Register content codes - 2017 operational review consultation paper

To: Electricity Authority

Submission from Clive Gifford, private individual, Owhango

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This submission will be very short.

More than a year ago I lodged a formal complaint (with the EA) against Finincial Corporation Ltd (FCL), a 100% owned subsidiary of The Lines Company Ltd (TLC). I am a customer on TLC's network and FCL is the primary MEP for installations on that network.

My complaint included several elements around gross inaccuracies in the registry, spread across thousands of installations.

One item I raised was that the register content code used for the new EDMI meters now found in the vast majority of installations on TLC's network used "UN" (all consumption uncontrolled) as the register content code for the register showing total consumption (24 hour). This was done regardless of whether the installation had controllable load (typically hot water heating via an internal ripple control relay) or not. There was only one exception out of close to 20,000 installations where FCL were the MEP that did not have the "UN" content code. This meant many thousands of installations were incorrectly coded.

A year later, and the situation has not changed. The EA's response to me in late 2016 amounted to nothing less than fobbing me off as far as I could ascertain. And even in that they made factually incorrect statements.

The situation today is that FCL has failed to correct the situation, and I can only conclude that the EA has actively allowed this to happen.

Furthermore, FCL have more recently introduced new inaccuracies into the registry data, this time allowing thousands of non-existent meters to be present in the registry records as if they were active. I have watched, bemused, as this happens and the EA apparently are again completely oblivious, not to mention FCL, TLC and others using that registry data.

I suppose I will lodge another formal complaint and let the EA fob me off again.

To conclude this brief submission, when the EA, a so called regulatory body also allows the registry to be full of inaccuracies of this kind and also a full year after explicit complaints have been made with details provided, then I have to wonder if they can be taken seriously. Garbage in, garbage out is a well known phrase that seems highly applicable. Consulting about ever more complex coding schemes is pure farce in the face of the same organisation allowing gross inaccuracies to persist on a massive scale.