access to the regulation of WITS access? If you disagree, please provide reasons.	Yes. However, it is imperative that the criteria for gaining access and for access being restricted is as transparent as possible to allow for innovation and enable new products and technologies. We appreciate that the EA has noted in the WITS access policy notes at clause 3.4 that it will start from the premise that it is preferable to provide (rather than prevent) access to the information in WITS. We consider that it's important that there is a level playing field for access to WITS and that the information should be available to access via an API. However, we

	<p>agree this must be balanced with restrictions on access for those who take actions that compromise the operational integrity of the system.</p> <p>The Authority should also consult on any changes to the access policy rather than make unilateral changes under clause 4.3(a) of the policy.</p>
Q5. Do you have any suggestions for alternative arrangements for regulating access to WITS? Please provide details.	No
Q6. Do you agree with our proposal to amend the regulation of access to the registry? If you disagree, please provide reasons.	Yes. We appreciate the Authority's actions to sure up the efficient operation and security of the registry.
Q7. Do you agree with the proposed improvements to the drafting of clause 11.28? If you disagree, please provide reasons.	Yes
Q8. Do you agree with the proposal's objective? If not, please provide reasons.	Yes
Q9. Do you agree the proposal's benefits outweigh its costs? If you disagree, please provide reasons.	Yes
Q10. Do you agree there are no viable alternatives to addressing the problem we have identified? If you disagree, please provide reasons.	We have not considered alternatives

<p>Q11. Do you agree that the proposed Code amendment complies with section 32(1) of the Act, and with the Code amendment principles, and should therefore proceed? If you disagree, please provide reasons.</p>	<p>Yes</p>
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