Better together.

22 September 2017

Submissions
Electricity Authority
Level 7, ASB Bank Tower
2 Hunter Street
P O Box 10041
WELLINGTON

By email: submissions@ea.govt.nz

TRUSTPOWER SUBMISSION: OPERATIONAL REVIEW OF EIEP FILES

Trustpower Limited (Trustpower) welcomes the opportunity to provide a submission to the Electricity Authority (EA) on its *Operational Review of Register Content Code* consultation paper.

Our answers to the specific questions posed in the Consultation Paper are attached in Appendix A.

For any questions relating to the material in this submission, please contact me, on 07 572 9888.

Regards,

22/09/2017

X ~~Chris Cooper~~

Signed by: Chris Cooper

Chris Cooper
TRUSTPOWER BUSINESS SOLUTIONS MANAGER

Register content codes - 2017 operational review consultation paper
Submitter (contact name, position, email address): Chris Cooper, Business Solutions Manager, chris.cooper@trustpower.co.nz

Question	Comment
Q1. Do you agree the issues identified by the Authority are worthy of attention? If not, please explain why.	Yes.
Q2. Do you agree that the proposed business requirements around period of availability and distributor's pricing information will support accurate application of register content codes and periods of availability for ICP based volume prices? If not, please explain.	Yes.
Q3. Do you agree with the Authority's preferred Option D which introduces generic register content codes for mass market TOU prices, and for consistency deletes existing customised codes that specify time blocks in the descriptions? If not, which option do you prefer and why?	No. OPTION A. Option D will introduce unnecessary complexity into Traders systems and surrounding processes such as switching and alignment with the registry, reconciliation, billing configurations and pricing updates. Every process system will need to be designed to incorporate every network scenario for the correct data outputs. The mapping of invalid to valid codes is not removed for traders, but replaced with a new mapping requirement for different time periods.

Question	Comment
	The register content codes are a single source of both the type of information being recorded by the channel and the time blocks the channel is active for (and must specify the periods of availability). It will be less likely for errors to occur by retaining the current one to one relationship, than if the information had to be sourced from the distributor's pricing information by traders and MEPs and applied to a generic value.
Q4. If the Authority implements Option D, we propose to allow participants 6 months to convert from using the customised register content codes to the corresponding generic register content codes (mapping demonstrated in Appendix C). Would this be sufficient time? If not, please advise how much time would be reasonable.	No. 10 Months as multiple systems are affected.
Q5. Do you agree that the Authority should progress a Code change to mandate that a distributor's pricing information must contain certain information to assist consistent and correct application of register content codes and periods of availability for ICP based volume prices? If not, please explain why.	Yes
Q6. Do you agree with the objectives of the proposed amendments? If not, why not?	No. We disagree with the generic register content codes.
Q7. Do you agree the benefits of the proposed amendments outweigh the costs? If not, please explain your reasons.	N/A

Question	Comment
Q8. Do you agree the proposed amendments are preferable to other options? If you disagree, please give reasons.	No. See response to Q3.