

4 May 2012

Retail Operations  
Electricity Authority  
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by email: retailoperations@ea.govt.nz

## **SUBMISSION ON NEW REGISTRY CONTENT CODES AND METER LOCATION CODES**

- 1 Orion New Zealand Limited (**Orion**) welcomes the opportunity to comment on the “Proposed new register content codes and meter location codes” Memo (the Memo) of 17 April 2012.

### **Registry content codes**

- 2 We do not agree, as stated in paragraph 5 of the Memo, that register content codes “define what control is exerted over the metered circuit.” The Electricity Authority Registry Functional specification<sup>1</sup> indicates that the register content code is “A code that identifies the type of information being recorded by the channel e.g. winter, triple saver peak etc. Selected from a list in the registry.” This code, together with period of availability, distributor pricing category and other information may assist retailers to determine which of their retail pricing plans to apply, but it does not necessarily convey any information about control, and it may or may not map directly or in a one-to-one fashion to distributor pricing. We urge the Authority to be more careful in describing information in future, particularly when there is a perfectly good accepted definition available.
- 3 Having said that we have no issue with the proposals from Meridian and Contact over the proposed new register content codes.

### **Meter location codes**

- 4 We consider that the Authority should consider the proposal in our submission on “Creating additional fields in the registry” dated 7 February 2012 that:

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<sup>1</sup> Page 16 The Electricity Authority Registry Functional specification1 – Part 10 changes Version 19A.2 (MEP version) 23 March 2012



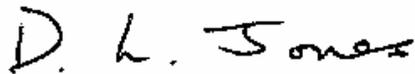
*“... the metering equipment provider provide GPS co-ordinates for metering installations. This is likely to produce useful information and in most cases will be a reasonable proxy for an ICP location.”*

- 5 However, we have no objection to the introduction of the proposed meter location codes with the proviso that the definition of the meter location code “FC” has another code “FW” as part of the definition, this “FW” should be articulated in full.

### **Concluding remarks**

- 6 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 letters are cursive and slightly slanted to the right.

Dennis Jones  
**Industry Developments Manager**