
From: [REDACTED]
Sent: Wednesday, 11 December 2019 9:45 AM
To: Submissions Mailbox <Submissions.Mailbox@ea.govt.nz>
Cc: Ron Beatty [REDACTED]
Subject: FW: Consultation Paper - Switch Process Review - Superseded submission comments

Good morning

We thank you for the opportunity to make a submission on what we consider a very overdue and needed consultation paper. This email supersedes the previously submitted email dated 10/12/19. Please destroy the original submission.

Momentous Consulting Ltd attended the workshop held in Wellington in November and has read the consultation paper. Momentous have had over 20 years involvement in the industry, and were originally involved in the creation of the registry, switching process and several Code applications. In recent years and currently, we have been assisting a number of new entrants into the market and have been involved in the audit process. We have a sound knowledge of operational aspects both the complexities and technical application along with seeing the issues first hand.

We have the following comments we would like to make in response to Q2 and Q3:

We appreciate that this paper concentrates on the switching process, we however would recommend a full review of the registry and functions take place. It has been some years since the registry came into play and while some changes have been incorporated no full review has taken place. Considerations of a full review:

- What does the industry want from the registry? It was evident at the forum that there are requirements from different participants that need to be considered on the registry.
- At what stage should other participants be involved in the switch process e.g. MEPs. MEPs only have notification once the switch has completed, this does not allow sufficient time for preparation of required meter readings. Often these are in process only to not be required due the switch being with-drawn. Our suggestion in this instance is to allow notifications to MEPs at the "NT" stage through to final acceptance of the switch. This will permit MEPs to be informed in a timelier manner and be more aware of event dates.
- Should readings be populated on the registry? This suggestion goes right back to the commencement of designing the registry and through several iterations of Code changes. As is done internationally we suggest the registry consider again the population of readings against an ICP on the registry. We believe this would allow for more accuracy and transparency. It would greatly assist new entrants.
- Time slicing of events and same day transactions.
- Inclusion of metering on LE and SB ICPs. This information is presently contained on the NSP table held by the RM, this would be more transparent and easier to locate the required information. It would also assist the updating of information as the process is already embedded in MEPs daily transactions for other metering information.

- Agent on the registry, processing of registry, reconciliation and switch functions are often done by agents. The addition of an agent's code on the registry would assist to follow up where errors or need for assistance should be addressed. This would save time in the communication process.
- Simplify not just switch time frames but all other participant required time frames so these are more consistent. There are many timeframes that were created to allow for old technology, e.g. meter readings which are now available as soon as daily. Are the registry population and switch time frames now reflective of new technology? We believe they are not, this has been discussed in some areas of the paper but needs to be reviewed for all registry transactions.
- Future proofing, a full review is fundamental in deciding if the registry is fit for another 10 years. Does switching need to move to register level to take into account EV, Solar and heating for instance.
- Expand text fields to allow for better communication and eliminate need for emails. Will provide history when ICP changes hands.

Brief responses directly to the consultation paper:

In all cases we support the Authorities recommended options, in particular we comment on the following:

2.2 to 2.4 Completely agree with the statements made in these sections. As noted above a full review of the registry is required to allow for better application of advancing technology and automation in participants systems.

Issue 1. We fully support the gaining trader to be able to determine the event date. Only in exceptional circumstances should the losing trader be able to provide a different date. Where there is an issue, use of the withdrawal process should address the issue. We therefore support option 1.

Issue 2. We agree with the Authorities preferred options

Issue 5. Our suggestion to hold meter readings on the registry could address the issue and several other issues.

Issue 6. Support option 1.

Issue 9. Support making time frames more consistent.

Issue 11. Support the option 1

Issue 19. Support option 1

Issue 20. Clause 5(b) schedule 11.2 requires that the applicant distributor must give the Authority confirmation that that the applicant distributor has received written consent to the proposed transfer from – (b) every trader who trades electricity at any ICP nominated at the time of notice as being supplied from the same NSP to which the notice relates.

This issue is described in section 5 (para 5.5) of the paper. Having assisted several embedded networks creations, we have found this to be the most frustrating process. Traders deliberately or just finding this a low priority, creating costly delays, halting or evening preventing the embedded network occurring for no valid reason. We understand the reasons behind the intent as described in the paper, however in most cases these are not the reasons the trader delays or denies to provide consent.

We support option 1, however suggest adding to the Code that if a trader declines to accept the

transfer of ICPs they must provide the reason in writing to the applicant distributor within a reasonable time frame so the applicant distributor is given the ability to work through the issue.

Issue 25. Support option 1

We apologise for brief response due to time constraints.

Kind regards

Chrissy

Chrissy Burrows

Director/Consultant