## great value energy

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29 September 2017

Submissions Electricity Authority PO Box 10041 Wellington 6143

By email: submissions@ea.govt.nz

Nova Energy Limited PO Box 10141, Wellington 6143 www.novaenergy.co.nz

## Re: Consultation Paper - Register content codes - 2017 operational review

Thank you for the opportunity to provide feedback on your Registry content code operational review.

Nova Energy supports the Authority's review in this area and the proposed option recommended as well. Our preference is always to remove complexity and to introduce standardisation where it is practical and/or possible.

Please feel free to contact me if you wish to discuss our views further.

Yours sincerely

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## Nova submission

## <u>Appendix</u>

Responses to the discussion paper

Q No.	Question	Response
Q1.	Do you agree the issues identified by the Authority are worthy of attention?  If not, please explain why.	Yes. Nova Energy supports this review and the changes recommended.
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?	Yes.
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.	Yes. We further recommend/ request the EA provides clear instructions to all participants on the final changes.
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?	Yes

Q No.	Question	Response
	If not, why not?	
Q7.	Do you agree the benefits of the proposed amendments outweigh the costs?  If not, please explain your reasons.	Yes
Q8.	Do you agree the proposed amendments are preferable to other options? If you disagree, please give reasons.	Yes