



5 November 2019

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

Genesis welcomes the opportunity to provide feedback on the fourth Code Review Programme Consultation Paper dated 24 September 2019.

The proposed changes to the Electricity Industry Participation Code (**Code**) set out in the paper represent, for the most part, solutions to the problems identified by the Electricity Authority (**Authority**) or are otherwise improvements to the understanding and accessibility of the Code. While the costs and benefits of some of the proposed changes are difficult to quantify, based on the qualitative benefits set out in relation to these, we consider that on balance, those changes have merit.

Overall, we support the proposed changes described in the paper and set out in the Schedule to this letter our response to the questions posed by the Authority concerning each change. In two instances – proposed changes to registry information and the event of default provisions – we propose additional changes for the Authority to consider.

If you wish to discuss any of these matters further, please contact me on 09 951 9299 or [warwick.williams@genesisenergy.co.nz](mailto:warwick.williams@genesisenergy.co.nz).

Yours sincerely

A handwritten signature in blue ink that reads "Williams".

Warwick Williams  
**Senior Regulatory Counsel  
and Group Insurance Manager**



## Schedule

Appendix B - Proposed amendments						
Ref. no.	Q1: Do you agree with the Authority's problem definition? If not, why not?	Q2: Do you agree with the Authority's proposed solution? If not, why not?	Q3: Do you have any comments on the Authority's proposed Code drafting?	Q4: Do you agree with the objectives of the proposed amendment? If not, why not?	Q5: Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?	Q6: 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.
2019-01	Yes, but it is limited to a single scenario. This issue arises with all dynamic data fields in the Registry. There are other examples where participants find themselves caught between two conflicting Code obligations – the timely advice of a change and providing an accurate effective date. This tension comes to the fore where historical data errors are discovered, or as in the presented scenario, some agreement needs to be made in relation to the effective date.	Yes	No	Yes	Yes	The proposed amendment only addresses one scenario where amendments need to be made. The amendment should also extend to allow corrections for historical data errors (but without prejudice to the relevant party's initial obligation to provide accurate information).
2019-02	Yes	Yes	No	Yes	Yes	Yes
2019-03	Yes	Yes	No	Yes	Yes	Yes
2019-04	Yes	Yes	It should be noted that the change to	Yes	The costs for MEPs to supply	Yes. However, the changes to clauses 4B and 7 of Schedule 11.5

			clause 3 (to address Problem 2) will not be a complete solution. MEP's do not hold read data for non-AMI (legacy and non-communicating) metering		read data, and Traders to onboard customers, outside of business as usual" procedures may be understated. While we consider they are unlikely to outweigh the benefits, we do not believe they are 'negligible'.	(to address Problems 4 and 6) should include an obligation on the Trader retaining an ICP because of the enforced switching activity to inform the relevant customer as soon, as is reasonably practicable after it has become aware, that the switch from the defaulting trader has been cancelled at the Authority's direction under the trader default provisions of the Code. This would ensure customers are kept informed, including the reasons why.
2019-05	Yes	Yes	No	Yes	Yes	Yes
2019-06	Yes	Yes	No	Yes	Yes	Yes
2019-07	Yes	Yes	No	Yes	Yes	Yes
2019-08	Yes	Yes	No	Yes	Yes.	Yes
2019-09	Yes	Yes	No	Yes	Yes	Yes
2019-10	Yes	Yes	No	Yes	Yes	Yes
2019-11	Yes	Yes	No	Yes	No. We do not believe the full benefits as stated will be realised as the time and effort expected to be saved on understanding Code obligations will still be spent. Also, with the obligation timers now starting on delivery, not receipt, there may	

					cost incurred by traders in altering their systems to adjust for files received the day after delivery. This would occur for files 'delivered' after the last polling by a trader of the SFTP service for that business day.	
2019-12	Yes	Yes	No	Yes	Yes	Yes
2019-13	Yes	Yes	No	Yes	Yes	Yes

### Appendix C - Technical and non-controversial proposed amendments

Ref. no.	Clause	Comment
3	1.1(1)	"...expected from a skilled and experience asset owner..." should be "...expected from a skilled and experienced asset owner..."