



13 November 2018

Submissions
Electricity Authority
Level 7, Harbour Tower
2 Hunter Street
Wellington

Market Enhancement Omnibus

To whom it may concern,

Trustpower welcomes the opportunity to submit on the Authority's Market Enhancement Omnibus.

In general, we think there is a case for some caution in changing the current rules, systems, and processes until there is more clarity about the world we are moving to.

A balance must be struck between a desire to change the rule book so no innovation is lost as a result of the rules, and an assessment of where consumer interests might lie.

The Authority must not make the mistake of "leading" the market; rather it should respond to market failures as they arise.

The risk is that the resulting regulatory uncertainty stifles innovation from those who already have expertise and experience with the current rules and have developed or are in the process of developing innovative products to supply customer preferences under the existing regulatory framework.

New Zealand has some of the best switching processes in the world, and Trustpower supports future-proofing these. But even the best-drafted rules cannot foresee all eventualities.

In general, Trustpower supports the Authority in its creation of rules that make industry processes more efficient. But in doing so, the Authority needs to listen to MEPs and ATHs by not creating rules that industry participants cannot comply with.

Switch Process Review

In regard to the Switch Process Review, we wish to highlight the need for an amendment to Part 11 of the Code.

A well-known industry de facto practice has arisen, whereby gaining traders switching large batches of commercial ICPs have been using the move-in (MI) switch type, instead of the transfer (TR) switch type mandated by Schedule 11.3, Clause 2(2)(b) of the Code.

This is because the transfer switch type does not allow gaining traders and losing traders to fix a date for the switch. The move-in switch type does allow this, giving certainty to consumers, traders and distributors that contractual obligations will be met and that billing outcomes are accurately reflected.

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Trustpower submits that the Code be amended to allow traders to fix a switch date whilst using the mandated transfer switch type.

We consider that amending the Code to enable a fix date for transfers would correct a well-known issue with the current switch process and thereby promote the efficient operation of the current switch arrangements.

Trustpower would welcome dialogue with the Authority in order to develop a robust, industry-wide solution to this issue.

Best regards,

A handwritten signature in blue ink, appearing to be "S. Darmody".

Simon Darmody

Wholesale Supply & Reconciliation Manager

Ph: 021-751792

001 - Electrical Connection and Disconnection of Points of Connection

Submission Reference no: 4

Trustpower Limited

Private Bag 12023, Tauranga Mail Centre, Tauranga 3143

Bay of Plenty

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

002 - Prohibition of net metering

Submission Reference no: 4

Trustpower Limited
Private Bag 12023, Tauranga Mail Centre, Tauranga 3143
Bay of Plenty
New Zealand

Submitter Type: MEP
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

The proposed code amendment is congruent with Trustpower's existing understanding and application of metering for small-scale generation. However, there are existing timing constraints when installing import/export metering. For example, in most cases a newly installed PV solar system is connected and energised before the appropriate metering is installed. This would lead to an automatic code breach if this practice continued after the amendment. Currently, some networks change the installation type on the registry from 'L' to 'B' after the PV solar is installed, while others change this status when they give their approval for the installation to go ahead. The 'type' change prior to PV installation is preferable because it would give retailers notification to appoint an MEP to install appropriate metering before the system is connected. Alternatively, providing an interim installation code for the networks could be a solution.

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

Yes, but in order to prevent an automatic rule breach by the retailer and the MEP, the networks should only approve small-scale generation to go ahead after the appropriate metering is installed.

Question

Question 5: Why not?

Notes

004 - Distributor NSP information notifications to reconciliation manager

Submission Reference no: 1

Trustpower Limited
Private Bag 12023, Tauranga Mail Centre, Tauranga 3143
Bay of Plenty
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

006 - Metering Issue Resolution Timing

Submission Reference no: 2

Trustpower Limited
Private Bag 12023, Tauranga Mail Centre, Tauranga 3143
Bay of Plenty
New Zealand

Submitter Type: MEP
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

007 - Minimum Voltage Requirements for Category 3 and 4 Metering Installations

Submission Reference no: 2

Trustpower Limited

Private Bag 12023

Tauranga Mail Centre, Tauranga 3143

Bay of Plenty

New Zealand

Submitter Type: MEP

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

008 - Prevailing Load Checks

Submission Reference no: 4

Trustpower Limited

Private Bag 12023

Tauranga Mail Centre, Tauranga 3143

Bay of Plenty

New Zealand

Submitter Type: MEP

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

009 - ISO 9001 sync with class B ATH application period

Submission Reference no: 2

 Trustpower Limited

Private Bag 12023

Tauranga Mail Centre, Tauranga 3143

Bay of Plenty

New Zealand


Submitter Type: MEP

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

010 - Selected component recertification

Submission Reference no: 3

Trustpower Limited

Private Bag 12023
Tauranga Mail Centre, Tauranga 3143
Bay of Plenty
New Zealand

Submitter Type: MEP

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

011 - Raw meter data and compensation factors

Submission Reference no: 2

Trustpower Limited

Private Bag 12023
Tauranga Mail Centre, Tauranga 3143
Bay of Plenty
New Zealand

Submitter Type: MEP
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

Although we would question who is not applying compensations correctly at present. If not, should this issue be addressed with the offending participant?

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

012 - Monitoring of event logs

Submission Reference no: 2

Trustpower Limited

Private Bag 12023

Tauranga Mail Centre, Tauranga 3143

Bay of Plenty

New Zealand

Submitter Type: MEP

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

013 - Raw meter data output test

Submission Reference no: 3

Trustpower Limited
Private Bag 12023
Tauranga Mail Centre, Tauranga 3143
Bay of Plenty
New Zealand

Submitter Type: MEP
Source: Web Form
Overall Position: Do not support

Question

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

Position

No

Notes

Question

Question 1: Why not?

Notes

This should not need to be so prescriptive.

Question

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

Position

No

Notes

Question

Question 2: Why not?

Notes

Responsible participants would use an appropriate load, and would endeavour to use as much load as practicable to complete these tests in an appropriate timeframe. Also programming a meter to display decimal points purely for this purpose only causes confusion for meter readers and customers alike.

Question

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

Notes

The focus should be on the intent to establish that the meter is working correctly.

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

No

Notes

Question

Question 5: Why not?

Notes

Most meters will also display instantaneous current and power values. If the certifier can confirm the meter is measuring the same values to satisfy Schedule 10.7, Clause 9(1)(c)(ib)(B), and if the MEP then ensures the meter register advances over time via back office, this should eliminate the need to witness the register advancing on site at the time of certification. Eliminating the need to witness the register advancing on site at the time of certification would save the certifier time and money that would ultimately be passed on to the customer, thereby enhancing the efficient operation of the electricity industry for the long-term benefit of consumers.

015 - Comparative recertification

Submission Reference no: 3

Trustpower Limited

Private Bag 12023

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Bay of Plenty

New Zealand

Submitter Type: MEP

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

It should be clearer that the CTs can be re-certified regardless of their current CT certification and only if the meter is certified. The re-certification will more often than not align the certification of the meter and CTs, so Schedule 10.7, Clause 12(2)(a) should read; "...the certification of the current transformers in the metering installation expires on or before the meter certification expiry date; and..." i.e. "on or" should be inserted between "expires" and "before" in Clause 12(2)(a).

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

016 - Error calculations at certification

Submission Reference no: 2

Trustpower Limited
Private Bag 12023
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Bay of Plenty
New Zealand

Submitter Type: MEP
Source: Web Form
Overall Position: Do not support

Question

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

Position

No

Notes

Question

Question 1: Why not?

Notes

Agree with Problem 1 but not Problem 2.

Question

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

Position

No

Notes

Question

Question 2: Why not?

Notes

No. Estimating total quantity is irrelevant. Metering must be fit for site capacity.

Question

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

Notes

Rather than simplify the obligations in this clause, as requested by the class B ATHs, the Authority elects to take no action, simply referring to advice from the Chief Metrologist. Then the Authority exacerbates the problem by inserting requirements into the original clause for prophetic yearly 'profiles', 'load demands' and 'power factors' that need to be considered for percentage errors. An ATH has to select the appropriate type of tested and calibrated metering for each installation and ensure that this metering operates correctly after installation. Predicting power factors and forecasting load over a twelve month period is surely outside the scope of an ATH.

Question

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

Position

No

Notes

Question

Question 4: Why not?

Notes

ATHs are strictly bound to certify metering that meets internationally-agreed specifications and use calibrated working standards with known measurement uncertainties. The selected meter's specifications and class should cover the expected

and unexpected load and power factor 'profiles', which the Authority wants the ATHs to predict. The metering type and class for any installation is based on the supply capacity and/or fuse rating. A realistic approach is for the metering to match the maximum predicted load and, for Category 2 sites, CT ratios appropriately selected. A guideline could be: < 100 Amp WC meter 100 - 300 Amps 300/5 CTs 250 - 500 Amps 500/5 CTs With regards to Schedule 10.7, Clause 22(1)(a), "...the estimated total quantity of electricity to be conveyed through the metering installation over the next 12 months": This wording has no relevance to the selection and therefore accuracy of metering.

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

No

Notes

Question

Question 5: Why not?

Notes

ATHs exist because the Authority has acknowledged that they are qualified and possess the necessary expertise and skill set to carry out metering. When these professional bodies (ATHs) request simplification of what they cumulatively believe is onerous and impossible to carry out, the Authority should take note. If the Authority cannot provide a solution to a regulatory requirement that is impossible to implement in the real world, it should allow the ATHs to come up with an agreed practical solution. Making on-site testing more and more onerous interferes with the efficient operation of the industry to the long-term detriment of consumers.

017 - Application of error compensation

Submission Reference no: 3

Trustpower Limited

Private Bag 12023
Tauranga Mail Centre, Tauranga 3143
Bay of Plenty
New Zealand

Submitter Type: MEP

Source: Web Form

Overall Position: Support

Question

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

Position

Yes

Notes

Question

Question 1: Why not?

Notes

We do agree with the Authority's problem definition.

Question

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

Position

Yes

Notes

Question

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

Position

Yes

Notes

Question

Question 4: Why not?

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

018 - Certification validity periods

Submission Reference no: 3

Trustpower Limited

Private Bag 12023
Tauranga Mail Centre
Tauranga 3143
Bay of Plenty
New Zealand

Submitter Type: MEP
Source: Web Form
Overall Position: Do not support

Question

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

Position

No

Notes

Question

Question 1: Why not?

Notes

Not specified.

Question

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

Position

No

Notes

Question

Question 2: Why not?

Notes

We agree with the intent of the solution, but not the wording. Schedule 10.8, Clause 1(d) should refer to a certification report, not a calibration report. This should be compulsory to produce on request.

Question

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

Notes

Schedule 10.8, Clause 1(d) should be changed to "Must be able to produce a meter certification report on request that includes:" . i.e. replace "calibration" with "certification" and insert "on request" between "report" and "that". The calibration is carried out before certification, therefore a calibration report cannot include certification details. Calibration reports are often inclusive of entire batches of meters, and not easily incorporated into a certification report. However the calibration documents could be referred to in the certification report and supplied on request. This report requires data to be collated from different data sources, and it is not practical to merge these documents for each meter where this report is only ever requested and viewed by auditors.

Question

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

Position

No

Notes

Question

Question 4: Why not?

Notes

The practicality of producing a complete report for each meter is not cost-effective.

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

No

Notes**Question**

Question 5: Why not?

Notes

We believe there has been a mistake in wording of the report. We believe it should say that a certification report "must be produced on request" as it is a manual process to merge the data from multiple source documents. This report requires data to be collated from different data sources, and it is not practical to merge these documents for each meter where this report is only ever requested and viewed by auditors. Any cost incurred by an MEP will be passed on to consumers. This would interfere with the efficient operation of the electricity industry for the long-term benefit of consumers.

020 - Alternative certification for POC to the grid

Submission Reference no: 1

Trustpower Limited
Private Bag 12023, Tauranga Mail Centre, Tauranga 3143
Bay of Plenty
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

021 - Obsolete sticker removal

Submission Reference no: 2

Trustpower Limited

Private Bag 12023
Tauranga Mail Centre
Tauranga 3143
Bay of Plenty
New Zealand

Submitter Type: MEP
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

022 - Inspection periods

Submission Reference no: 2

Trustpower Limited

Private Bag 12023
Tauranga Mail Centre
Tauranga 3143
Bay of Plenty
New Zealand

Submitter Type: MEP
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

023 - Combining certification stickers

Submission Reference no: 2

Trustpower Limited

Private Bag 12023
Tauranga Mail Centre
Tauranga 3143
Bay of Plenty
New Zealand

Submitter Type: MEP
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

024 - NSP decommissioning timeframes

Submission Reference no: 1

Trustpower Limited
Private Bag 12023, Tauranga Mail Centre, Tauranga 3143
Bay of Plenty
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

025 - MEP updates of HHR/NHH and AMI flags

Submission Reference no: 3

 Trustpower Limited

Private Bag 12023
Tauranga Mail Centre
Tauranga 3143
Bay of Plenty
New Zealand


Submitter Type: MEP
Source: Web Form
Overall Position: Do not support

Question

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

Position

No

Notes

Question

Question 1: Why not?

Notes

The registry flags are misleading and not fit for purpose. An ATH can only certify the installation as per its capability at the time of certification. The HHR - NHH flags should indicate the capability of the metering i.e. that it is programmed to store interval data regardless of whether the interval data is being collected or used. The AMI should indicate back office data collection. If the HHR and AMI flag is Y, the interval data is available to the retailer. If a meter is non-communicating, it can still be recording interval data and therefore HHR and the AMI flag would be N. The AMI flag should be an indicator only for a gaining retailer to determine MEP services. Therefore, the timeframe should be set once an MEP establishes that communications with the meter are not reliable enough to offer AMI service. In addition, the Code does not have a mandated time frame for: a) updating the AMI flag in the registry when an AMI meter ceases to communicate with an MEP's back-office systems b) resolving communication issues between a metering installation and an MEP's back-office systems.

Question

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

Position

No

Notes

Question

Question 2: Why not?

Notes

The HHR flag should be set if the meter is programmed to store interval data regardless of whether the interval data is being collected or used. Schedule 10.6, Clause 8(11) should be changed to: (11) If a metering equipment provider decides to take the actions specified in subclause (10)(a), the metering equipment provider must complete those actions by the earlier of— (a) the number of full days that equate to no more than 25% of the maximum interrogation cycle for the metering installation from the date of the last successful interrogation; OR (b) 30 days from the date of the last successful interrogation. i.e. replace "and" between "interrogation;" and "(b)" with "or".

Question

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

Notes

Regarding Schedule 11.4, Clause 3 (Metering equipment provider to advise registry manager of changes to registry metering records): In most retailer and MEP commercial contracts, the absence of communications with the meter after ten working days triggers an investigation. We believe that if communication is not restored within the interrogation cycle, 30 days to update the

AMI flag would be practical and still provide an indication to potential new retailers that the meter is reliably collecting AMI readings.

Question

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

Position

No

Notes

Question

Question 4: Why not?

Notes

The objective should be to update the registry to indicate to a potential gaining retailer the services available at the ICP. The registry should not be a tool to manage sites with intermittent communication issues. The retailers have commercial agreements for service levels, and the updating of registry flags should not be less than the industry norm, otherwise updating of the registry will become expensive and hard to manage. Once MEPs have carried out their investigation and determined a site is no longer communicating, then the registry should be updated. Three business days is unrealistic, and will incur unnecessary costs for retailers.

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

No

Notes

Question

Question 5: Why not?

Notes


Our preferred option would reduce the overheads that MEPs would be required to administer, savings that could then be passed on to consumers. This would promote the efficient operation of the electricity industry for the long-term benefit of consumers.

026 - Excluding non-market-related meter registers

Submission Reference no: 1

 Trustpower Limited

Private Bag 12023
Tauranga Mail Centre
Tauranga 3143
Bay of Plenty
New Zealand


Submitter Type: MEP
Source: Web Form
Overall Position: Do not support

Question

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

Position

No

Notes

Question

Question 1: Why not?

Notes

The registry should show a reflection of the meter configuration and the services available from each ICP. The bill flag allows MEPs to indicate which registers are used for billing or not. Networks could create problems for customers and retailers by introducing meter configuration that is not shown on the registry.

Question

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

Position

No

Notes

Question

Question 2: Why not?

Notes

If a network refuses to use the interval data as intended, and programs TOU tariffs into the meter, then they should be obligated to reflect these in the metering records captured in the registry.

Question

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

Notes

The Authority should refrain from changing the rules to accommodate recalcitrant participants.

Question

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

Position

No

Notes

Question

Question 4: Why not?

Notes

Interval data should be used, or TOU registers should be reflected on the registry.

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

No

Notes

Question

Question 5: Why not?

Notes

All registers displayed at the meter should be reflected on the registry. If the registry does not reflect what is on site, this causes confusion for meter readers and retailers, which could add cost and affect efficient operation of the electricity industry for the long-term benefit of consumers.

027 - Meter resealing by traders

Submission Reference no: 2

Trustpower Limited

Private Bag 12023
Tauranga Mail Centre
Tauranga 3143
Bay of Plenty
New Zealand

Submitter Type: MEP
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

028 - Meter bridging

Submission Reference no: 2

Trustpower Limited

Private Bag 12023
Tauranga Mail Centre
Tauranga 3143
Bay of Plenty
New Zealand

Submitter Type: MEP
Source: Web Form
Overall Position: Do not 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

No

Notes

Question

Question 2: Why not?

Notes

Under the proposal, an authorised MEP or distributor that has bridged a meter, would have to immediately advise the trader responsible for the ICP that the meter has been bridged. It would be helpful for a timeframe to be imposed for this notification rather than simply "immediately", and also some rigour around how the advice of bridging should be provided given the challenges that come in communication channels between contractors, MEPs and retailers.

Question

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

Notes

We propose that, from the time they become aware that a meter is bridged, the trader responsible for the ICP must arrange for an MEP: a) to correct the bridged meter within five business days, and b) to monitor the reinstatement of the metering, and ensure all electricity flowing through the ICP flows through a certified metering installation. In relation to Schedule 15.2, Clause 2A, we believe only compliant check meters should be used. There would be lots of old and inaccurate customer-owned check meters in place that should not be used for this purpose.

Question

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

Position

No

Notes

Question

Question 4: Why not?

Notes

The amendments seem to assume that bridging is only happening as a result of this being the default process for after-hours reconnections.

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