

15 May 2012

Submissions  
Electricity Authority  
PO Box 10041  
Wellington 6143

*by email:* submissions@ea.govt.nz

## **SUBMISSION ON MANDATORY POPULATION OF NEW FIELDS IN THE REGISTRY**

- 1 Orion New Zealand Limited (**Orion**) welcomes the opportunity to comment on the “mandatory population of new fields in the registry” consultation paper (the **paper**) released by the Authority in January 2012.
- 2 This submission is in two parts:
  - comments on relevant parts of the paper; and
  - responses to the Authority’s questions.

### **General comments**

- 3 We believe that the Authority must resolve the high level issue over the livening process before it embarks on detailed registry changes relating to the introduction of an initial energisation field. The serious questions and issues relating to the definitions of ‘Livening’ and ‘Energisation’ (raised both in submissions and at the authority’s workshops) must be resolved and the overall livening process agreed prior to any detailed specification of registry fields. Until these issues have been appropriately resolved we do not consider that it is appropriate to proceed with the proposed options.
- 4 We have previously advised the Authority that we consider the proposed definition of ‘Livening’ is inappropriate. The normal usage of the term “live” in the industry would be that it is electrically connected and at a voltage above earth, we believe it would be useful if the Authority consider the Electricity (Safety) regulations 2010<sup>1</sup> definition of ‘Live’:

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<sup>1</sup> <http://www.legislation.co.nz/regulation/public/2010/0036/latest/DLM2763501.html>



*live means charged with electricity so that a difference in voltage exists to earth or between conductors”*

and also the definition of live conductor:

**live conductor** means a conductor that is—

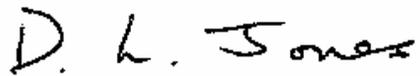
- (a) charged with electricity so that a difference in voltage exists to earth or between conductors; or
- (b) a neutral conductor).

- 5 The Authority’s use of the terms “Liven” and “Energisation” given that the definition of “liven” under the electricity (Safety) Regulations 2010 could lead to serious confusion and potential safety risks.
- 6 While we are comfortable with the trader requesting that the point of connection be Livened (energised), we believe that, on the first occasion that the point of connection is Livened (energised), this must be carried out by the distributor (or their agents). We also consider that in the event where Regulation 74 of the Electricity (Safety) Regulations 2010 applies then again the energisation should be carried out by the distributor (or their agents). Basically we need to insure that the regulatory aspects have been accepted i.e. inspected and safety verified [Electricity (Safety) Regulation 2010, Part 5 Safety of Installations, Regulation 73], and the health & safety aspects of the company/person undertaking the livening i.e. that they have a safe process and are trained and know the distributors equipment [Health and Safety in Employment Act 1992, section 16] and that the person livening has authority or permission from the distributor to liven the installation.
- 7 We consider that this is a very important issue that must be resolved before any further detailed work creating an energisation field on the registry can be implemented.
- 8 We note the Authority’s reference to collecting initialisation energisation dates as part of the responsibility to have and maintain a safety management system as required by section 61A of the Electricity Act 1992. We disagree. The Safety management system is related to the safety of the Network and associated works. We do not consider that collecting initialisation energisation dates forms part of this safety management system.
- 9 A further issue is the mandatory nature of these requirements when the paper appears to indicate on the registry these will be optional.

### **Concluding remarks**

- 10 Thank you for the opportunity to make this submission. Orion does not consider that any part of this submission is confidential. If you have any questions please contact Dennis Jones, DDI 03 363 9526, email [dennis.jones@oriongroup.co.nz](mailto:dennis.jones@oriongroup.co.nz).

Yours sincerely

A handwritten signature in black ink that reads "D. L. Jones". The signature is written in a cursive style with a large initial 'D' and a long horizontal stroke for the 'L'.

Dennis Jones  
**Industry Developments Manager**

## Appendix: Responses to the Authority's questions

Question No.	Question	Response
3.8.1	Do you consider the proposals are consistent with the objectives listed in section 3.2?	No, We believe in the case of the direct billed status field this can be carried out more efficiently by use of an existing field. In the case of the population of the initial energisation field the Authority must resolve the higher level issue over the livening process before it embarks on detailed registry changes.
In relation to proposal A – Mandatory population of initial energisation date field		
3.8.2(a)	whether you support or oppose the proposal;	Oppose
3.8.2(b)	the one-off and ongoing costs (excluding those set out in 3.3.7) of the proposal, if any, to your organisation;	N/A
3.8.2(c)	the one-off and ongoing benefits, if any, to your organisation;	Nil
3.8.2(d)	whether you propose any other amendments, and whether those amendments would change your position in (a);	No

3.8.2(e)	any other comments relevant to this proposal.	The Authority needs to resolve the high level issue over the livening process before it embarks on detailed registry changes. The definitions of Livening and Energisation must be resolved and the overall livening process agreed to prior to any further work on this issue. Until these issues have been appropriately resolved we do not consider that it is appropriate to proceed with any option. See also our comments in the main body of this submission
In relation to proposal B – Mandatory population of direct billed status field		
3.8.3(a)	whether you support or oppose the proposal;	Oppose
3.8.3(b)	the one-off and ongoing costs (excluding those set out in 3.3.17) of the proposal, if any, to your organisation;	\$5,000 to \$10,000 one of cost to modify our Connections database with an additional field and staff training.
3.8.3(c)	the one-off and ongoing benefits, if any, to your organisation;	Nil
3.8.3(d)	whether you prefer the alternative proposal as set out in section 3.4;	No
3.8.3(e)	whether you propose any other amendments, and whether those amendments would change your position in (a);	Yes, we propose the use of the existing price category field, we currently use this field to indicated that an ICP is direct billed. This proposal is superior to the paper's proposal and the paper's alternative because it avoids any additional cost and provides the required information.
3.8.3(f)	any other comments relevant to this proposal.	

In relation to the creation of the initial energisation field as described in section 2.2, please state:		
3.8.4(a)	whether you agree or disagree with the decision to create the field (noting that agreement is not an endorsement of the process);	Disagree until the higher level issues over the Livening process have been resolved
3.8.4(b)	the one-off and ongoing costs (including those set out in 3.3.7), if any, to your organisation.	
In relation to the creation of the two direct billing fields as described in section 2.2, please state:		
3.8.5(a)	whether you agree or disagree with the decision to create the fields (noting that agreement is not an endorsement of the process);	Disagree
3.8.5(b)	the one-off and ongoing costs (including those set out in 3.3.17), if any, to your organisation.	We believe the initial costs are understated, we will have to modify our Connections database and train staff which will cost far more than the \$1000 suggested.