29 July 2025

Electricity Authority
Level 7, AON Centre,
1 Willis Street,
Wellington 6011

Dear Policy team,

Intellihub Submission on the Evolving Multiple Retailing and Switching Consultation

Introduction

Intellihub Group ("**Intellihub**") welcomes the opportunity to provide its views on the *Evolving Multiple Retailing and Switching Consultation* ("**Consultation Paper**").

Intellihub acknowledge that this is following on from previous consultation papers and the Switch Review paper in 2019 that were looking at the low levels of switching as a factor that may reduce competition and downward pressure on prices for consumers. Intellihub believe that providing consumers with better information on their electricity usage, and access to tariff options that reward them for adjusting their demand behaviour, will be equally important to promoting innovation and downward pressure on prices.

Intellihub have carefully considered the options raised in the Consultation Paper to improve the current switching processes and introduce the Multiple Trading Relationships changes. Our detailed responses to these individual options are **attached.** We make some key points below which underpin our responses.

Generally, Intellihub support the proposals in the Consultation Paper, except where we consider that they add cost or complexity without a significant countervailing benefit to consumers or market participants. Intellihub acknowledge that these proposals are formulated at a high level, and that the Authority is still to decide on the final form of these proposals.

Impact of Switch changes

As an independent Metering Equipment Provider ("**MEP**"), Intellihub is committed to providing innovative metering technology that will provide benefits to consumers. Intellihub therefore agrees that reviewing the current ICP switching processes, the issues from the previous papers and the submissions received is important to ensure they do not impede competition and innovation – particularly in light of the increasing use of new technology (including AMI) in the industry. Intellihub support the objective of making improvements to the switching process to address current operational inefficiencies and to improve outcomes for consumers.

However, the Electricity Authority ("**Authority**") should ensure that seeking to promote more efficient switching of consumers between traders does not come at the expense of imposing additional burden and costs on parties that do not need to be involved in the switch process.

Although the Code places some obligations on MEPs, the key relationship between MEPs and traders is governed by commercial arrangements. These arrangements are subject to competition, which is a key way that the market promotes innovative and high-quality metering services for the benefit of consumers. The market has developed commercial arrangements to

help ensure that when a consumer is switched between traders, the gaining trader can keep the existing MEP or efficiently appoint a new one.

MEPs have no control over the switching process, which is a matter between a switching consumer and the losing and gaining trader. A MEP is involved in this process only due to its contractual relationship with the losing trader, and potentially the gaining trader.

In our view, it would be inappropriate to subject MEPs to obligations under the Code in respect of a process that is outside of their control, and in an effort solve problems that they do not cause. Adding MEPs as participants to the switching process is likely to introduce complexity at additional cost to the industry, without providing a significant countervailing benefit.

Intellihub, agrees with most of the Authority's proposed solutions for the switching process. However, there are some key areas where we feel adjustments are needed, as set out in our submission. In addition, a detailed review of the Code is required to resolve inconsistencies between Parts 10, 11 & 15 of the Code. These inconsistencies should be resolved prior to implementation of the proposals set out in the consultation.

Impact of MTR changes

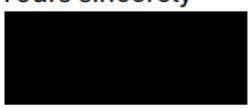
Intellihub agrees that the Authority's preferred approach to MTR would enable consumers to purchase their energy from one retailer while selling their generation to another. This will provide consumers with a new choice that was not available to them in the past. However, the proportion of consumers that stand to benefit from MTR is small, and there may be limited scope for competition or pricing to be improved by MTR. In addition, the recent introduction of time varying pricing for buyback rates may further reduce the scope of potential benefits to consumers. The costs for implementation of MTR across the industry are likely to be significant. This is likely to put upward pressure on the price that all consumers pay for energy. Given this imbalance in cost benefit it is unlikely that the majority of consumers would benefit from the introduction MTR.

Implementation

Related to the above points, the Consultation Paper suggests that the Authority could progress two work streams at different speeds, with "switching changes" coming first. Intellihub agrees that this approach will produce the best outcome. However, we believe that the Authority first needs to confirm the final form of any changes, including any Code changes, so that participants can plan an efficient work programme across all changes. There is also a need for further engagement with participants to provide clarity over any confirmed changes, and to share an implementation plan for each area of change. Thereafter, Intellihub would prefer to see the implementation timeline for these changes set at 15 & 24 months.

Please do not hesitate to contact me if Intellihub can provide further assistance.

Yours sincerely



Corrie Stobie
Regulatory Affairs Manager

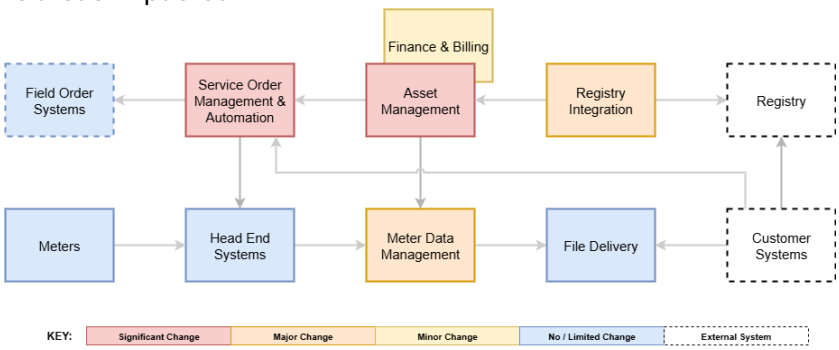
Appendix B Format for submissions

Submitter	Intellihub

Submissions close 5pm Tuesday 29 July 2025

Questions	**Comments**
Questions on the Authority's vision	
Q1. (Paragraph 2.20) Do you agree with the Authority's vision for consumer mobility? If not, what would you change and why?	Please note, this differs from the question written in the consultation document. Intellihub agrees that the current switching processes can be improved, and that doing so will make it easier for consumers to switch providers. We believe some of the changes proposed by the Authority will lead to more efficient consumer switching and management of related Registry data. However, there are some areas where we feel the proposals should be revised, as set out in the switching section of this submission. Intellihub supports the Authority's vision for enabling a competitive retail services market where consumers can select the provider(s) and product offerings that are most compelling to them. We also support the Authority's preferred design for the implementation of Multiple Trading Relationships (MTR). However, we are uncertain how effective MTR will be in improving competition or consumer mobility and outlined in our response to question 4.
Q2. (2.20) Do you have any comments regarding future stages of multiple trading, whether the proposal provides optionality for the potential future stages, and the options the Authority should consider?	The potential of MTR and to what granularity this may go is still in its early development (including Internationally) noting that there have been some early trials with more trials being proposed. These trials are needed to understand the nuances around consumer benefits and the costs to implement borne by all parties including consumers who may not be able to take advantage of these solutions. This all needs to be considered when assessing future stages.
Questions on Multiple trading	
Q3. (3.26) Do you agree with the proposed solutions? If not, what would you change and why?	Intellihub supports the Authority's proposed approach to the technical implementation of MTR. We also support keeping the initial scope of MTR narrow. This will enable the industry to learn how best to operate in a MTR environment before subsequent stages focus on larger consumer segments. However, we are concerned that the potential upside for residential consumers is quite limited, as set out

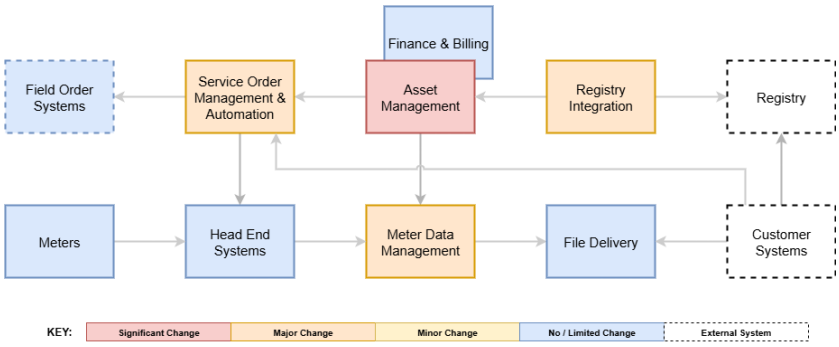
	in our response to question 4. An alternative would be to focus stage 1 on the customers that are receiving a commercial and industrial services from their retailer, where the amount of generation or demand response is likely to be more material. Intellihub considers it imperative that the Authority ensure the implementation of MTR does not introduce a new dependency for MEPs when managing events. This dependency would arise if the MTR implementation utilised the same event date field that is used by the MEP for other event updates. One approach to this would be for the Registry to specify and store the assignment of traders to consumption and generation at the trader level rather that within the metering information. As MEPs undertake more metering changes than are driven through switches or new installations, this would allow the Registry to specify the relationships, without blocking other event updates, and would leave the MEP to apply those to the channels to the metering within its data delivery systems whenever a meter change takes place.
Q4. (3.26) Do you agree with the benefits anticipated from the proposed solutions? Are there other benefits you can anticipate or improvements to operational effectiveness and efficiency? Can you quantify these benefits?	Intellihub agrees that the Authority's preferred approach to MTR would enable consumers to purchase their energy from one retailer while selling their generation to another. This will provide consumers with a new choice that was not available to them in the past. We also agree that the preferred approach is the best option presented, and that it provides a foundation that could be built upon for more mature stages of MTR implementation. However, as MTR would only be available to consumers with solar or battery solutions in place at stage 1, the benefits would only be available to less than 5% of consumers. If the uptake rate from this group is 20% then less than 1% of consumers would potentially experience improved outcomes. Further, the recently announced requirement for retailers and distributors to provide time driven pricing plans to reward consumer who provide energy at peak times is positive for consumers. But any price upside delivered by this change may mean that the there is less potential price upside for consumers arising through MTR. In addition, the proposal does not seem to consider that the rate a consumer pays for consumption under their current price plan may increase if any cross subsidy created by their excess generation is no longer available once this transitioned to an alternative retailer. Given this it may remain beneficial for a consumer to remain with a single retailer. As an alternative to MTR, it might be useful for the Authority to consider how else they can motivate retailers to offer innovative products that provide consumers with embedded generation a broader range of services to align with their needs. The consultation also notes that there is currently little demand for multiple consumption retailers on a single ICP. This naturally limits

	the scope for improved consumer mobility that will arise because of the MTR implementation. While the scope of MTR benefits appears to be limited, the capability must be available to all consumers. As such the costs arising through MTR will add to upward pressure on energy prices for all consumers, while only a small portion of all consumers may realise benefits. It therefore does not follow that MTR will deliver improved competition, or energy pricing, for most energy consumers. Intellihub acknowledges that the Authority may have access to additional information or modelling that underpins the cost benefit proposition for MTR. We would welcome further engagement regarding the anticipated scope of benefits arising from MTR.
Q5. (3.26) Do you anticipate the proposed solutions will introduce cost into your organisation, and if so, can you quantify this cost and/or provide a high-level description of the changes that need to be made?	Yes, we anticipate that changes are required to processes and systems to support MTR. The diagram below provides a very high-level conceptual overview of our architecture with a heat map as to the areas impacted:  The key areas of changes will include: • Asset Management including relationship management; • Service Order Management including customer management; • Registry integration and all related reconciliation and reporting functions; • Meter Data Management; • Billing; and • Reporting. We estimate that that these changes will cost approximately $1.76m for us to make in our current solutions. There are some synergies with the trader and MEP switching consultation in that they both touch upon similar functional areas within our solutions. Being able to combine them into one programme of change activity within Intellihub would enable us to reduce the costs of delivering both outcomes. We also anticipate a modest uplift in on-going operating costs provided we can fully automate all outcomes and keep exception management to a minimum.

Q6. (3.47) Do you agree options 2 and 3 are not preferred? If not, why not and how would you overcome the disadvantages?	Yes, we agree that options 2 and 3 are not preferred.
Q7. (3.47) Do you agree that option 1 is the preferred option over options 2 and 3 and the reasons for preferring option 1? If not, why not?	Yes, we agree that option 1 is the preferred approach.
Questions on trader switching	
Q8. (4.55(q)) Should the provision of the average daily consumption remain mandatory, or should it be optional? If optional, please explain why?	Intellihub is an MEP and so this change is outside our scope.
Q9. (4.55(q)) Do you agree with the proposal to align timeframes to a maximum of two business days for NT and AN notification, and to reduce timeframes for the CS file?	Intellihub is an MEP and so this change is outside our scope.
Q10. (4.55(q)) Do you agree with the proposed solutions? If not, what would you change and why?	We agree with most of the Authority's proposed solutions for the switching process. However, there are some key areas where we feel adjustments are needed for the proposals to be workable and for the MEP to be able to meet their compliance obligations. These are set out below: • 4.43(f) - We understand the reasoning behind the idea that the retailer should be able to initiate changes to the configuration of a site when switching in a customer if these changes are required to underpin their product offering. However, Intellihub's view is that enabling a retailer to modify a site before they are the trader of record, and adding a dependency between the switch process and the meter change process, would introduce risk and complexity that outweighs the potential benefits. It will also introduce significant system change costs for MEP to enable

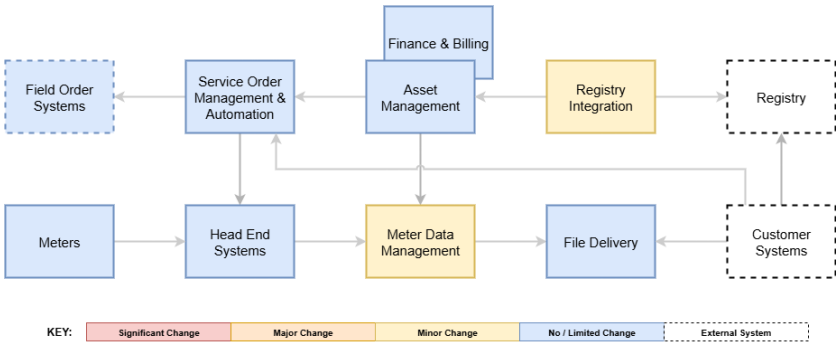
	systems to mediate which party is entitled to initiate fieldwork at a given ICP. At present an MEP can clearly identify which retailer is entitled to initiate fieldwork at an ICP and there is a clear alignment between the ability to request change and to receive services (data) on a site. This one-to-one relationship is a foundational design assumption in many of our information systems. If a retailer can also initiate fieldwork based on a pending switch, MEP systems would have to be updated to accommodate this more complex scenario effectively splitting the role of retailer to reflect the separation of rights during a retailer switch. There is also the potential that fieldwork may occur, or be planned, and the switch is subsequently withdrawn. This could leave a losing retailer in a position where they inherit an altered configuration that doesn't fit their products. Effectively this would broaden the impact of complexity around meters changes from the gaining retailer to impact both retailers and the MEP. In our view it's important to retain the principal that a retailer must have successfully gained a site before they can initiate fieldwork. We expect this change would drive increased complexity with respect to responsibility for a given ICP through the switching process. For instance, where services are provided in respect of an ICP and the switch is cancelled, does the losing retailer need to accept a modified configuration or would the gaining retailer need to carry out a make good on the site? There are also complexities arising with respect to safety. If a site is modified by a gaining retailer and then an issue arises at the site before the switch completes is the primary PCBU the gaining or losing retailer? It is also impractical to introduce a dependency between the switching process and the completion of a physical change at site. In many cases fieldwork is planned for a window of time rather than a specific date, and so no exact date is known. There are also many infield factors, such as site conditions or weather that can result in fieldwork being rescheduled, or it may be done last minute at the request of the consumer when talking with the field service provider. Adding this complexity will lead to significant delays and complexity during the switching process. Intellihub's view is that we should retain the principle that a retailer has to successfully acquire a customer before they are entitled to make changes to the configuration of the site. In addition, configuration changes should occur independent of the

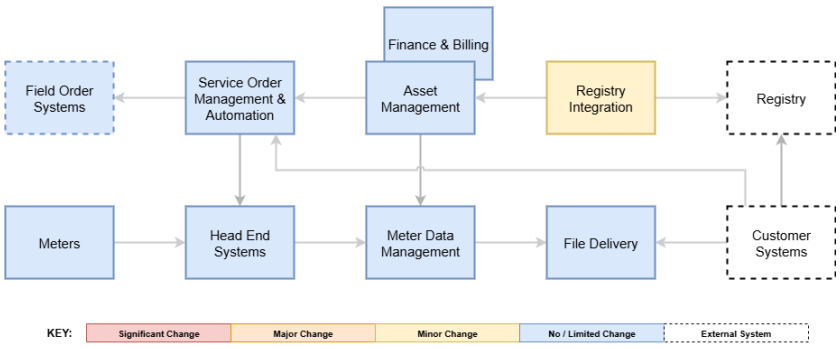
	switching process to avoid infield factors driving complexity into the switching process. In practice we believe that retailers are generally equipped to handle the existing configuration at site, and that it is feasible for them to do accommodate this for a brief period post switch while they initiate implementation of their ideal configuration. • 4.43(g) – Intellihub is happy to provide switch day readings to both the losing and gaining trader. The most efficient way for us to achieve this is by adjusting our standard read services so that readings for the switch day are included in the daily read files that are sent to relevant retailers each day. Note that these files also include a "No Read" code estimated read (if the customer has opted to receive estimates) which indicates where an actual read is not available. On this basis the retailer will be able to evaluate readings available from the MEP and include these in the switch response files, or they can estimate in cases where actual readings are not available. This approach avoids the cost of the MEP building integrations into the switching process itself. • 4.43(j) – Intellihub already provides register reads at a precision of up to 4 places in our daily read files. Our suggestion is that the Authority ask the retailer to maintain the existing read precision in their switching files. All retailers receive this level of precision from us in their daily read files and so accommodating this for switching and billing should not require any material changes to systems. • 4.43(k) – We note that readings are available for most meters each day up to the prior midnight, but it's reasonably common for additional readings to arrive within 1-2 days. On this basis we suggest the Authority consider if it would be more efficient to have these reads flow as a revised switch read or if the retailer should be entitled to hold for 1-2 days before providing the switch read. If the retailer is compelled to provide the switch read on the switch event day, then this will result in a higher proportion of switch reads being estimated than would occur if the retailer could wait 1-2 days for any additional actual reads to be processed.
Q11. (4.55(q)) Do you agree with the benefits anticipated from the proposed solutions? Are there other benefits you	Intellihub agrees with the benefits set out by the Authority, except in respect of proposals 4.43(f) and 4.43(g). We believe the proposals would put significant cost on the industry, and that these costs are not in proportion of the potential benefits arising. Our strong

can anticipate or improvements to operational effectiveness and efficiency? Can you quantify these benefits?	suggestion is that the Authority revise these proposals to align with the feedback provided in question 10.
Q12. (4.55(q)) Do you anticipate the proposed solutions will introduce cost into your organisation, and if so, can you quantify this cost and/or provide a high - level description of the changes that need to be made?	Yes, we anticipate that changes are required to process and systems to support changes to trader switching. Most of this work is to support treating the incoming trader as a trader of record equivalent to the losing trading with regards to being able to issue requests for change – this has traditionally always been a single party role. The diagram below provides a very high-level conceptual overview of our architecture with a heat map as to the areas impacted:  The key areas of changes will include: • Asset Management including relationship management; • Service Order Management including customer management; • Registry integration and all related reconciliation and reporting functions; • Meter Data Management; and • Reporting. We estimate that that these changes will cost approximately $875K for us to make in our current solutions. There are some synergies with MTR and MEP switching consultation in that they both touch upon similar functional areas within our solutions. Being able to combine them into one programme of change activity within Intellihub would enable us to reduce the costs of delivering both outcomes. We also anticipate a modest uplift in on-going operating costs provided we can fully automate all outcomes and keep exception management to a minimum. The complexity involved in unwinding uncompleted switches may present a challenge to this.
Questions on MEP switching	

Q13. (5.34) Are there any other files that should be added to this list?	Intellihub does not wish to add any additional files to the proposed solution.
Q14. (5.38) Do you agree with the proposed solutions? If not, what would you change and why?	There are a significant number of changes, some which are small and some large, that will impact systems, processes, compliance, and audit requirements if they are implemented. Intellihub agrees with the proposed solutions except for the areas where feedback is provided below: • Clause 5.28(a) – Allowing the gaining and losing MEP to make event updates on the same day is a welcome change for MEPs. If the Authority decides to proceed with this change, the proposed solution should be extended to clarify how the timestamp is to be derived, and what business rules would apply for the sequence or prioritisation of physical and non-physical events in cases where there is contention for the same timestamp. • Clause 5.28(b) – Intellihub is open to the addition of a communication state field in the Registry. However, we believe the proposal needs to be revised to address a few key areas. We do not agree that C&I should be added as a new Metering Type. The existing metering types of HHR and NHH are aligned with the certification of the installation, and with how the resulting data is used in the settlement processes. The existence of 7306 channels on the Registry indicates where this data is available. Ultimately the decision as to which meters are considered C&I can be derived using existing Registry fields, with augmentation from the retailer systems in cases where C&I retailer services are provided for lower category metering. Given this designation is not something that the MEP can control, and that it does not align with the certification of the installation, it is not appropriate to add this information to the Registry as a new Metering Type that is maintained by the MEP. In respect of the proposed Communication Status field, Intellihub believes the proposal should be revised. Where a meter is out of communication for 25% of its MIC or 30 days the MEP is already required to change the AMI Flag to N. On this basis setting a Communication Status to reflect that “local” reading is required, or that communication is “unavailable” is not creating new information. Further, most meters are either communicating regularly or are offline. The set of meters that sit in between these two states as intermittent communicators is very small, and in most cases a communication difficulty will exist for a short period before the meter moves into a state where

	it is regularly communicating or offline. As a result, a retailer using the proposed Communication Status field would become frustrated quickly by the changeable nature of the flags, and limited insight provided beyond the existing AMI Flag field. On this basis it does not seem likely the proposed Communication Status field will create any material benefit for retailers than is available using the existing AMI Flag field. If the Authority decides to proceed with a Communication Status field, our suggestion is that the existing AMI Flag should be reverted to its original use which was to indicate that a device as the capability for communications (and schedule 10.6 of the Code should be adjusted to reflect this as set out in question 28). The Communications Status field can then be used to describe the more granular status of communication. This field should be separated from other events that describe meter information on the Registry, given the frequency of updates that may occur, to avoid contention with metering event updates. We suggest the setting of such a field should focus on the following measures (based on a rolling 60-day window): regular (90% or higher probability of daily communication), intermittent (below 90% probability of daily communication but not classified as non-communicating), and non-communicating (offline for 25% of MIC or 30 days). We suggest setting a weekly frequency of updates to limit the burden on all impacted systems. • Clause 5.28(d) – Intellihub welcomes the change to make the NT, AN, and AW files available to the MEP. However, our processes to update retailer switching are driven by the CS file and so we do not have any specific use cases in mind for these additional files unless proposal 4.55(q) to allow the gaining retailer to modify the site prior to switch completion proceeds. • Clause 5.28(f) – Please refer to our response to question 10, and specifically our response to 4.43(g). • Clause 5.28(i) – Intellihub believes this proposal should be revised to align with the precedent set in CRP5-016 which allowed retailers and distributors to measure their timeframe for updating the Registry based on when a dependent update by the MEP was completed. Intellihub would like to see the same treatment of MEP updates where these are delayed by ATHs, retailers or Registry functionality. In addition, if the Authority proceeds with this change, it would be useful to clarify the definition of the 12-month period.

	• Clause 5.28(k) – Intellihub believes that the Registry should not automatically end date meter components or certification when a distributer changes the ICP status to decommissioned. We feel this will lead to the incorrect assumption that this site is safe and the metering installation has been removed when it has not. Technically the MEP is still obligated for this site until we remove our assets. Intellihub feels that the MEP should still be able to update the Registry with their obligations in removing the assets and dating them to reflect when the physical removal occurred, therefore the distributor status should not impact the MEP updating their records correctly. • Clause 5.35 – Intellihub supports this proposal on that basis that our feedback on clause 4.43(f) under question 10 is adopted. Intellihub would not be comfortable supporting this requirement if a dependency is introduced between switching and configuration changes as this would introduce a delay while paperwork processing occurs post fieldwork, and this in turn would make it impossible to deliver readings to the retailer within 4 days of the switch in some cases.
Q15. (5.38) Do you agree with the benefits anticipated from the proposed solutions? Are there other benefits you can anticipate or improvements to operational effectiveness and efficiency? Can you quantify these benefits?	Intellihub agrees with the benefits of the proposed solutions, except in those areas where we have provided feedback in question 14.
Q16. (5.38) Do you anticipate the proposed solutions will introduce cost into your organisation, and if so, can you quantify this cost and/or provide a high - level description of the changes that need to be made?	Yes, we anticipate that changes are required to process and systems to support changes to trader switching. The diagram below provides a very high-level conceptual overview of our architecture with a heat map as to the areas impacted:  The key areas of changes will include:

	• Registry integration and reporting functions; • Meter Data Management; and • Reporting. We estimate that that these changes will cost approximately $385K for us to make in our current solutions. There are some small synergies with MTR and trader switching consultation. Being able to combine them into one programme of change activity within Intellihub would enable us to reduce the costs of delivering both outcomes. We anticipate only a minor uplift in on-going operating costs.
Questions on distributor switching	
Q17. (6.13) Do you agree with the proposed solutions? If not, what would you change and why?	Intellihub agrees with the Authority's proposed solutions.
Q18. (6.13) Do you agree with the benefits anticipated from the proposed solutions? Are there other benefits you can anticipate or improvements to operational effectiveness and efficiency? Can you quantify these benefits	Intellihub agrees with the Authority's anticipated benefits.
Q19. (6.13) Do you anticipate the proposed solutions will introduce cost into your organisation, and if so, can you quantify this cost and/or provide a high - level description of the changes that need to be made?	Yes, we anticipate that changes are required to process and systems to support changes to distributor switching. The diagram below provides a very high-level conceptual overview of our architecture with a heat map as to the areas impacted:  The key areas of changes will include: • Registry integration and reporting functions; and

	• Reporting. We estimate that that these changes will cost approximately $75K for us to make in our current solutions. We anticipate no change in on-going operating costs.
Questions on implementation	
Q20. (7.4) Would you prefer a single implementation or a staged implementation? Please give reasons for your preference	Intellihub considers it imperative that that the final form of all Code changes arising through this consultation is known as a first step towards implementation. This will enable participants to make the resulting programme of work as efficient as possible. We suggest the Authority also consider building in stages for further engagement with the industry regarding the final Code changes and implementation approach once a decision has been made on the scope of changes to be implemented. Intellihub's preference is that the implementation of any changes arising from this consultation is staged. We believe this will help participants by staggering the tasks such as development, testing, change management, and implementation.
Q21 (7.4) Do you agree with the suggested implementation timeframes? If not, please state your preferred timeframes and give reasons for your preference	Intellihub would prefer to see the implementation timeline for these changes set at 15 & 24 months. This would make it more likely that the changes can occur in parallel with planned application upgrade projects, and this outcome will reduce the total cost of implementation. Wherever practical we also ask that the Authority consider allowing an implementation window where participants can enable the capability to meet the new rules. This would mitigate the risk associated with a singular go-live date for the industry.
Questions on the regulatory statement	
Q22. (8.6) Do you agree with the objectives of the proposed MTR amendment s? If not, why not?	Intellihub agrees with the objectives of the proposed MTR amendments, noting the feedback we have provided in this document regarding the limited scope of benefits arising from MTR.
Q23 (8.11) Do you agree with the objectives of the proposed amendments to the switching process? If not, why not?	Intellihub agrees with the objective of the proposed switching amendments, subject to the feedback we have provide in this document.

Q24 (8.17(q)) Do you agree the benefits of the proposed amendment outweigh its costs?	Intellihub does not agree that the benefits outweigh the costs in some key areas of the proposals. These concerns are detailed in our response to questions 4, 10, and 14.
Q25. (8.21) Do have any comments on the preferred and alternative options discussed in the 2019 Issues paper?	As the industry and market has moved on since the original discussion paper in 2019, the new proposal should review the switching and Registry requirements based on today's needs and for potential future requirements.
Q26. (8.22(d)) Do you agree the proposed amendment is preferable to the 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.	Intellihub has provided feedback in questions 4, 10, 14 and 27 that would need to be reflected in the proposed amendment.
Q27. (8.25) Do you agree the Authority's proposed amendment complies with section 32(1) of the Act?	Yes, in principle we agree that the Authority's proposed amendment complies with section 32(1) of the Act regarding the promotion of competition and consumer choice, except as expressed in the feedback we have provided in response to questions 4, 10, and 27.
Question on Code drafting	
Q28. (Appendix A) Do you have any comments on the drafting of the proposed amendment?	Smart metering technology and the services they can provide have rapidly evolved since their inception in 2010, but the EIPC2010 Codes have not necessarily kept up with these changes. The industry should keep in mind what the Registry's core purpose is in regard to its systems' structure concepts. It appears the industry is trying to add Trader services to the Registry which was not the original intent of its design and there now appears to be a conflict with the proposed consultation limited Code amendments and has not gone fully into the actual required amendments to Parts 1, 10, 11 and 15 of the Code. There needs to be further detailed review of the Code to cater for the proposed changes to make sure there is no confusion between definitions, as currently there are some significant inconsistencies between Parts of the Code and these

	proposed changes exacerbate this issue. Especially as to what should be in Part 10, Part 11 or Part 15, which needs to be clarified when a final decision on the consultation paper is made. Some key examples are listed below. **Switch** • Part 11(1B) (1C) (1D) (1E) MEPs already have contracts with Traders regarding non comms and processes for addressing the problem. There are many reasons why a meter is not communicating that are out of the control of the MEP, and an investigation may not give a resolution. • Part 10 10.6 Electronic interrogation of metering installation (11) (12) (13) timeframes for AMI flags that have not been removed in Part 10, but new Registry fields added to Part 11. AMI communication status MEPs still have the obligation to update the Registry AMI type based on the maximum interrogation cycle. There are now two sets of measurements, and it appears if a site is AMI N there is no requirement to update the AMI communicating status. Part 11 Schedule 11.4 19 AMI type 20 AMI communication status. • C&I is a specific data type required by a Trader, not a meter type. ATHs install HHR meters and NHH meters certifying the installation accordingly using the same terminology. The access interface should be the responsibility of the MEP, not the ATH and can change according to Trader requirements. • Part 10 Clause 8A (3) Other participants have the ability to agree between themselves to deliver/receive different file formats and require EA approval why would the MEP's need to seek EA approval to do this. • Part 11 Schedule 11.4 Table 1(6) (18) MEPs can supply this data, and it is not a meter type. • Part 10 Schedule 10.7 (8) Metering installation certification requirements certification report these requirements refer to HHR and NHH or both. • Part 11 Schedule 11.4 Table 1(15) Need clarification of where these time stamps are derived from how they will

	work when combined with the number of days allotted to update the Registry. If recorded at the start of a 30-minute period will have events with the same timestamp. What is the process for reversing and replacing an incorrect file. • Part 16A: All participants should be audited as per the functions they are performing under the Code, not just MEPs, to make sure they are compliant. • Part 11 11.13D Pricing methodology for MEPs is contractual based on the service delivered. This Code change being included in Part 11 Registry Information Management is questionable and probably should be in Part 10 we the other MEP obligations regarding metering. • Part 11 11.3 (23) Metering Work by gaining trader – Any request asking an MEP to initiate work at a metering installation requires an MEP nomination if not requested by the current Trader showing on the Registry. Again, this has been added to Part 11; this should be in Part 10 (10.7) 1 to 6 Access to premises in which the metering installation is located in Part 10 (10.22) Change of a metering equipment provider. • Part 11 Schedule 11.4 18 C & I is not a meter type • Part 11 Schedule 11.4 3e 10 days reduced to 5 do not agree unless reliance on other participants and registry functionality is considered. • Part 11 Schedule 11.3 switch event meter reading (d) to two decimal places. The issue with this limitation to 2 decimal places is that is not how consumption data is currently delivered in a raw consumption data file and if this is a requirement it falls under Part 15 Schedule 15.2 (5) stating raw meter data used is not rounded or truncated from the stored data from the metering installation.