



15 October 2019

Electricity Authority  
Via email: [submissions@ea.govt.nz](mailto:submissions@ea.govt.nz)

**Consultation Paper – Code Review Programme 2019 – Number 4**

Intellihub would like to thank the Electricity Authority for the opportunity to comment on the Code Review Programme 2019 – Number 4.

Please find included with this letter our Submission response. Our comments relate to Problem 2 only. We have not commented on the other Problems, on the basis that we are comfortable with the change or these are more relevant to other participants than to MEPS.

Where we have not made an express comment, we believe the proposed amendments are appropriate in that they focus on resolving current problems with the Electricity Participation Code 2010, in a practicable way.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Stacey Tibbetts".

Stacey Tibbetts  
**General Manager – Sales and Business Development**

## 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 - 04
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
We agree that there is the potential for a trader event of default to impact the market processes as described in Problem 2.	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
As a MEP we are comfortable that we are able to meet the Authority's requirements for Problem 2 and that it will resolve the problem definition.	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
No	
<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 benefits of the proposed amendment outweigh its costs?  
If not, why not?**

We are comfortable with the benefits of the proposed amendment for Problem 2 on the basis that the outlined timeframe of when the Authority would intervene is appropriate on the 17<sup>th</sup> day post notification. The timely resolution of this event is in the best interest of all participants and the impacted customers.

**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