

Appendix A Format for submissions

A.1 Please complete the table below for each proposed amendment on which you wish to submit. Please include the reference number from the first row of the table in Appendix B).

Reference	2019 – 01
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
<p>Problem 1: We partially agree with the Authority's problem definition. The Authority has not taken into account instances when the parties are not able to agree for example when the price category change is not in the best interests of the customer.</p> <p>Problem 2: Agree</p>	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
<p>Problem 1: The proposed solution does not take into account instances when the parties do not agree to the price category change, nor does it provide an explanation on how to resolve this when it happens.</p> <p>Contact's concern is that not all corrections / updates to distributor price category codes are in the customers' favour and where there is a proposed backdated correction that is adverse to the customer, Contact believes distributors should not be able to back date such a correction.</p> <p>Problem 2: Agree</p>	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
No comment	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	
See above	
Question 5: Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?	
No comment	
Question 6: Do you agree the proposed amendment is preferable to the other options? 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.	
See above.	

Reference	2019 - 05
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Contact partially agrees with the problem definition but propose that it should also include the obligation to provide complete and accurate information as the underlying reason for requiring retailers to use specific profile shapes applicable to particular consumption patterns.	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
<p>Contact believes that the proposed solutions fall short and simply address a few technical issues.</p> <p>In particular, the Authority does not address the fact that traders wishing to submit volumes against accurate generic profile shapes must get approval from the Authority to use their own “trader specific” profile shapes. However, in reality, unless each trader is prepared to pursue a profile application (or gain approval from another trader to use their custom profile) to the Authority, traders will generally submit generic loads with specific shape or engineering profiles using the default Residual Profile Shape (RPS) which further corrupts the use of the residual seasonal shape for other participants.</p> <p>Contact believes there is an opportunity for the Authority to instruct the Reconciliation Manager to produce profiles for generic loads (in a similar manner to how the Authority instructed for both PV1 and EG1 profiles for distributed generation). This will assist the industry to calculate more accurate consumption information. For example:</p> <ol style="list-style-type: none"> 1. An unmetered telecommunication cabinet has a generic 24/7 static load profile that can also be applied to other types of unmetered load such as parking pay/display machines, subway and tunnel lighting, electric fences, CCTV installations, electronic bus / train timetable signs, traffic lights and electronic advertising signs. 2. A shared unmetered and standard load. The trader with the council Distributed Unmetered Load may have an approved profile for submission of streetlight load into appropriate trading periods. However, most other traders on the network with shared unmetered and standard unmetered load just assign this load to RPS profile as the effort to maintain and approve a profile is not worth it at an individual trader level. We encourage the Authority to take up the opportunity to develop generic profile shapes where the majority of traders could potentially utilise these profile shapes to calculate more accurate consumption information. 	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
We propose the Authority amend the Code to require the Reconciliation Manager to calculate and publish a suite of seasonal shapes for both generic unmetered load and night controlled loads to improve the accuracy of the RPS and also Unaccounted for Energy (UFE) intra-day allocation to participants.	

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

Contact believes that the objective should be extended to ensure the most appropriate profile shape is used by participants and the Reconciliation Manager when calculating consumption information.

Question 5: Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?

We believe that the real benefit is for traders to use appropriate profile codes for the submission of consumption volumes that correctly reflect the pattern of consumption to reduce the current corruption of the RPS. This will result in more accurate intra-day UFE being applied to the appropriate trading periods.

Currently traders who use custom profiles for submission incur elevated intra-day off peak UFE volumes due to other traders using RPS for calculating historic estimates and then reporting this volume as RPS for the Reconciliation to then apportion this volume into trading periods using the RPS shape (GR020).

In addition, this will reduce the profile compliance costs for those traders who currently have custom profiles for this type of load.

Question 6: Do you agree the proposed amendment is preferable to the other options? 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.

We do not believe that the proposed amendment is preferable. The Authority should consider instructing the Reconciliation Manager to produce seasonal profiles for generic loads such as unmetered load and night controlled loads as proposed above.

Reference	2019 - 09
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?	
Yes	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
Yes	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	
Yes	
Question 5: Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?	
Yes	
Question 6: Do you agree the proposed amendment is preferable to the other options? 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	

Reference	2019 - 10
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Contact does not believe that the problem definition is correct in that it incorrectly refers to ICPs needing to be decommissioned as part of the creation of an embedded network. This statement is not a correct reflection of the Code. Furthermore, there is no requirement to assess the benefit of the embedded network to the customer, which should be the primary objective and benefit of this proposed code change.	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
Contact believes that it should not only be the retailers (by their consent/refusal to approve an embedded network) that inform the Authority's decision on whether to approve the embedded network, but that the embedded network owners should also be required to confirm that they will provide clear and measurable customer benefits identified prior to the Authority granting approval.	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
None	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	
See above	
Question 5: Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?	
Contact does not believe that the benefits of the proposed amendment outweighs its costs, as the proposed amendment has not considered the benefit to the customer which should be the primary objective and benefit of this proposed Code change.	
Question 6: Do you agree the proposed amendment is preferable to the other options? 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.	
See above. In addition, Contact proposes that the Authority should conduct active monitoring of embedded network line charges to ensure that customers are no worse off than they would be if they were connected to the local network by way of a network extension.	