

Code review programme #5

User: Simon Hart

Submitted: 9/10/2023 9:06:24 AM

Reference: 97bad23f-8a81-4f7e-8422-b092015599f8

Summary of information submitted

Who are you submitting as...

Industry participant

Which industry participant

PRC0139

Code amendment proposal items

Would you like to submit on any items

Yes

Please select which item you'd like to submit on

Item 9 - Prohibiting ICPs being connected in series

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

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.

Powerco supports the change as proposed as there is no practical purpose to connect ICPs in series outside of the exceptions included in the amendment.

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 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

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.

Powerco agrees with the proposed amendment and the reasoning provided. In addition, we believe guidelines or direction from the Authority on when connections "receive benefit" from shared unmetered load would add some valuable clarity.

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.

While the proposed amendment would address the timeframes to update registry for distributors, we believe that the Authority should consider changing the underlying cause of the issue, specifically relating to distributors decommissioning ICPs. That is, the registry prevents distributors from entering the correct effective date of decommissioning if the MEP physically removes the metering installation after the connection has been completely decommissioned from the network. We understand the logic for the decommissioning status to be the 'final' event on the ICP, but this often does not reflect the timeline of physical works and results in incorrect information in registry.

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 20 - Revised timeframe for updating the 'chargeable capacity' in the registry

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

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

Powerco supports the change as we consider the additional fields part of the same price category information. We would also support expanding clause 8 of Schedule 11.1 to apply to the loss category code field, which would align it as part of the 'Pricing' category in registry. Changes to loss category code are less frequent, but we do not see any cost, or risk in including them in the amendment.

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

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)
