

2 November 2018

Submissions

Electricity Authority  
PO Box 10041  
Wellington 6143

*by email: [submissions@ea.govt.nz](mailto:submissions@ea.govt.nz)*

**Submission on issues paper- Operational review of metering and related registry processes**

1. Orion New Zealand Limited (Orion) welcomes the opportunity to comment on the Electricity Authority's (the Authority) consultation paper (the paper) on Operational review of metering and related registry processes.
  - a. Our submission covers our response to Reference-027 of your specific questions.

**Concluding remarks**

2. Thank you for the opportunity to make this submission. We do not consider that any part of this submission is confidential. If you have any questions please contact Dayle Parris (Regulatory Manager), DDI 03 363 9874, email [dayle.parris@oriongroup.co.nz](mailto:dayle.parris@oriongroup.co.nz).

Yours sincerely



Dayle Parris  
**Regulatory Manager**

## Appendix A- Response to Questions

Operational Review of Metering and Related Registry Processes	
Submitter	Orion New Zealand
Proposal Reference	Reference 001- Electrical Connection and Disconnection of Points of Connection
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
No comment	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
No comment	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
The drafting for 10.30A shows 'owner' in bold. 'Owner' is a not part of a defined terms so should not appear bolded. The drafting for 10.33A(3) should show electrically connect as bold.	
<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 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.</b>	

*The objective of the Authority is to promote competition in, reliable supply by, and the efficient operation of, the electricity industry for the long-term benefit of consumers.*

No comment

Operational Review of Metering and Related Registry Processes	
Submitter	Orion New Zealand
Proposal Reference	Reference 003- Recovering certification costs
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
No comment	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
We have one high level question- is there a risk that the proposal will incentivise meter change out even if a meter is at the beginning of its certification life?	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
No comment	
<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 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.</b>	
<i>The objective of the Authority is to promote competition in, reliable supply by, and the efficient operation of, the electricity industry for the long-term benefit of consumers.</i>	

No comment

Operational Review of Metering and Related Registry Processes	
Submitter	Orion New Zealand
Proposal Reference	Reference 010- Selected Component Recertification
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
No comment	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
No comment	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
The drafting for 8(b) appears to miss some linking words and should read “(b) for category 3 <b>metering installations</b> , may use either 0.3% or the actual <b>uncertainty</b> of the <b>working standard</b> <i>as the uncertainty of the working standard</i> , provided the actual uncertainty of the <b>working standard</b> does not exceed 0.3%.”	
<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 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.</b>	
<i>The objective of the Authority is to promote competition in, reliable supply by, and the efficient operation of, the electricity industry for the long-term benefit of consumers.</i>	

No comment

Operational Review of Metering and Related Registry Processes	
Submitter	Orion New Zealand
Proposal Reference	Reference 027- Meter Resealing by Traders and Distributors
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
Yes we agree there are situations where it is more appropriate and efficient for the distributor to bridge or unbridge a load control device in the interests of customer service.	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
No we believe there is another situation that should be covered. Bridging is sometimes necessary in order to carry out testing. The same considerations/alterations applied to meter resealing should apply in the case of testing.	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
The new drafting requires that personnel who “remove or break the seal are qualified or trained to a level sufficient to ensure that they can safely remove or break the seal, bridge or unbridge the load control device, and replace the seal.” Additionally the proposal wording suggests that the audit template will be amended to require proof of training. We question why training and auditing of training should be a particular code and audit requirement. In order to carry out this work we envisage that a contractual or authorisation arrangement would need to be in place between the relevant parties. The matter of training or competence should be covered off under those arrangements rather than in the Code. At this stage we are unsure what training would be available as we are unaware of any particular unit standards in this area. Appropriate auditable training may need to be developed to meet this requirement if it remains in the Code.	
<b>Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?</b>	

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.**

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Yes

D.1 Please complete the table below if you wish to submit on the technical and noncontroversial Code proposals in Appendix B.

<b>Question 6: Do you have any comments on any of the technical/non-controversial changes? If so, please note which change and your comments.</b>
No

D.2 Please complete the table below if you wish to submit on the CBA for the proposals that require a regulatory statement.

<b>Question 7: Do you agree the costs and benefits identified are appropriately categorised? If you disagree, please provide reasons.</b>
Yes
<b>Question 8: Do you agree the benefits of the proposals in aggregate outweigh their costs? If you disagree, please provide reasons.</b>
Yes

D.3 Please complete the table below if you wish to submit on the issues that we propose to resolve without a Code amendment.

<b>Question 6: Do you require further clarification of any of the issues presented here? If so, please note which issues below and your questions.</b>
No

