

Date: 18 May 2022

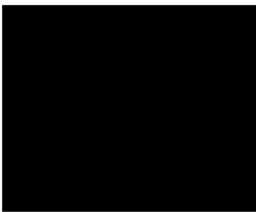
Consultation Paper – TPM-related Code amendments
c/o TPM@ea.govt.nz

Submitter: Roger Jones, GM Pulp, Pan Pac Forest Products

Question	Comment
<p>Q1. Do you agree with the Authority's proposal to enable Transpower to access additional information to more accurately calculate gross energy?</p>	<p>Q1. Pan Pac agree that customers should provide behind-the-GXP generation data so that the residual charge and transitional cap can be accurately calculated.</p> <p>Pan Pac has voluntarily provided the data. As there is no specific requirement for revenue based metering it should be noted that this data may not be "revenue" quality or fully complete (some missing data).</p> <p>Pan Pac do not agree with the proposed fallback mechanism of using the generator capacity if there is missing or unsuitable generation quantities. Pan Pac's own data shows the assumption in paragraph 2.2 is not, in Pan Pac's case, reasonable. Pan Pac also disagrees with paragraph 2.25, on the basis that assuming generation at capacity is more arbitrary than using some other estimate of the generation. At the extreme, assuming generation at capacity could lead to estimates of load that are overstated by as much as the full generation capacity; that is the actual load peak (without generation) + generation capacity.</p> <p>Further, as the peak grid off-take is more likely to occur when generation is low (or zero), using generation capacity as a fallback value is not appropriate.</p>
<p>Q2. Do you agree with the Authority's proposal to allow the system operator to disclose information to Transpower that is needed to calculate transmission charges?</p>	<p>Q2. Yes.</p>
<p>Q3. Do you agree that the process requirements in Subpart 4 should not apply to amendments to the TPM that are technical and non-controversial, or where there is widespread support, or adequate prior consultation?</p>	<p>Q3. No comment.</p>

<p>Q4. Do you agree that the process requirements in Subpart 4 should not apply to amendments to the TPM that are desirable in the public interest to be made urgently?</p> <p>Q5. Do you agree with the objectives of the proposed amendments? If not, why not?</p> <p>Q6. Do you agree the benefits of the proposed amendments outweigh their costs?</p>	<p>Q4. No comment.</p> <p>Q5. Pan Pac agree with those commented on.</p> <p>Q6. Pan Pac has already provided the data.</p> <p>The application of a fall-back provision as proposed could impose much higher cost on a customer than summarised in the cost/benefit data given. The proposed fall-back provision is unreasonable (for reasons stated earlier).</p> <p>There is no explanation of data quality provided in consultation document and hence it is unknown what costs could apply if improved metering was required (noted that this may be the subject of future code amendments).</p>
<p>Q7. Do you agree there are no viable alternatives to the proposed amendments? If you disagree, please explain your preferred alternative option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010.</p>	<p>Q7. No comment.</p>
<p>Q8. Do you agree the Authority's proposed amendment complies with section 32(1) of the Act?</p>	<p>Q8. No comment.</p>
<p>Q9. Do you have any comments on the drafting of the proposed amendments?</p>	<p>Q9. No comment</p>

Kind Regards



Roger Jones

General Manager Pulp

