

networktasman

Your consumer-owned electricity distributor

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5 November 2019

Submissions
Electricity Authority
P O Box 10041
Wellington 6143

By email

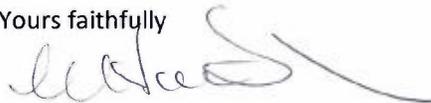
Dear Electricity Authority

Code Review Programme number 4 – September 2019

Network Tasman thank you for the opportunity to provide feedback of the Electricity Authority Code Review Programme Number 4 – September 2019

Network Tasman supports the majority of proposed amendments. We have chosen to comment on a small number of proposals. Please find attached our submission. Should you wish to discuss any matter raised in this submission, please do not hesitate to contact Daniel Vincent on 03 9893607.

Yours faithfully



Daniel Vincent
Regulatory and Commercial Manager
p.p. Wendy Hartshorne

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>NTL agree with problem 1. A distributor is subject to a breach of the current code when backdating a price category change. NTL don't believe a distributor should be accountable for a backdated breach. We currently view it is the traders responsibility to establish their customers correct pricing plan and submit change requests to the Distributor in a timely manner.</p> <p>NTL don't agree with problem 2. The trader has access to the registry and should be able to reconcile the pricing between their in-house systems and the registry.</p>	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
<p>NTL agree with the Authority's proposed solution for problem 1. But pose the question; "what happens if the distributor and the trader do not agree?"</p> <p>NTL agree the Authority's proposed solution will resolve problem 2.</p>	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
<p>NTL agree in principle with the addition of clause (aa) but find the wording difficult to comprehend, and there is still the issue around the Distributor and the Trader having to agree. Who has final decision?</p>	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	

NTL agree with the objectives of the proposed amendment in a timing sense

**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.**

No comment

A.2

Reference	2019 - 06
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
NTL do not agree with the issue that has been put to the Authority. NTL support the Authority in disagreeing with the interpretation.	
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?	
No.	
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?	
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.**

Yes