

13 November 2018

Submissions
Electricity Authority
PO Box 10041
WELLINGTON 6143

Email: submissions@ea.govt.nz

REVIEW OF METERING AND RELATED REGISTRY PROCESSES

Unison welcomes the opportunity to provide a submission to the Electricity Authority (the Authority) on the *Review of Metering and Related Registry Processes*.

Unison has provided a submission on the following two proposals:

- 026: Excluding non-market-related meter registers
- 027: Meter resealing by Traders and Distributors

Our responses to each of these proposals is attached. For any questions on this submission, please contact Roanna Vining, Senior Regulatory Affairs Advisor by phone (06) 873 9329 or email Roanna.Vining@unison.co.nz.

Yours sincerely,



Nathan Strong
GENERAL MANAGER, BUSINESS ASSURANCE

Appendix: Unison Submissions on Proposals

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|---|---|
| Operational Review of Metering and Related Registry Processes | |
| Submitter | Unison Networks Limited |
| Proposal Reference | 026: Excluding non-market-related meter registers |
| Question 1: Do you agree with the Authority's problem definition? If not, why not? | |
| Yes, Unison agrees with the Authority's problem definition for this proposal. | |
| Question 2: Do you agree with the Authority's proposed solution? If not, why not? | |
| No, Unison does not agree with the Authority's proposed solution. The Authority should not be encouraging distributors to use time blocks that do not align to the Register Content Codes for time of use pricing. Under the Authority's proposal, there will be distributor-only registers outside the Registry that will still be used to bill customers. This reduces transparency for consumers, and potentially makes it even more difficult in future to shift back to billing line charges through retailers. Overall the outcomes of this proposal would likely have the consequences of reduced data integrity, reduced transparency and reduced choice. If the Registry Content Codes are not fit for purpose, then these should be amended rather than excluding 'non-market-related' meter registers. | |
| Question 3: Do you have any comments on the Authority's proposed Code drafting? | |
| No | |
| Question 4: Do you agree with the objectives of the proposed amendment? If not, why not? | |
| Unison understands the driver to remove unnecessary costs for MEPs and traders; however, we consider that removal of these meter registers from the Registry is not the most appropriate response. We are unsure why the requirement for registers recording active energy to be recorded in the registry is outdated. | |
| 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. | |
| As noted in response to question 2, Unison suggests the Authority consider amending the Register Content Codes rather than excluding non-market-related meter registers. This would encourage distributors to be consistent with ToU blocks and assist retailers to make system changes that will have longevity. Unison acknowledges that ToU distributor pricing methods have implications on retailer billing systems, and that this is currently a limitation of implementing distributor pricing changes. | |

Operational Review of Metering and Related Registry Processes

Submitter Unison Networks Limited

Proposal Reference 027: Meter resealing by traders

Question 1: Do you agree with the Authority's problem definition? If not, why not?

Yes, Unison agrees with the Authority's problem definition.

Question 2: Do you agree with the Authority's proposed solution? If not, why not?

Generally, yes, we agree with the solution.

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

Unison notes practical limitations with the proposed amendments to **Clause 48(1)**:

*i) permits a distributor to break or remove a seal for bridging/unbridging a load control device (**excluding any device that controls a time blocked channel, eg, day/night, as this would affect the accuracy of the meter readings and market settlement**) only where the distributor provides the load control signal.*

The devices referred to above (load control device and device controlling time blocked channels) would often be one and the same device, i.e. a ripple relay that utilises two channels. One for network load control purposes and the other to operate the day night registers on the meter. There will be numerous instances every year where the fault man needs to break these seals to access the load control function, but obviously not affecting the day/night register controls. This Code proposal does not allow for this. Unison recommends the exclusion be amended to allow for distributors to access these meters, but prohibiting any changes to day/night channels.

Clause 48

*(1A) Despite clause 10.12, a **distributor** may interfere with the metering installation without authorisation of the **metering equipment provider** responsible for the **metering installation**, to reset a load control device or bridge or unbridge a load control device, if—
(a) the load control device does not control a **time block meter channel**; and
(b) the **distributor** provides the load control signal to the load control device.*

Unison has similar concerns with the drafting of this clause – what is defined as a 'load control device'? Is it the ripple relay complete, or is it the channel within the ripple that performs the individual function? Each ripple could include two or more channels for two or more different purposes: i.e. load control and day/night functions.

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

Yes, Unison agrees with the objectives of the proposed amendment.

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.

Yes