

005 - Like for like replacements and consultation

Submission Reference no: 5

 Electric Kiwi
New Zealand

Submitter Type: Retailer
Source: Web Form
Overall Position: Support

Question

Question 1: Do you agree with the Authority's problem definition?

Position

Yes

Notes

Question

Question 2: Do you agree with the Authority's proposed solution?

Position

Yes

Notes

Question

Question 2: Why not?

Notes

Question

Question 4: Do you agree with the objectives of the proposed amendment?

Position

Yes

Notes

Question

Question 5: Why not?

Notes

Appendix D Format for submissions

D.1 Please complete the table below for each proposed Code amendment requiring a regulatory statement. Only include those you wish to submit on.

Note: Please use table D2 to submit on technical and non-controversial proposals.

Operational Review of Metering and Related Registry Processes	
Submitter	Electric Kiwi - [REDACTED]
Proposal Reference	006 - Metering Issue Resolution Timing
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Yes	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
No. We do not agree with the combined timeframe in clause 10.43(4)(c) and new clause 10.46A(2)(b) as it could be 45 business days for an MEP to use its "best endeavours" to rectify a metering issue for a category one meter. This is an unnecessarily long period of time and has the potential to provide an extremely negative customer experience, especially if the meter was at one point a communicating AMI meter. We believe the time frame should be significantly shorter.	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
Yes. We recommend the EA publishes guidelines for "best endeavours".	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	

Yes

Question 5: Do you agree the proposed amendment is preferable to any other alternatives that meet the objectives of the proposed amendment? 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.

In reference to section 15 of the Electricity Industry Act 2010, we believe that the current proposed amendment is not the best option in the long-term benefit of consumers. Ideally, the time frames in clause 10.43(4)(c) and new clause 10.46A(2)(b) would be reduced by at least half. Please refer to question 2 for further detail.

011 - Raw meter data and compensation factors

Submission Reference no: 3

[REDACTED] Electric Kiwi
New Zealand

Submitter Type: Retailer
Source: Web Form
Overall Position: Support

Question

Question 1: Do you agree with the Authority's problem definition?

Position

Yes

Notes

Question

Question 2: Do you agree with the Authority's proposed solution?

Position

Yes

Notes

Question

Question 2: Why not?

Notes

Question

Question 4: Do you agree with the objectives of the proposed amendment?

Position

Yes

Notes

Question

Question 5: Do you agree the proposed amendment is preferable to any other alternatives that meet the objectives of the proposed amendment? 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.

Position

Yes

Notes

Question

Question 5: Why not?

Notes

Appendix D Format for submissions

D.1 Please complete the table below for each proposed Code amendment requiring a regulatory statement. Only include those you wish to submit on.

Note: Please use table D2 to submit on technical and non-controversial proposals.

Operational Review of Metering and Related Registry Processes	
Submitter	Electric Kiwi - [REDACTED]
Proposal Reference	025 - MEP updates of HHR/NHH and AMI flags
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Yes	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
No. We believe that the MEP should be responsible for trying to resolve the communications failure in a number of ways before being allowed to mark the AMI comms flag as No in the registry. We feel that the proposed solution favours the MEP, not the customer or trader reliant on the HHR data, and gives the MEP an easy way out of fixing the communication issue.	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
Yes. Schedule 10.6(10)(b) does not state a timeframe in which the MEP should or should not update the registry. We believe there should be a timeframe specified.	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	

Yes. However, we feel that the objectives haven't been fully met with the proposed solution.

Question 5: Do you agree the proposed amendment is preferable to any other alternatives that meet the objectives of the proposed amendment? 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.

In reference to section 15 of the Electricity Industry Act 2010, we believe that the current proposed amendment is not the best option in the long-term benefit of consumers. The MEP should be required to make a reasonable amount of attempts to restore communications before being allowed to update the comms flag in the registry.

028 - Meter bridging

Submission Reference no: 3

[Redacted] Electric Kiwi
New Zealand

Submitter Type: Retailer
Source: Web Form
Overall Position: Support

Question

Question 1: Do you agree with the Authority's problem definition?

Position

Yes

Notes

Question

Question 2: Do you agree with the Authority's proposed solution?

Position

Yes

Notes

Question

Question 2: Why not?

Notes

Question

Question 3: Please detail any comments on the Authority's proposed Code drafting.

Notes

One point that has not been considered is that occasionally bridging occurs but the trader and the MEP are unaware, and we may not be able to correct this within the 5 business days required.

Question

Question 4: Do you agree with the objectives of the proposed amendment?

Position

Yes

Notes

Question

Question 5: Do you agree the proposed amendment is preferable to any other alternatives that meet the objectives of the proposed amendment? 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.

Position

Yes

Notes

Question

Question 5: Why not?

Notes