

Code review programme #5

User: **Brett Woods**

Submitted: **11/10/2023 11:20:12 AM**

Reference: **69d3ead1-5e51-4e07-ae66-b096002bf379**

Summary of information submitted

Who are you submitting as...

Industry participant

Which industry participant

Contact Energy

Code amendment proposal items

Would you like to submit on any items

Yes

Please select which item you'd like to submit on

Item 15 - Limiting the ability to remove and ICP from the shared unmetered load (SUML) list

Q1. Do you agree the issue(s) identified by the Authority need attention? Please answer Yes/NO and comment if applicable.

Yes

Q2. Do you agree with the objectives of the proposed amendment? Please answer Yes/No and comment if applicable.

Yes

Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Please answer Yes/No and comment if applicable.

Yes

Q4. Do you agree the proposed amendment is preferable to any other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010? Please answer Yes/No and comment if applicable.

Yes, we support this change as it means all customers benefiting from the unmetered load are accurately recorded against the shared unmetered load ICP in the Registry, therefore, are equally sharing the costs, responsibilities, etc incurred.

Q5. Do you have any comments on the drafting of the proposed amendment? Please answer Yes/No and comment if applicable.

No

Q6. Do you have any further comments on the proposal? Please answer Yes/No and comment if applicable.

No

Q7. Is any part of your submission confidential? Please answer Yes/No and comment if applicable. If yes, please explain which part, why it is confidential and provide a publishable replacement (refer paragraphs 1.9 to 1.11 of the consultation paper)

No

Item 16 - Timeframes to update the registry when dependent on metering equipment provider (MEP) updates

Q1. Do you agree the issue(s) identified by the Authority need attention? Please answer Yes/NO and comment if applicable.

Yes

Q2. Do you agree with the objectives of the proposed amendment? Please answer Yes/No and comment if applicable.

Yes

Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Please answer Yes/No and comment if applicable.

Yes

Q4. Do you agree the proposed amendment is preferable to any other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010? Please answer Yes/No and comment if applicable.

Yes, we support this change as it removes the ability for the Network and Retailer to be forced into a non-compliant situation as a result of an MEP utilising their full compliance time frames to update the Registry when a change to an ICP occurs.

Q5. Do you have any comments on the drafting of the proposed amendment? Please answer Yes/No and comment if applicable.

No

Q6. Do you have any further comments on the proposal? Please answer Yes/No and comment if applicable.

No

Q7. Is any part of your submission confidential? Please answer Yes/No and comment if applicable. If yes, please explain which part, why it is confidential and provide a publishable replacement (refer paragraphs 1.9 to 1.11 of the consultation paper)

No

Item 21 - Clarifications to hedge settlement agreements

Q1. Do you agree the issue(s) identified by the Authority need attention? Please answer Yes/NO and comment if applicable.

Yes

Q2. Do you agree with the objectives of the proposed amendment? Please answer Yes/No and comment if applicable.

Yes

Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Please answer Yes/No and comment if applicable.

Yes

Q4. Do you agree the proposed amendment is preferable to any other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010? Please answer Yes/No and comment if applicable.

Yes.

However, Contact considers that the clearing manager's obligation to advise the parties of the calculated amounts should be on the 1st business day (rather than the 5th business day) as prices will already be finalised.

Q5. Do you have any comments on the drafting of the proposed amendment? Please answer Yes/No and comment if applicable.

No

Q6. Do you have any further comments on the proposal? Please answer Yes/No and comment if applicable.

Yes.

Schedule 14.4 Forms 1, 2 and 3 are ordinarily used in isolation from the Code (and its definitions). It is important that users of Schedule 14.4 Form 1 have a clear understanding of what constitutes a non-business day, in particular the blanket inclusion of the day observed for Wellington Anniversary Day.

Contact suggests expressly including the Code definition of business day and national holiday in paragraph 2 of Form 1 alongside the other definitions to ensure the terms are understood for the purposes of individual trades when Form 1 is used in isolation from the remainder of the Code.

Q7. Is any part of your submission confidential? Please answer Yes/No and comment if applicable. If yes, please explain which part, why it is confidential and provide a publishable replacement (refer paragraphs 1.9 to 1.11 of the consultation paper)

No

Technical and non-controversial amendment items

Would you like to comment on any technical and non-controversial items?

No

Cover note

Would you like to add anything further to support your submission?

Please attach any covering comments to support your submission (optional)
