

5 November 2019

Submissions  
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## **UNISON SUBMISSION – CODE REVIEW PROGRAMME NUMBER 4**

### **Introduction**

Unison welcomes the opportunity to provide a submission to the Electricity Authority (the Authority) on the consultation paper, *Code Review Programme number 4 – September 2019*. In general, we support the changes that improve clarity and assist with proper market functioning for the areas that directly, or indirectly, involve distributors<sup>1</sup>.

Our response to the Code amendment proposal for the ‘revised timeframe for distributors to change price category code information in the registry’ is set out below.

### **2019-01 Revised timeframe for distributors to change price category code information in the registry**

Unison agrees with the problem definition for this Code amendment. The Code, as it is currently drafted, means that should a distributor agree with a proposed backdated change from a trader to the price category code, the distributor would breach clause 8(2)(b) of Schedule 11.1 by giving the registry manager notice of the change. This is because more than three business days would have passed since the change took effect.

This is an issue Unison has experienced first-hand, with non-compliance with this clause being identified in our distributor audits (due to late information from traders). Unison agrees with the Authority’s Code amendment as set out in the consultation paper which ensures that distributors are not unfairly penalised for varying timeframe obligations between distributors and traders.

Unison considers the following Code drafting will resolve the existing identified problems:

#### *8 Distributors to change ICP information provided to registry manager*

*(1) If information about an ICP provided to the registry manager in accordance with clause 7 changes, the distributor in whose network the ICP is located must give written notice to the registry manager of the change.*

*(2) The distributor must give the notice—*

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<sup>1</sup> Proposed amendments 2019-04/06/08/10/12/13.

- (a) *in the case of a change to the information referred to in clause 7(1)(b) (other than a change that is the result of the commissioning or decommissioning of an NSP), no later than 8 business days after the change takes effect; and*
- (aa) *in the case of a change to the information provided under clause 7(1)(g) that is intended to take effect from a date earlier than the date on which the distributor and the trader responsible for the ICP agree on the change, no later than 3 business days after the distributor and the trader responsible for the ICP agree the date on which the change takes effect; and*
- (ab) *in the case of decommissioning an ICP, by the later of— (i) 3 business days after the registry manager has advised the distributor under clause 11.29 that the ICP is ready to be decommissioned; and (i) 3 business days after the distributor has decommissioned the ICP:*
- (b) *in every other case, no later than 3 business days after the change takes effect.*

For any questions relating to this submission, please contact Amanda Watson, Senior Regulatory Affairs Advisor, by phone (06) 873 9372 or email [Amanda.Watson@unison.co.nz](mailto:Amanda.Watson@unison.co.nz).

Yours sincerely,



Nathan Strong  
**GENERAL MANAGER, BUSINESS ASSURANCE**

Attached: Code Amendment Form for Submission

## Appendix A Format for submissions

A.1 Please complete the table below for each proposed amendment on which you wish to submit. Please include the reference number from the first row of the table in Appendix B).

Reference	2019 - 01
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
Unison agrees with the problem definition for this Code amendment. The Code, as it is currently drafted, means that should a distributor agree with a proposed backdated change from a trader to the price category code, the distributor would breach clause 8(2)(b) of Schedule 11.1 by giving the registry manager notice of the change. This is because more than three business days would have passed since the change took effect.	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
Unison considers the Authority's proposed Code drafting will resolve the existing identified problems.	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
Yes.	
<b>Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?</b>	
Yes.	

**Question 5: Do you agree the benefits of the proposed amendment outweigh its costs?  
If not, why not?**

Yes.

**Question 6: Do you agree the proposed amendment is preferable to the other options?  
If not, please explain your preferred option in terms consistent with the  
Authority's statutory objective in section 15 of the Electricity Industry Act  
2010.**

Yes.