Code review programme #7 submission form

Clarify that several points of connection may be recorded under a single ICP

Submitter	**David Barnett**
Organisation	**Intellihub Limited**
Proposal number	**CRP7-005**

Questions	Comments
Q1. Do you agree the issue(s) identified by the Authority need attention? Any comments?	No. Comments: The problem definition correctly states the obligation that each ICP has a single connection point, so there is no uncertainty under the Code. The problem definition states that in practice an ICP can consist of more than one physical point of connection to the network. This is incorrect and is now adding consumer ownership instead of electrical connection properties for the definition of an ICP.
Q2. Do you agree with the objectives of the proposed amendment? Any comments?	No Comments There is no evidence provided that this proposal is beneficial or cost effective and may in fact end up being the opposite.
Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Any comments?	No. Comments: There may be some benefit to consumers but there are also risks associated with the proposal as per question 6. The registry does not cater for multiple points of connection for an ICP, and their would-be costs associated to allow for multiple points of connection per ICP.
Q4. Do you agree the proposed amendment is preferable to any other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objectives in section 15 of the Electricity Industry Act 2010.	No. Details of your preferred option: Do not make any changes and retain the current rules where each ICP only has one point of connection.

Q5. Do you have any comments on the drafting of the proposed amendment?	IHUB does not agree with the problem definition.
Q6. Do you have any further comments on the proposal?	IHUB have identified two major issues with the code that need to be taken into consideration before any changes could be made. 1. The code was designed for a point of connection to have an individual ICP to ensure electrical safety standards can be met when disconnecting and connecting an ICP as per Schedule 11.1- 3. Having many points of connection per ICP could cause issues of not totally disconnecting or connecting ICPs and possible electrocution of a contractor or consumer. 2. The registry only caters for one address per ICP and does not contain point of connection details or locations. There would need to be registry and participants system changes to allow for multiple points of connection and addresses per ICP. This would be a considerable cost to all participants.
Q7. Is any part of your submission confidential? If yes, please explain which part, why it is confidential and provide a publishable replacement (refer paragraphs 1.10 to 1.12 of the consultation paper)	No

Require action when insufficient load to certify metering

Submitter	**David Barnett**
Organisation	**Intellihub Limited**
Proposal number	**CRP7-006**

Questions	Comments
Q1. Do you agree the issue(s) identified by the Authority need attention? Any comments?	Yes. Comments: There are two issues with the insufficient load certification process, as follows: 1. Costs and availability of resources for repeat visits being incurred. 2. Metering not fully certified continuing to operate indefinitely, as stated in this proposal.

	These two issues are discussed further in Q4.
Q2. Do you agree with the objectives of the proposed amendment? Any comments?	No. Comments: Disconnection of the supply to an ICP because the load is insufficient to conduct certification tests is not reasonable in most cases.
Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Any comments?	No. Comments: Costs for repeat site visits for high category sites are not negligible. There will be no benefits if a consumer is disconnected because their load is too low for certification tests to occur, their business may suffer financial harm because it's most likely going to be a new business or a refurbished premise. There are also no clauses in the Code stipulating the conditions for reconnection.
Q4. Do you agree the proposed amendment is preferable to any other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objectives in section 15 of the Electricity Industry Act 2010.	No. Details of your preferred option: As mentioned above, there are two issues associated with insufficient load certification. The issue of repeat visits can be resolved by changing the Code to require the level of load to be "consistently" above the minimum requirements although timing and availability of resources need to be taken into consideration. The second and much larger issue is where the load of a premise may never be sufficient in cases where a premise has a large supply that used to service a high user and where the premise now only has a light load such as lighting. The load may not reach the threshold for testing for the entire certification period. The solution to this issue is to clarify in the Code that metering installations of this nature are not "fit for purpose" and cannot be certified but this will still leave the problem where sites need to be downgraded when recertifying, but this is not able to be achieved due to owner /consumer issues either with costs or not wanting to downgrade existing metering equipment. This leaves the MEP with an uncertified ICP and no option to rectify.
Q5. Do you have any comments on the drafting of the proposed amendment?	As mentioned in Q4, IHUB does not agree with the proposal to disconnect consumers because they have insufficient load to conduct certification tests.

Q6. Do you have any further comments on the proposal?	The assessment the proposed Code amendment against section 32(1) of the Act states: *"The proposed Code amendment is expected to have no effect on competition and the reliable supply of electricity, or the interests of domestic and small business consumers in relation to the supply of electricity to those consumers, or the performance by the Authority of its functions."* This is not correct as the proposal does influence the reliable supply of electricity because it proposes disconnection. IHUB believe there should be more investigation work into the problem of downgrading connections that will not have sufficient load to certify in conjunction with all ICPs that have reasons for being unable to certify outside of the MEPs control. This clause applies to "points of connection" and not ICPs, therefore it also applies to grid connected generation and embedded generation, where insufficient load certification quite often occurs.
Q7. Is any part of your submission confidential? If yes, please explain which part, why it is confidential and provide a publishable replacement (refer paragraphs 1.10 to 1.12 of the consultation paper)	No.