

18 September 2023

Distribution Feedback
Electricity Authority
PO Box 10041
Wellington 6143

distribution.feedback@ea.govt.nz

Dear Electricity Authority,

Consultation – Minor Improvements to the Electricity Registry

Wellington Electricity Lines Limited appreciates the opportunity to provide a submission in response to the above Electricity Authority consultation.



Wellington Electricity
Lines Limited

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Proposed Change	Feedback
<p>1. The Authority proposes to add three new entries to the 'fuel type' codes in the Description Table of SD-020 in the registry functional specification on page 418 these being:</p> <ul style="list-style-type: none">• 'solar + battery' – solar PV generation and a battery• 'wind + battery' – wind turbine and a battery• 'standalone batt' – battery only, excludes EV batteries in a vehicle to grid configuration	<p>Wellington Electricity agrees with the proposed change</p>
<p>2. Secondly, as vehicle to grid installations (where an electric vehicle can supply power from its battery back to the network) are increasing in New Zealand, the Authority proposes an additional change to the fuel type codes:</p> <ul style="list-style-type: none">• Change the 'electric vehicl' entry to 'elec vehicl V2G' with the following description 'electric vehicle (includes fuel cells) exporting through a vehicle-to-grid configuration'.	<p>Wellington Electricity agrees with the proposed change</p>
<p>3. The Authority would like to add a tool tip to the 'Property Name' entry in the registry, to ensure that this field is only completed when necessary and with the correct information:</p> <ul style="list-style-type: none">• Add a tool tip to the 'Property Name' entry in the registry that says <i>This entry should be left blank unless it is absolutely necessary to include information to help</i>	<p>Wellington Electricity is neutral on the addition of a tool tip to the 'Property Name' field. We use direct integration from our Gentrack system to add and maintain ICP information in the registry, this tool tip would not be visible to us when we create ICP's.</p>

Proposed Change	Feedback
<p><i>identify the location of the ICP. In no instances should address information be added here.</i></p>	
<p>Alternatively, the Authority could delete the 'Property Name' entry altogether and we seek your views on this option.</p>	<p>Wellington Electricity would object to deleting the 'Property Name' entry altogether for the following reasons:</p> <ul style="list-style-type: none"> • Removal of the Property Name entry would immediately lead to a large number of ICP's with duplicate addresses – approx. 11,000 ICP's on the CKHK network. This would require significant resource and system changes to review each ICP and try to remedy (if possible, based on the below points). • The Unit & Street Name entries alone would not be sufficient to fully identify some ICP's i.e. commercial buildings with multiple businesses per unit/level - these often have the same street address without defined unit numbering. In these cases, the Property Name entry provides additional identifying information to distinguish each ICP. • Some fixtures may not have a defined street number – In these cases, the Property Name entry provides additional identifying information to distinguish each ICP. • Greenfield developments often require ICP creation prior to street names being allocated by territorial authorities. In these cases, the name of the development/estate along with Lot/DP information would need to be populated in the Property Name field until a street address was available. • We believe that the removal of additional identifying information for ICP's currently available in the Property Name field would lead to confusion for people searching the registry for their ICP. This could lead to the incorrect ICP being switched between Traders.

We would be happy to discuss our submission in more detail if required. If you wish to do so, please contact Sharlene Meyer, Connections Team Leader, at [REDACTED]

Yours sincerely,



Sharlene Meyer
Connections Team Leader