

# Code review programme #7 submission form

## 1. Code amendment proposals

<b>Submitter</b>	
<b>Organisation</b>	<b>Private individual</b>

<b>Proposal number</b>	<b>CRP7-005</b>
Questions	Comments
Q1. Do you agree the issue(s) identified by the Authority need attention? Any comments?	Not sure this is a problem that needs solving.
Q2. Do you agree with the objectives of the proposed amendment? Any comments?	
Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Any comments?	<p>It may cause fewer complications to find some other way of bracketing related ICPs.</p> <p>As a complication for the solution proposed, the selection criteria for some of the audit reports in the Registry Functional Spec will need to be updated. If the additional connection was unmetered, the trader would be required to set the "unmetering is present" flag in the Trader event. There are audit reports (e.g. AC020Trader04, AC020Trader08, AC020Trader09) that use the Trader's "unmetering is present" flag as synonymous with "no meters present". A metered ICP with a second connection that is unmetered would today be treated as wholly unmetered by these reports and audited as such.</p> <p>There will be a consequential need to show other Registry participants that multiple points of connection exist. This need should probably be addressed at the same time otherwise the Authority will need to revisit it. One mechanism compatible with present Registry could be to require meter installation records per connection. If an ICP had more than one meter installation in Registry, that would give a good hint to participants that there is more than one connection. There is a complication that meter installation records are the domain of the MEP, and the MEP is not presently involved if the connection is unmetered.</p>

<p>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.</p>	
<p>Q5. Do you have any comments on the drafting of the proposed amendment?</p>	<p>I recognise that allowing a second connection without creating a new ICP is at the distributor's discretion, and that this would probably be done in full awareness of the limitations:</p> <ul style="list-style-type: none"> <li>• Only one ICP address, so the address of other connection(s) cannot be recorded</li> <li>• Only one ICP status so if one connection is made inactive or is decommissioned, the action must be ignored or the same action must happen to the other connection(s)</li> <li>• Only one Price Category code so there is no ability to record specialised price category codes e.g. water pumps for the other connection(s)</li> <li>• The other connection(s) must be on the same LV circuit as the first: <ul style="list-style-type: none"> <li>○ Only one Loss Category code and POC so these must be the same</li> <li>○ Separation is not handled by EIEP5A or the SAIDI/SAIFI calculation so any outage has to apply to none or all. If we ever need to analyse LV SAIDI, this probably means the connections would need to be on the same LV phase.</li> <li>○ Only one maximum permitted DG export capacity. This parameter is an attribute of the LV circuit (distribution transformer); if the connections are on different transformers they may have different DG constraints but only one can be recorded.</li> </ul> </li> </ul> <p>These limitations may be sufficient to stop the capability being used. Situations I am personally aware of where the facility may have been useful involve a water pump fed from a different pole and fusing than the main supply. This then gives the possibility of a LV open point being introduced between the two connections; not compatible with Registry status and EIEP5A then being the least of the problems.</p>
<p>Q6. Do you have any further comments on the proposal?</p>	

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
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Proposal number	CRP7-008
Questions	Comments
Q1. Do you agree the issue(s) identified by the Authority need attention? Any comments?	<p>Complete agreement and thank you for listening.</p> <p>My only addition would be the observation that backdated status changes for prolonged outage are no different to backdated changes for active/inactive status, trader, price category code etc.</p> <p>If not billed correctly because the underlying data is subsequently revised, this is exactly what the wash-up process is for. It just needs distributors to also wash up fixed charges, with UOMA considerations if the wash-up is tardy.</p>
Q2. Do you agree with the objectives of the proposed amendment? Any comments?	
Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Any comments?	
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.	
Q5. Do you have any comments on the drafting of the proposed amendment?	
Q6. Do you have any further comments on the proposal?	
Q7. Is any part of your submission confidential? If yes, please explain which part, why it is confidential and	No

provide a publishable replacement (refer paragraphs 1.10 to 1.12 of the consultation paper)

Proposal number	<b>CRP7-013</b>
Questions	Comments
Q1. Do you agree the issue(s) identified by the Authority need attention? Any comments?	Complete agreement with the concept, just not the draughting.
Q2. Do you agree with the objectives of the proposed amendment? Any comments?	
Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Any comments?	
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.	
Q5. Do you have any comments on the drafting of the proposed amendment?	<p><i>"for ICPs created after [date], there is reasonable access to enable the ICP to be electrically disconnected..."</i></p> <p>Agree. The issue is the draughting of (i) and (ii).</p> <p>ICPs are the point at which the customer's facility connects to the distributor's network, or where the supply becomes dedicated for that customer, whichever is closer to the customer.</p> <p>For standalone residential dwellings on separate parcels, the ICP is invariably at the property boundary and not the premise. In this situation, subclause (i) fails as the ICP is not located at the premise and subclause (ii) is irrelevant as the technician can simply walk along the road corridor up to the ICP irrespective of permission to access the property.</p> <p>It is also not the owner that needs the right of access; it is the technician. If the owner is a body corporate who denies the distributor's technician access to disconnect one of the tenants, what then? Subclause (ii) guarantees access only for the owner.</p>

	<p>Irrespective of all this, ICPs are not isolation points. Accessing the ICP does not assist; it is an isolation point that needs to be accessed.</p> <p>What the distributor's technician needs reasonable access to is a point of isolation on the customer's side of where supply becomes exclusive for them; ideally adjacent to the point supply becomes exclusive. If this point is a fuse up a pole or a link in a service fuse box or distribution box on the distributor's side of the property boundary, so much the better. If it within the customer's property then the ICP should not be created unless the <u>distributor</u> has reasonable right of access to undertake such isolation e.g. documented in an easement.</p>
<p>Q6. Do you have any further comments on the proposal?</p>	<p>ICP is not synonymous with "premise". iCP is merely a place where ownership of the conductor changes from distributor to customer.</p>
<p>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)</p>	