

26 September 2023

Submissions
Electricity Authority
PO Box 10041
Wellington 6143

(By Email to: distribution.feedback@ea.govt.nz)

Dear Electricity Authority,

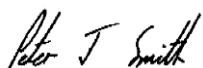
Proposed Minor Changes to the Registry (Market Brief 5 September 2023)

Thank you for the opportunity to submit on the above proposed minor changes to the Registry data fields relating to Distributed Generation and the ICP Address Event.

In summary, Northpower supports the proposed change and additions to the Distributed Generation Fuel Type static data table in the Registry. However, we do not support the proposal to delete the Address Event Property Name field from the Registry.

Our detailed response relating to the proposed changes as outlined in the Consultation information published on the Electricity Authority web site is attached as an Appendix to this letter. All parts of this submission are available for publishing as part of your consultation decisions document.

Yours sincerely,



Peter Smith
Compliance Manager

Appendix: Northpower Submission

Proposed Changes to the Distributed Generation Fuel Types Static Data Table

1. Northpower agrees that the addition of the three proposed “fuel type” codes to those already available in the Fuel Types Static Data table will add value to the distributed generation data held in the Registry.

We note that there have been many distributed generation installations which have included battery storage livened on our network in the past two or three years. In view of this trend, has any thought been given to providing a dispensation from the Code for networks to backdate the fuel type data for these ICPs where this data could be easily located? Such a dispensation from the “3 business day” Registry update requirement would encourage networks to correct the Registry data to reflect the actual situation at each affected ICP.

There is also a related distributed generation field in the Registry Network Event for the Generation nameplate capacity in kW. Has any thought been given to including an additional field for the battery storage capacity? We do understand that such a change would impact many participants due to the software changes required but a cost-benefit analysis may show if the value of this additional data outweighs the costs. This additional field could be included with any other planned Registry changes being considered, for the implementation of multiple trading relationships as an example.

2. Northpower supports the proposed change to the existing “Electric Vehicle” option in the Fuel Types Static Data table. Our only concern is that, without a review of Part 6 of the Code, there is the possibility as this technology becomes more common that a network will not be made aware of the installation of the this equipment if a metering change is not required.

Enhancement to the Address Event Property Name Field

Northpower supports the addition of a “tool tip” attached to the Address Event Property Name field. The Property Name field is invaluable for holding data to help locate (describe) an ICP especially in rural locations or city multi tenanted building situations.

We would recommend that the “tool tip” gives reference to the Address Population Standards (Appendix 2 of the Registry Functional Specification document). This document has good guidance on how the Registry Address Event fields should be completed including the Property Name field.

Northpower does not support the deletion of the Property Name field from the Registry. We believe this field, if used correctly, has immense value in allowing the ICP physical location address data to more fully describe the ICP and its location. If there are issues with Distributor Registry participants populating the Address Event Property Name field with inappropriate data, consideration should be given to including a check on this data in future Distributor Audits.