

5 November 2019

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Submission on the Code Review Programme 2019

Introduction

1. This is Vector Limited's (Vector) submission on the Electricity Authority's (the Authority) consultation paper, *Code Review Programme number 4 – September 2019*, dated 24 September 2019.
2. Vector generally agrees with the Authority's 'omnibus' Code amendments, which are "relatively small" or "technical and non-controversial" in nature. We believe the proposed amendments will promote greater efficiency and understanding of market processes to various extents, contributing to increased confidence and participation in electricity markets.
3. We set out below our comments on selected Code amendment proposals, following each proposal's reference number in the consultation paper.
4. No part of this submission is confidential. Vector's contact person for this submission is:

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Comments on selected Code amendment proposals

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

5. Vector strongly supports this proposed Code amendment, which will facilitate the accurate invoicing of traders and consumers.

2019-04: Improving the event of default provisions

6. We agree with this proposed Code amendment, which reflects Vector's current practice.

2019-06: Clarifying definition of Point of Connection

7. We agree with this proposed Code amendment, which matches Vector's current practice.

2019-08: Clarifying manner of providing final audit report and compliance plan

8. We agree with this proposed Code amendment. Vector currently uses the audit portal.

2019-10: Improving the process for converting secondary networks

9. We seek clarification whether this proposed amendment would apply to a data correction transfer, or whether such transaction would fall outside of the Code, i.e. an ICP has been incorrectly created against one distributor code when it has always actually been supplied by another distributor (created in error).
10. We further seek clarification whether backdating would be permitted (or not) in the above scenario, so that the correct information is recorded in the registry.
11. From a broader perspective, we note that terms such as “secondary network” and “embedded network” are defined in the Code. However, terms such as “network extension”, “customer network” and “types of secondary networks”, which are widely but loosely used in the electricity industry (as jargons), are not. These terms were used in the (defunct) Retail Advisory Group’s *Review of secondary networks* report to the Authority, dated 13 January 2017. We suggest that various network types be described or defined by the Authority when Code changes affecting (or potentially affecting) these types of network are proposed.

2019-12: Removing provision for supply shortage declarations to trigger payments under the Customer Compensation Scheme

12. In our view, this proposed Code amendment makes sense.

2019-13: Broadening the definitions of Generating Unit and Intermittent Generating Station

13. This proposed Code amendment makes sense. We note that the Authority is currently considering the removal of barriers to the participation of different forms of new generating technologies in the wholesale market.

Concluding comment

14. We are happy to discuss any aspects of this submission with the Authority.

Yours sincerely
For and on behalf of Vector Limited



Richard Sharp
Head of Pricing and Regulatory Compliance