Veritek Limited Response to Code review programme #7 Consultation Paper

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

Submitter	**Steve Woods**
Organisation	**Veritek 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 accurately states that the definition of "ICP" as 'a point of connection' can be read as limiting an ICP to a single point of connection, therefore there is no uncertainty under the Code about whether multiple points of connection related to a single consumer can constitute a single ICP. The last paragraph of the problem definition states that "In practice, however, an ICP can consist of more than one physical point of connection to the network". This is incorrect because the definition above clarifies that an ICP cannot consist of more than one point of connection.
Q2. Do you agree with the objectives of the proposed amendment? Any comments?	No. Comments: No evidence has been provided that this proposal is beneficial or cost effective.
Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Any comments?	No. Comments: There may be benefits to consumers, however the "costs" are not quantified and do not include the costs associated with the risks associated with the proposal, which are outlined in Q6. There would also be considerable cost associated with changing the registry and participants' systems to accommodate 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	No. Details of your preferred option:

consistent with the Authority's statutory objectives in section 15 of the Electricity Industry Act 2010.	The preferred option is to retain the status quo, where each ICP only has one point of connection.
Q5. Do you have any comments on the drafting of the proposed amendment?	As mentioned in Q4, Veritek does not agree with the problem definition or the proposal.
Q6. Do you have any further comments on the proposal?	This proposal has two major flaws, as follows: 1. The reason the Code requires each point of connection to have an individual ICP is to ensure the safety of electrical industry workers and consumers. If a property has many points of connection associated with one ICP, often with different street addresses, there are likely to be problems with identifying which points of connection relate to each ICP, which in turn could result in some but not all points of connection being disconnected as part of an "ICP disconnection" request. This could result in electrocution of a consumer or worker. The same issue could occur for reconnection, where not all the points of connection are identified and reconnected. 2. The registry only allows one address per ICP and does not contain "point of connection" details or locations. Costs for changing the registry and participants' systems to allow multiple points of connection per ICP and multiple addresses per ICP will be considerable.
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	**Steve Woods**
Organisation	**Veritek 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 three issues with the insufficient load certification process, as follows: 1. Costs of repeat visits being incurred, as mentioned in this proposal. 2. Uncertified metering continuing to operate indefinitely, as mentioned in this proposal. 3. Metering being installed but not certified by Approved Test Houses where there is insufficient load. These three 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 and is not the only option available. This is discussed further in Q4
Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Any comments?	No. Comments: There will be minor cost savings, but these are unknown because the number of unsuccessful re-visits is not quantified. I suggest the number of re-visits is very low. There is a wider issue to be considered, and its implications are far greater than a small cost saving. 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. Furthermore, there are 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	No. Details of your preferred option:

explain your preferred option in terms consistent with the Authority's statutory objectives in section 15 of the Electricity Industry Act 2010.	As mentioned above, there are three 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. This will assist with the issue of uncertified metering continuing to operate indefinitely, however there is another much larger issue in relation to this, 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. The third issue is that there are a large number of instances where Approved Test Houses install metering for new connections, but they don't conduct certification due to insufficient load. This causes the trader to be non-compliant, but the Approved Test Houses are compliant, and the Metering Equipment Providers are compliant, because the Code does not place any responsibilities on them for this scenario. I suggest that Approved Test Houses and Metering Equipment Providers should have responsibilities under the Code as soon as a trader notifies them of the need for metering at an ICP.
Q5. Do you have any comments on the drafting of the proposed amendment?	As mentioned in Q4, Veritek 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 clearly incorrect. The proposal does have an effect on the reliable supply of electricity and the interests of consumers in relation to supply of electricity, because it proposes disconnection when there are other courses of action that can be taken. It should also be noted that 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	No.

(refer paragraphs 1.10 to 1.12 of the consultation paper)	