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## TRUSTPOWER SUBMISSION: SWITCH PROCESS REVIEW – ISSUES WITH THE ICP SWITCHING PROCESSES AND POSSIBLE OPTIONS TO ADDRESS THESE ISSUES

### 1 Introduction and background

#### 1.1 Introduction

- 1.1.1 Trustpower Limited (**Trustpower**) welcomes the opportunity to provide a submission to the Electricity Authority (**the Authority**) on its *Switch Process Review – issues with the ICP switching processes and possible options to address these issues* consultation paper (**the Consultation Paper**).
- 1.1.2 The Authority considers the current installation control point (**ICP**) switching processes to be causing operational inefficiencies and may be limiting competition in the electricity industry.<sup>1</sup> To ensure the current processes are still fit for purpose the Authority has sought feedback from the relevant industry participants.
- 1.1.3 The Consultation Paper identifies 29 perceived issues with the current ICP switching processes outlined in the Electricity Industry Participation Code (**the Code**) and seeks feedback, not only on the description and materiality of the issues themselves, but also on the proposed options for resolving them.
- 1.1.4 Following this round of consultation, we note that the Authority anticipates two workstreams of the Switch Process Review project to be progressed:
  - (a) a ‘quick wins’ proposal that encompasses quick fixes that could be included in a Code amendment relatively quickly; and
  - (b) a further consultation period, and subsequent Code amendment proposal, for the more complex ICP switching issues.

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<sup>1</sup> The Consultation Paper, [2019] Electricity Authority, p. 9

## 1.2 Background

- 1.2.1 The issues identified and options proposed in the Consultation Paper are based on feedback received from industry participants through prior work on the Switch Process Review project.
- 1.2.2 A Switch Technical Group (**STG**) was inaugurated by the Authority in late 2017 to facilitate discussion and provide advice around issues with ICP switching processes and amendments that needed to be made. The membership was comprised of representatives from retailers, metering equipment providers (**MEPs**), and other relevant bodies.
- 1.2.3 The Authority commenced its first round of consultation on this subject matter in September 2018 by issuing its *Switch Process Review – issues with the ICP switching processes – issues paper to develop a proposal for future code amendment* consultation paper (**the 2018 Issues Paper**).
- 1.2.4 Trustpower has previously commented on ICP switching processes through our participation in the STG and in our response to the 2018 Issues Paper.<sup>2</sup>

## 2 Overview of submission

- 2.1.1 Trustpower notes that this is primarily a technical consultation paper and the content included therein is very detailed and specific.
- 2.1.2 We note that the Authority has asked two sets of questions:
  - (a) questions 1 through 5 refer to the Consultation Paper as a whole and are generic in nature; and
  - (b) questions 6 through 13 are applicable to each of the 29 individual issues and are more technical in nature.
- 2.1.3 Our submission has been structured to provide:
  - (a) details of our general views and suggestions regarding the Consultation Paper and consultation process for the Authority's consideration in this letter; and
  - (b) responses to all 13 questions, proposed in the Consultation Paper, in Appendix A
 Note that our responses to questions 6 through 13 are answered with respect to each of the 29 issues the Authority has raised.

## 3 Trustpower's views

- 3.1.1 Trustpower thanks the Authority for the opportunity to provide our views on the matters raised in the Consultation Paper.

### 3.2 Evidence-based decision making

- 3.2.1 As the Authority is aware, Trustpower strongly supports evidence-based decision making.
- 3.2.2 We have expressed concerns in the past regarding the Authority's desire to change the rule book proactively.<sup>3</sup> A cautious and balanced approach is required to ensure the Authority, as the regulator, does not 'lead' the market but rather responds to it as and when required.<sup>4</sup>

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<sup>2</sup> Refer to Trustpower's Submission on the 2018 Issues Paper, available online at <https://www.ea.govt.nz/development/work-programme/operational-efficiencies/market-enhancement-omnibus/consultations/#c17638>

<sup>3</sup> Trustpower submission on *Multiple Trading Relationships – How can consumers choose multiple electricity service providers*, [2017] Electricity Authority, p. 5

<sup>4</sup> *ibid*

- 3.2.3 In our view, some of the questions contained within the Consultation Paper appear to be anticipatory of matters that may impact the evolution of the market in the medium/long term (and do not appear necessary at this time).
- 3.2.4 We fully support the Authority ensuring there is clear evidence of the need for a change to the ICP processes before making any decisions to amend the Code as part of this consultation.
- 3.2.5 Proposed changes to the Code should be initiated by the industry as a result of experience, not speculation.
- 3.2.6 To this end, we support the Authority engaging with, and seeking the advice of, the STG in preparation for the release of the Consultation Paper.<sup>5</sup>

### 3.3 Transparency of advisory group processes

- 3.3.1 We ask that the Authority maintains greater transparency around its advisory groups as it is not clear, from the Authority's website, that the STG met during the 2019 calendar year to discuss the Switch Process Review project.<sup>6</sup>
- 3.3.2 We ask that the meeting papers and minutes from any advisory group meetings are published on the Authority's website regularly. This enables the rest of the industry to be aware of what is being discussed and is particularly important for those participants who do not have a representative in the STG membership.
- 3.3.3 The Authority has also previously indicated that, going forwards, they will be looking at alternative, less 'formal' ways of consulting with the industry. We consider the use of technical advisory groups to be one such method that, in Trustpower's view, has proven to be effective.
- 3.3.4 Overall, the better the transparency of the undertakings of these groups, the more efficient any related consultation process will be.

For any questions relating to the material in this submission, please contact me on 07 572 8517 or 027 201 3917, or Tom Kennerley, Advisor Strategy & Regulation on 027 810 3326.

Regards,



**JO ANDREWS**  
**TEAM LEADER – PROVISIONING**

<sup>5</sup> The Consultation Paper, [2019] Electricity Authority, p. ii

<sup>6</sup> Refer to <https://www.ea.govt.nz/development/advisory-technical-groups/stg/meeting-papers/>. No meeting papers for the STG have been published since February 2018.

## Appendix A: Responses to consultation questions

| General comments   |   |
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| Question   | Response  |
| 1. Which, if any, of the 29 issues raised in this paper do you consider should <u>not be</u> investigated further? Please give reasons.  | We consider that issues 6, 8, 14, 16, 18, 20, 21, 22, 24, and 29 do not need to be investigated further as we do not consider them to be material. Please refer to our responses to Question 7.   |
| 2. Are there any issues not raised in this paper that you consider should be investigated? Please identify these other issues and give reasons why they should be investigated.                              | We have not identified any additional issues for consideration at this time.  |
| 3. Do you consider the ICP switching processes set out in the Code, together with the amendments discussed in this paper, are likely to remain fit for purpose over the next ten years? Please give reasons. | At this time, we are unable to determine the degree to which the current ICP switching processes, and the proposed amendments in the Consultation Paper, are future-proofed and will remain fit-for-purpose over the course of the next ten years.                |
| 4. Should any alternative ICP switching processes be considered in the longer term? Please give reasons and outline an alternative.  | We do not have any specific views on this matter but suggest that further ongoing discussion around alternative ICP switching processes would be well suited to discussion by the STG.  |
| 5. Should the registry be modified to enable event maintenance to be conveyed via an application programming interface ( <b>API</b> )? Please give reasons.  | Yes. Trustpower currently converses with the electricity registry via a file transfer protocol ( <b>FTP</b> ). Our view is that, in the future, communication with the electricity register through an API would be preferable to using the existing FTP process. |

For each issue 1 to 29

6. Do you agree with the description of the issue?  
Please give reasons.

**Issue 1:** Yes, Trustpower concurs with the description of the issue as presented by the Authority. We believe that the losing trader and the gaining trader should be using the same ICP switch event date to prevent inconsistency and operational inefficiency.

**Issue 2:** Yes, Trustpower concurs with the description of the issue as presented by the Authority. We agree that replacing and/or modifying metering installations on the trader ICP switch event date is difficult.

**Issue 3:** Yes, Trustpower concurs with the description of the issue as presented by the Authority. We agree that, as a gaining trader, we encounter difficulties ensuring accurate switch event meter readings for category 1, 2 and 9 metering installations. It may, however, be just as simple to prevent revised reading requests for transfer switches totalling less than 50 kWh. It is inefficient for retailers to be spending significant time and resources going backwards and forwards with each other for such small net benefit. If midnight readings are used, this will eliminate the problems that the Authority is trying to address in this issue.

**Issue 4:** Yes, Trustpower concurs with the description of the issue as presented by the Authority. We also consider that a gaining trader is likely to face a delay prior to receiving the first AMI meter reading for the ICP it has gained.

**Issue 5:** Yes, Trustpower concurs with the description of the issue as presented by the Authority. AMI switch event meter readings are not necessarily midnight meter readings.

**Issue 6:** No, Trustpower does not agree with the description of the issue. We believe this is just a data gathering exercise and is unlikely to deliver value to consumers or industry participants.

**Issue 7:** Yes, Trustpower concurs with the description of the issue as presented by the Authority. We agree that there is no mechanism to identify the sale and transfer of mass consumer or embedded generator accounts between traders. It is a good idea to try and address the issues currently faced:

- (a) the move-in switch type is being used for bulk transfer gains so a date can be selected by the gaining retailer; and

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|  | <p>(b) the inability to identify these mass ICP transfers and allow back-dating if required (and agreed) between both retailers.</p> <p><b>Issue 8:</b> No, Trustpower does not agree with the description of the issue. We consider the current rules for acknowledging trader ICP switch request notifications to be meeting their intended purpose and do not require changing. We do not see any value or benefit in ‘fixing’ something that is not ‘broken’.</p> <p><b>Issue 9:</b> Yes, Trustpower concurs with the description of the issue as presented by the Authority. In theory, the principle of the issue is valid however we do not believe the table of times for different switch types contains a solution to the problem. We agree that timeframes across switching activities should be aligned but we find it difficult to visualise how this will work in the industry, especially given the current rules around future-dated move-ins and the inability to back-date transfer switches. Trustpower has already incurred costs on this matter so further changes, although possibly simplifying the process, will cause us to incur unwanted additional costs.</p> <p><b>Issue 10:</b> Yes, Trustpower concurs with the description of the issue as presented by the Authority. We consider that the trader ICP switch withdrawal process, in its current form, contains multiple operational inefficiencies.</p> <p><b>Issue 11:</b> Yes, Trustpower concurs with the description of the issue as presented by the Authority. Different timeframes for applying a meter reading to a non-half-hour (NHH) ICP switch do add complexity to the trader ICP switching process.</p> <p><b>Issue 12:</b> Yes, Trustpower concurs with the description of the issue as presented by the Authority. We agree that, at times, we cannot obtain switch event meter readings despite best endeavours.</p> <p><b>Issue 13:</b> Yes, Trustpower concurs with the description of the issue as presented by the Authority. It can be frustrating that registry functionality prevents losing traders from updating an ICP identifier during a switch.</p> <p><b>Issue 14:</b> No, Trustpower does not agree with the description of the issue. We consider the status quo to be acceptable and workable.</p> <p><b>Issue 15:</b> Yes, Trustpower concurs with the description of the issue as presented by the Authority. The replacement read process is inefficient in its current form.</p> <p><b>Issue 16:</b> No, Trustpower does not agree with the description of the issue. We consider the status quo to be acceptable and workable.</p> |
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|  | <p><b>Issue 17:</b> Yes, Trustpower concurs with the description of the issue as presented by the Authority. We believe that, in some cases, a gaining retailer can put obligations on the current trader by electrically connecting an ICP before the trader ICP switch completes. We do not believe the proposed Option, in its current form, is a suitable solution to this problem, however.</p> <p><b>Issue 18:</b> No, Trustpower does not agree with the description of the issue. We consider the status quo to be acceptable and workable.</p> <p><b>Issue 19:</b> Yes, Trustpower concurs with the description of the issue as presented by the Authority. We believe that the calculation of average daily consumption should be standardised across the industry.</p> <p><b>Issue 20:</b> No, Trustpower does not agree with the description of the issue. We do not consider this issue to occur frequently enough to warrant any change. We believe the status quo to be acceptable and workable at this time.</p> <p><b>Issue 21:</b> No, Trustpower does not agree with the description of the issue. We believe network extensions are a contractual matter between the network company and the building owner.</p> <p><b>Issue 22:</b> No, Trustpower does not agree with the description of the issue. We consider the status quo to be acceptable and workable.</p> <p><b>Issue 23:</b> Yes, Trustpower concurs with the description of the issue as presented by the Authority. The provision of initial metering data is not always timely.</p> <p><b>Issue 24:</b> Yes, Trustpower concurs with the description of the issue (as presented by the Authority) in principle. The concept of standardising meter reading file formats is a good one however, we consider the status quo to be acceptable and workable. Trustpower has already expended considerable time and resources on building workarounds to accommodate the different MEP read formats.</p> <p><b>Issue 25:</b> Yes, Trustpower concurs with the description of the issue as presented by the Authority. Gaining and losing MEPs cannot currently use the same MEP event date for an MEP switch.</p> <p><b>Issue 26:</b> Yes, Trustpower concurs with the description of the issue as presented by the Authority. We agree that registry metering records do not differentiate between different types of metering and this should be resolved.</p> |
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|                                | <p><b>Issue 27:</b> Yes, Trustpower concurs with the description of the issue as presented by the Authority. MEPs not updating the registry to record the removal of a metering component can cause safety issue and is operationally inefficient.</p> <p><b>Issue 28:</b> Yes, Trustpower concurs with the description of the issue as presented by the Authority. The time taken by some MEPs to update registry metering records affects ICP switching and is inefficient.</p> <p><b>Issue 29:</b> No, Trustpower does not agree with the description of the issue. We consider the status quo to be acceptable and workable.</p>  |
| 7. How material is this issue? | <p><b>Issue 1:</b> Trustpower believes that this issue is material and should be addressed.</p> <p><b>Issue 2:</b> Trustpower believes that this issue is material and should be addressed.</p> <p><b>Issue 3:</b> Trustpower believes that this issue is material and should be addressed.</p> <p><b>Issue 4:</b> Trustpower believes that this issue is material and should be addressed.</p> <p><b>Issue 5:</b> Trustpower believes that this issue is material and should be addressed.</p> <p><b>Issue 6:</b> Trustpower believes that this issue is not material, does not warrant any expense of time or resources to be incurred in making changes, and is not a problem for Trustpower at this current time.</p> <p><b>Issue 7:</b> Trustpower believes that this issue is material and should be addressed.</p> <p><b>Issue 8:</b> Trustpower believes that this issue is not material, does not warrant any expense of time or resources to be incurred in making changes, and is not a problem for Trustpower at this current time.</p> <p><b>Issue 9:</b> Trustpower believes that this issue is material and should be addressed, however, do not see the Authority's proposed solution being viable without causing us to incur additional costs.</p> <p><b>Issue 10:</b> Trustpower believes that this issue is material and should be addressed.</p> <p><b>Issue 11:</b> Trustpower believes that this issue is material and should be addressed.</p> <p><b>Issue 12:</b> Trustpower believes that this issue is material and should be addressed.</p> <p><b>Issue 13:</b> Trustpower believes that this issue is material and should be addressed.</p> <p><b>Issue 14:</b> Trustpower believes that this issue is not material, does not warrant any expense of time or resources to be incurred in making changes, and is not a problem for Trustpower at this current time.</p> |



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|  | <p><b>Issue 15:</b> Trustpower believes that this issue is material and should be addressed.</p> <p><b>Issue 16:</b> Trustpower believes that this issue is not material, does not warrant any expense of time or resources to be incurred in making changes, and is not a problem for Trustpower at this current time.</p> <p><b>Issue 17:</b> Trustpower believes that this issue is material and should be addressed, however, we do not see the Authority's proposed solution being suitable unless changes to the proposed wording are made. These changes are outlined in the section on Issue 17 under question 10.</p> <p><b>Issue 18:</b> Trustpower believes that this issue is not material, does not warrant any expense of time or resources to be incurred in making changes, and is not a problem for Trustpower at this current time.</p> <p><b>Issue 19:</b> Trustpower believes that this issue is material and should be addressed.</p> <p><b>Issue 20:</b> Trustpower believes that this issue is not material, does not warrant any expense of time or resources to be incurred in making changes, and is not a problem for Trustpower at this current time.</p> <p><b>Issue 21:</b> Trustpower believes that this issue is not material, does not warrant any expense of time or resources to be incurred in making changes, and is not a problem for Trustpower at this current time.</p> <p><b>Issue 22:</b> Trustpower believes that this issue is not material, does not warrant any expense of time or resources to be incurred in making changes, and is not a problem for Trustpower at this current time.</p> <p><b>Issue 23:</b> Trustpower believes that this issue is material and should be addressed.</p> <p><b>Issue 24:</b> Trustpower believes that this issue is not material, does not warrant any further expense of time or resources to be incurred in making additional changes, and is not currently a problem for Trustpower. Trustpower has already incurred considerable cost adapting our systems and processes to accommodate the various file formats and, consequently, do not require any changes to be made at this time.</p> <p><b>Issue 25:</b> Trustpower believes that this issue is material and should be addressed.</p> <p><b>Issue 26:</b> Trustpower believes that this issue is material and should be addressed.</p> <p><b>Issue 27:</b> Trustpower believes that this issue is material and should be addressed.</p> <p><b>Issue 28:</b> Trustpower believes that this issue is material and should be addressed.</p> <p><b>Issue 29:</b> Trustpower believes that this issue is not material, does not warrant any further expense of time or resources to be incurred in making additional changes, and is not currently a problem for</p> |
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|  | Trustpower. Trustpower already undertakes the necessary actions regarding notifying the registry manager of an MEP switch. Those where we don't are usually out of our control.  |
| 8. Where there are multiple options, rank your preference for the options starting at 1 for preferred. | <p><b>Issue 1:</b> Rank 1: Option 2, Rank 2: Option 1.</p> <p><b>Issue 2:</b> Rank 1: Option 1 (we have not allocated ranks to Options 2 and 3).</p> <p><b>Issue 3:</b> Rank 1: Option 6 and Option 2(a) only (we have not allocated ranks to Options 1, 3, 4, and 5).</p> <p><b>Issue 4:</b> Not applicable as only one option provided.</p> <p><b>Issue 5:</b> Rank 1: Option 2 (we have not allocated ranks to Options 1, 3, 4, and 5).</p> <p><b>Issue 6:</b> No options have been ranked as we do not consider this to be a problem that needs to be addressed at this current time.</p> <p><b>Issue 7:</b> Rank 1: Option 3 (we have not allocated ranks to Options 1 and 2).</p> <p><b>Issue 8:</b> No option has been ranked as we do not consider this to be a problem that needs to be addressed at this current time.</p> <p><b>Issue 9:</b> Not applicable as only one option provided.</p> <p><b>Issue 10:</b> Rank 1: Options 2 and 6 (we have not allocated ranks to Options 1, 3, 4, and 5).</p> <p><b>Issue 11:</b> Not applicable as only one option provided.</p> <p><b>Issue 12:</b> Rank 1: Option 1, Rank 2: Option 2.</p> <p><b>Issue 13:</b> Rank 1: Option 1, Rank 2: Option 2.</p> <p><b>Issue 14:</b> Not applicable as only one option provided.</p> <p><b>Issue 15:</b> Rank 1: Options 1, 2, 3, and 8 (we have not allocated ranks to Options 4, 5, 6, and 7).</p> <p><b>Issue 16:</b> Not applicable as only one option provided.</p> <p><b>Issue 17:</b> Not applicable as only one option provided.</p> <p><b>Issue 18:</b> Not applicable as only one option provided.</p> <p><b>Issue 19:</b> Rank 1: Option 2, Rank 2: Option 1.</p> |

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|   | <p><b>Issue 20:</b> Not applicable as only one option provided.</p> <p><b>Issue 21:</b> Not applicable as only one option provided.</p> <p><b>Issue 22:</b> No options have been ranked as we do not consider this to be a problem that needs to be addressed at this current time.</p> <p><b>Issue 23:</b> Rank 1: Option 3 (we have not allocated ranks to Options 1, 2 and 4).</p> <p><b>Issue 24:</b> No option has been ranked as we do not consider this to be a problem that needs to be addressed at this current time.</p> <p><b>Issue 25:</b> Rank 1: Option 1, Rank 2: Option 2.</p> <p><b>Issue 26:</b> Rank 1: Option 2, Rank 2: Option 1.</p> <p><b>Issue 27:</b> Rank 1: Option 1, Rank 2: Option 2.</p> <p><b>Issue 28:</b> Not applicable as only one option provided.</p> <p><b>Issue 29:</b> Not applicable as only one option provided.</p> |
| 9. Are there any advantages or disadvantages that are not included for each option? | <b>Issues 1-29:</b> We have not been able to assess whether there are any advantages or disadvantages that have not been included in the options proposed by the Authority.   |
| 10. Are there any foreseen implementation issues?                                   | <p><b>Issue 1:</b> Trustpower supports the proposal that a gaining trader can propose a switch event date. The gaining trader, however, must be restricted to selecting the switch date to be at least the next business day.</p> <p><b>Issue 2:</b> We do not foresee any implementation issues for our preferred Option 1.</p> <p><b>Issue 3:</b> We do foresee some implementation issues with some of the options proposed by the Authority, particularly with our preferred options.</p> <p>(a) regarding Option 6, our comments are that standardised rounding is necessary based on how the majority of systems within the industry work at the current time.</p>  |

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|  | <p>(b) regarding Option 2, we support clause (a) only. If a kWh threshold of 50 is put in place as suggested, and revised reading requests no longer frequently required, then clause (b) will just cause unnecessary costs to retailers.</p> <p>(c) <b>Issue 4:</b> We do not foresee any implementation issues for Option 1.</p> <p><b>Issue 5:</b> We do not foresee any implementation issues for our preferred Option 2.</p> <p><b>Issue 6:</b> As we do not consider this to be an issue needing a resolution, none of the options presented are favoured by Trustpower as they would likely involve the expense of time and/or resources.</p> <p><b>Issue 7:</b> We do not foresee any implementation issues for our preferred Option 3. We do wish to make the comment that it is essential that we can choose a date as described in Issue 1.</p> <p><b>Issue 8:</b> As we do not consider this to be an issue needing a resolution, none of the options presented are favoured by Trustpower as they involve the expense of time and/or resources.</p> <p><b>Issue 9:</b> As per our comments in the section relating to Issue 9 under questions 6 and 7, we do not see how the Authority's proposed solution addresses the problem. We suggest the Authority re-examines this issue.</p> <p><b>Issue 10:</b> We do not foresee any implementation issues with Option 6. If Option 2 is progressed, we suggest a timeframe to be introduced for the withdrawal agreement responses. We propose that agreeance to the withdrawal by both retailers is only required if the timeframe exceeds two months (as is the status quo). If the timeframe does not exceed two months, then we suggest no agreeance is required between the losing and gaining retailers for the withdrawal to proceed.</p> <p><b>Issue 11:</b> Trustpower does not foresee any issues with implementing this option. Trustpower's approach to deeming when an NHH switch event meter reading applies is compliant with the requirements of the current Code. As this change will affect many parties, we suggest that the Authority contacts all impacted industry participants and elects the option that matches how most of the industry already operates. If most of the industry follows the current Code, then we suggest any parties whose systems operate differently should be required to align their systems with the majority. If most industry participants currently comply with the proposed requirements of Option 1, then any party that does not should be required to amend their systems accordingly. If it eventuates that Trustpower is not in the majority then we can amend our systems to match the Option 1 proposal in the Consultation Paper.</p> <p><b>Issue 12:</b> We do not foresee any implementation issues for our preferred Option 1.</p> |
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|  | <p><b>Issue 13:</b> We do not foresee any implementation issues for our preferred Option 1.</p> <p><b>Issue 14:</b> As we do not consider this to be an issue needing a resolution, the option presented is not favoured by Trustpower as it would likely involve the expense of time and/or resources.</p> <p><b>Issue 15:</b> Trustpower believes all the options that we have ranked are favourable but the most appropriate one to progress will depend on the decisions made around Issues 1 and 7. We do foresee some implementation issues with two of our preferred options:</p> <ul style="list-style-type: none"> <li>(a) regarding Option 2, we feel that the threshold of +/-1kWh is too small and this should be increased. We believe a more appropriate figure should be 50kWh. This will ensure industry participants are not expending substantial time and resources for such little net benefit. This would be inefficient.</li> <li>(b) regarding Option 8, we feel the time period within which a replacement read can be requested be extended to 14 months because it aligns with the current settlement process. We also suggest that both losing and gaining retailers must agree on this replacement read request via email. Trustpower believes that a timeframe for responses (from retailers) also needs to be introduced to prevent unnecessary delays and inefficiency.</li> </ul> <p><b>Issue 16:</b> As we do not consider this to be an issue needing a resolution, the option presented is not favoured by Trustpower as it would likely involve the expense of time and/or resources. We believe the proposed changes could cause more problems than they solve.</p> <p><b>Issue 17:</b> We do not foresee any implementation issues with the only proposed solution, Option 1 but do believe the wording of the proposed change needs to be amended. It is our view that, if a gaining trader electrically connects an ICP (either in error, presumptively before a switch is finalised, or for any other reason) the gaining trader must now be responsible for this ICP. The gaining trader should be obligated to keep the site if the losing retailer does not want to take back responsibility of the site. It is not logical for a gaining trader to make the error in connecting the ICP, realise their mistake, and then withdraw from the switch forcing everything back on the losing retailer. If a mistake is made by the gaining retailer, they need to 'own it'. We believe the wording of the proposed change should be amended to include a requirement that the losing retailer must agree to accept the site back, otherwise responsibility remains with the gaining retailer.</p> |
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|  | <p><b>Issue 18:</b> As Trustpower does not consider this to be an issue needing a resolution, the option presented is not favoured by Trustpower. If a situation arises where there are two switch events on the same date, following our current process Trustpower usually withdraws the switch request after discussion with the other retailer.</p> <p><b>Issue 19:</b> We do not foresee any implementation issues for our preferred Option 2. We would like to comment that Option 2 makes the provision of an average daily consumption value optional and, if this value is provided, it must be accurate. This does not seem an efficient process. To avoid any culpability over inaccurate information and breaching the Code, the retailer is incentivised not to provide the information in the first instance. We suggest that the Authority reconsider the wording in this option and ensure they are incentivising the right outcomes.</p> <p><b>Issue 20:</b> As Trustpower does not consider this to be an issue needing a resolution, the option presented is not favoured by Trustpower. We believe that this issue does not occur often enough to warrant the time and/or resources to be expended on making changes to rectify the problem.</p> <p><b>Issue 21:</b> As Trustpower does not consider this to be an issue needing a resolution, the option presented is not favoured by Trustpower. We believe that this matter is a contractual issue and lies with the network company and the building owner where applicable. Trustpower, as a retailer, does not need visibility of the network extension.</p> <p><b>Issue 22:</b> As Trustpower does not consider this to be an issue needing a resolution, the options presented are not favoured by Trustpower. We do not encounter any issues with the current process.</p> <p><b>Issue 23:</b> We do not foresee any implementation issues for our preferred Option 3.</p> <p><b>Issue 24:</b> As Trustpower does not consider this to be an issue needing a resolution, the options presented are not favoured by Trustpower. We do not encounter any issues with the current process having already taken steps to mitigate the effects of this issue on the business.</p> <p><b>Issue 25:</b> We do not foresee any implementation issues for our preferred Option 1.</p> <p><b>Issue 26:</b> Although this issue should be addressed, we believe that MEPs already struggle to operate within the current rules in their current form. We consider that increasing thresholds considerably, as is proposed, will do nothing to address the current limitations MEPs face. The introduction of an 'Intermittent Flag' could add value, however this is likely to be of low value to retailers (such as Trustpower).</p> |
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|  | <p><b>Issue 27:</b> We do not foresee any implementation issues for our preferred Option 1.</p> <p><b>Issue 28:</b> We do not foresee any implementation issues for Option 1.</p> <p><b>Issue 29:</b> Trustpower already undertakes the necessary actions as required and believes that reducing the five-business-day timeframe will not have any material change to the number of switches that have to be withdrawn as a result of metering issues. There are some scenarios whereby we are not aware of field works occurring until paperwork, or a request to nominate an MEP is received, but Trustpower does not have any control over this. A possible implementation issue for this option is that making the changes as proposed in Option 1 may only serve to lower Trustpower's (and possibly other retailer's) compliance rating.</p>  |
| 11. Can you give an indication of cost and benefit?  | <p><b>Issues 1-29:</b> We have not had sufficient time to adequately and accurately assess the costs and/or benefits for all of the proposed issues.</p>  |
| 12. Which, if any, options for changing the ICP switching processes do you consider should be fast tracked? Please give reasons. | <p><b>Issue 1:</b> We consider Option 2 should be fast-tracked and treated as a 'quick win'. Trustpower believes that this option should be easy to implement, and it benefits the electricity industry to resolve this issue. This is subject to the proviso that the gaining trader can only select the switch event date as the next business day.</p> <p><b>Issue 2:</b> We consider Option 1 should be fast-tracked and treated as a 'quick win'. Although this is a relatively small issue for Trustpower, we see value in getting this fix fast-tracked.</p> <p><b>Issue 3:</b> We consider Option 6 or Option 2 (a) should be fast-tracked and treated as a 'quick win'. Trustpower believes that these options should be relatively easy to implement and will benefit the electricity industry.</p> <p><b>Issue 4:</b> We consider Option 1 should be fast-tracked and treated as a 'quick win'. We expect costs of implementation to be modest.</p> <p><b>Issue 5:</b> We consider Option 2 should be fast-tracked and treated as a 'quick win'.</p> <p><b>Issue 10:</b> We consider Option 2 or Option 6 should be fast-tracked and treated as a 'quick win'.</p> <p><b>Issue 12:</b> We consider Option 1 should be fast-tracked and treated as a 'quick win'.</p> |

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| <p>13. Which, if any, options for changing the ICP switching processes do you consider could be implemented using a combination of a fast-tracked option, followed by a more substantial change at a later time? Please give reasons.</p> | <p><b>Issues 1-29:</b> Trustpower is not commenting on this question at this time.</p> |
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