

## 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 Revised time frame for distributors to change price category code information in the registry
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
Yes – Wellington Electricity agrees that the current clauses of the Code mean a distributor would be in breach of the Code on receipt of backdated changes in price category codes greater than 3 days.	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
Yes – Wellington Electricity agrees with the proposal to add a clause to the code which would allow a distributor to backdate a change to a pricing category. The proposed solution would appropriately address the problem identified.	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
No	
<b>Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?</b>	
<p>Yes – Wellington Electricity agree the change would:</p> <ul style="list-style-type: none"> <li>- Promotes the efficient operations of the electricity industry,</li> <li>- Improve the accuracy of the ICP information within the registry, which in turn will facilitate accurate invoicing of traders and consumers, and</li> <li>- Have little or no effect on competition and reliability</li> </ul>	

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

Yes – Wellington Electricity agrees the benefits in terms of the accuracy of information within the register and potential audit cost savings outweighs the small cost incurred by the registry manager.

**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.**

N/A – No other option were identified by the Authority.

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Reference	2019 – 03 Requirement to provide complete and accurate information under Part 8
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
<p>Yes – Wellington Electricity agrees that the current wording of clause 8.1A(1) implies the obligation to provide accurate, complete, not misleading or not deceptive information, is just to the extended reserve manager and not to all participants.</p>	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
<p>Yes – Wellington Electricity agrees with the proposal to expand the scope of the clause so that it applies to all information a participant provides to another person under Part 8. The proposed solution would appropriately address the problem identified.</p>	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
<p>No</p>	
<b>Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?</b>	
<p>Yes – Wellington Electricity agree the change would:</p> <ul style="list-style-type: none"> <li>- Promote the efficient and reliability by lower the risk of an adverse event on the power system, and</li> <li>- Have little or no effect on competition and reliability</li> </ul>	

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

Yes – Wellington Electricity the benefits in terms of lower likelihood of incorrect information provided under Part 8 outweighs the small cost incurred to make minor update to procedures.

**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 – Wellington Electricity agree that the reliance on the Fair Trading Act and the general law of negligence would not best achieve this objective and therefore no other option have been identified by the Authority.

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Reference	2019 – 04 Improving the event of default provisions
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
<p>Yes – Wellington Electricity agrees that there are improvements which could be made to the description of an event of default and the associated process in Schedule 11.5.</p>	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
<p>Yes – Wellington Electricity agrees with the proposed amendments to the Code to resolve the problems identified. These include to:</p> <ul style="list-style-type: none"> <li>- Remove the ability for an event of default to be triggered by a participant threatening to stop or suspend payment of its debts,</li> <li>- Requiring the MEP(s) of a defaulting trader to provide metering-related information to the Authority, if requested by the Authority,</li> <li>- Enable the Authority to not communicate with a defaulting trader's customers if there is good reason not to,</li> <li>- Enable the Authority to direct the registry manager to not process certain ICP switching activities if the Authority has given written notice to the defaulting trader,</li> <li>- Clearly state that the Authority can determine the recipient trader via the Authority's discretion, or a tender or other complete process, and</li> <li>- Clarify the obligation of the registry manager when directed by the Authority.</li> </ul>	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
<p>No</p>	

**Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?**

Yes – Wellington Electricity agree the change would:

- Lower the risk of an unnecessary default being triggered,
- Reduce instances of unnecessary errors in reconciliation, settlement and consumer invoicing,
- Reduce transaction costs associated with trader event of default, and
- Have no effect on the reliability of electricity supply

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

Yes – Wellington Electricity agrees the benefits in terms of:

- Decreased costs faced by the Authority and associated participant when validating the threat
- Increased accuracy in reconciliation, settlement and customer invoicing,
- Decreased costs to the Authority over communication requirements with the defaulting traders customers,
- Reduced market transaction costs associated with the need to initiate and/or complete ICP switches to a defaulting trader and then assign these ICPs to another, and
- Reduced time and effort spent by participants understanding the Code

outweigh the costs incurred in terms of:

- A slight increased risk of shortfall in energy payments to generators due to triggering an event of default later,
- An increased cost to the Authority in obtaining and providing meter read files,
- A negligible increased cost to the MEPs in obtaining and providing meter read files, and
- A negligible increased cost to the traders in obtaining meter read files.

**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.**

N/A – No other option were identified by the Authority.

## 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 – 06 Clarifying definition of Point of Connection
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
Yes – Wellington Electricity agrees that it is problematic that the current definition of “point of connection” can be interpreted by participants in a way not intended by the Authority.	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
Yes – Wellington Electricity agrees amending the definition of “point of connection” to explicitly state that a point of connection can have multiple phase or conductors, with a load in either direction, would address the problem identified.	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
No	
<b>Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?</b>	
<p>Yes – Wellington Electricity agree the change would:</p> <ul style="list-style-type: none"> <li>- Contribute to the efficient operations of the electricity industry,</li> <li>- Improve understandability of the Code, and</li> <li>- Have little or no effect on competition and reliability.</li> </ul>	

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

Yes – Wellington Electricity agrees the benefits in terms of reduced time and effort in understanding the Code, as well as, savings from compliance related costs outweigh the cost associated with this change.

**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.**

N/A – No other option were identified by the Authority



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Reference	2019 – 08 Clarifying manner of providing final audit report and compliance plan
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
Yes – Wellington Electricity agrees that the current clauses of the Code does not specify that a “final” audit report and compliance plan must be provided to the Authority in the manner prescribed (the audit portal) by the Authority.	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
Yes – Wellington Electricity agrees the amendment to the clauses clarified the audit report must be “final” and provided in the prescribed format.	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
No	
<b>Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?</b>	
<p>Yes – Wellington Electricity agree the change would:</p> <ul style="list-style-type: none"> <li>- Reduce the overall cost of administering an audit, and</li> <li>- Have no effect on competition and reliability</li> </ul>	

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

Yes – Wellington Electricity agree the benefits of reduced administration costs to the Authority and reduction in time and effort from clarification of the Code outweigh the costs, of which there are little to none.

**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.**

N/A – No other option were identified by the Authority.

## 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 – 10 Improving the process for converting secondary networks
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
<p>Yes – Wellington Electricity agrees with the three problems identified by the Retail Advisory Group relating to operational efficiency problems associated with the process by which a secondary network is converted to another type of secondary network.</p>	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
<p>Yes – Wellington Electricity agrees with the proposal to address the 3 problems identified. These include:</p> <ul style="list-style-type: none"> <li>- Adding a timeframe of 40 days (or an agreed alternative timeframe) for consent to be given for a conversion of an embedded network or a network extension to another type of secondary network,</li> <li>- Amending clause 25 of Schedule 11.1 of the Code to ensure that embedded network owners are not able to set a date which they are no longer responsible for the embedded network's NSP identifier until each ICP on the NSP is either "Decommissioned" or transferred during a change from an embedded network to a customer network, and</li> <li>- Amending clause 25(5) of Schedule 11.1 of the Code to ensure that NSP identifiers are not end dated until the embedded network owner has assigned all of the embedded network's ICP identifiers with an 'Active' or 'Inactive' status in the registry to the relevant parent network NSP identifier.</li> </ul>	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
<p>No</p>	

**Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?**

Yes – Wellington Electricity agree the change would:

- Remove inefficient costs from the process of converting an embedded network or network extension to a different type of secondary network.
- Improve the efficiency in the electricity industry by having more accurate information in the registry, and
- Have little or no effect on competition and reliability

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

Yes – Wellington Electricity agrees the benefits of avoiding a number of unnecessary costs associated with converting a secondary network to another type of secondary and ensuring ICP identifiers are recorded in the registry against the correct network outweighs the small cost incurred in relation to changes in processes and/or systems.

**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.**

N/A – No other option were identified by the Authority.