

## 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	Powerco
Proposal Reference	005 - Like-for-like replacements and consultation
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
<p>Powerco agrees with the Electricity Authority's (the Authority) problem definition. Incidence of Metering Equipment Providers (MEPs) undertaking Like-for-like replacement of metering installations without consulting with the Distributor and the Trader suggest clause 10.34 isn't sufficiently clear.</p> <p>Powerco supports the requirement on MEPs to consult with Distributors and Traders if it proposes to install or modify a metering installation at a point of connection, including a like-for-like replacement. This consultation obligation ensures metering installations meet the requirements of all participants before the they are installed or modified.</p>	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
<p>Yes, we support the Authority's proposed amendments to clause 10.34.</p>	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	

**Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?**

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**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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D.2 Please complete the table below if you wish to submit on the technical and non-controversial Code proposals in Appendix 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.**

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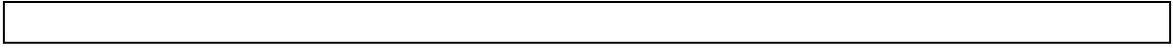
D.3 Please complete the table below if you wish to submit on the CBA for the proposals that require a regulatory statement.

**Question 7: Do you agree the costs and benefits identified are appropriately categorised? If you disagree, please provide reasons.**

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**Question 8: Do you agree the benefits of the proposals in aggregate outweigh their costs? If you disagree, please provide reasons.**

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## Appendix D Format for submissions

Operational Review of Metering and Related Registry Processes	
Submitter	Powerco
Proposal Reference	Initial energisation date necessity
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
<p>Powerco supports the Electricity Authority's (the Authority) intention to investigate the need for Distributors to populate the registry with the initial electrical connection date (IECD).</p> <p>Powerco and other Distributors encounter problems with obtaining accurate and timely IECD information. The issue is that the Authority is currently asking Distributors to provide a date that relates to an activity managed by the Retailer / Metering Equipment Provider (MEP). The hanging of meters, which is an activity that is managed by the Retailer / Metering company / metering installing agent, not the Distributor, is the trigger point for the electrical connection (livening). Distributors control the connection of the service main, ensuring that there is a retailer and an ICP before allowing that connection to the Network and recording information related to that activity.</p> <p>Additionally, as the IECD is first known by the Retailer / MEP, Distributors are not providing any unique information and therefore the requirement maybe an unnecessary administrative and regulatory burden that is not providing any benefit to consumers or to the market.</p> <p>The Authority's investigation should consider what problem is being solved by asking Distributors to provide the date for work managed by the Retailer/MEP. If there is no longer a problem, removal of the IECD requirement on Distributors would promote a more accurate and efficient registry process.</p> <p>Powerco looks forward to discussing this issue further with the Authority in future consultations.</p>	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	

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**Question 3: Do you have any comments on the Authority's proposed Code drafting?**

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**Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?**

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**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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D.1 Please complete the table below if you wish to submit on the technical and non-controversial Code proposals in Appendix 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.**

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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>
<b>Question 8: Do you agree the benefits of the proposals in aggregate outweigh their costs? If you disagree, please provide reasons.</b>