

18 July 2017

## Submissions

Electricity Authority  
PO Box 10041  
Wellington 6143

by email: [submissions@ea.govt.nz](mailto:submissions@ea.govt.nz)

### **Consultation Paper - Proposed minor amendments to ICP status reasons and register content codes**

1. Orion New Zealand Limited (Orion) welcomes the opportunity to comment on the Electricity Authority's (the Authority) consultation paper (the paper) on proposed minor amendments to ICP status reasons and register content codes.
2. This submission responds to the paper's request for views on amendments in the registry relating to three areas;
  - (a) item one: changes to ICP status reasons
  - (b) item two: rename the register content codes to reflect summer and winter
  - (c) item three: add three new register content codes
3. Our submission addresses the specific questions asked.

### **Concluding remarks**

4. Thank you for the opportunity to make this submission. We do not consider that any part of this submission is confidential. If you have any questions please contact Dayle Parris (Regulatory Manager), DDI 03 363 9874, email [dayle.parris@oriongroup.co.nz](mailto:dayle.parris@oriongroup.co.nz).

Yours sincerely



Dayle Parris  
**Regulatory Manager**

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## Appendix I Format for submissions

Submitter	Orion New Zealand Limited
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#	Question	Comment
Question 1	<i>Item One Question:</i> Do you agree with proposed amendments to the ICP status reasons? If not, please provide details.	We agree with the proposed amendments to the existing ICP status reasons. We agree with the proposed discontinuation of ICP status reasons 8, 9, 10, 11.
Question 2	<i>Item One Question:</i> Are the proposed descriptions of the ICP status reasons suitable? If not, please provide details and suggest alternative descriptions.	We agree with the proposed descriptions of the ICP status reasons.
Question 3	<i>Item one question.</i> Do you agree with the proposed new ICP status reasons? If not, please provide details.	We agree with the new ICP status reasons 13 and 14.  The EA should be aware that if the intent of the ICP status reason 15 is to collect credible statistics on off-grid activity by consumers this may not be achieved with the new code for the following reasons:  - some off-grid facilities may never connect to the distribution system (i.e. they are greenfields off-grid),

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		<p>- some may be recorded as status reason 4, to become status reason 15 either the customer must specifically state their reason for the deergisation is to go off-grid or the retailer must specifically ask if this is a reason</p> <p>- some may be recorded as status reason 6</p> <p>With respect to new ICP status reason 15 we agree that the option to decommission when customers go off-grid should be preserved. Retaining asset/capacity that is not being used presents a cost to electricity distribution businesses however an electricity distribution business may also choose to retain the asset if there is a possibility an ICP may connect again in the near future (there is also a cost in removing asset). There may be a difference between physical decommissioning of asset and 'paper' decommissioning of an ICP.</p>
Question 4	<p><i>Item one question.</i> What period of time would you require to adjust systems to accept any proposed changes to the ICP status reasons? Please provide details.</p>	<p>We believe it would take no longer than one day to adjust systems to accept the proposed changes to the ICP status reasons.</p>

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#	Question	Comment
Question 5	Item one <i>question</i> . Would there be a significant cost to you to implement these proposed changes? Please provide details.	No, we would use internal IT resource.
Question 6	<i>Item two question</i> . Do you agree with the proposal to seasonally align the register content codes? If not, please provide details.	Yes
Question 7	<i>Item two question</i> . If the register content codes are seasonally aligned, do you agree the current codes be converted to the new proposed codes by the MEP? Do you believe the change should occur in a different manner? Please provide details.	Yes, we agree the current codes be converted to the new proposed codes by the MEP.
Question 8	<i>Item two question</i> : If you do agree the MEP should convert the register content codes so they are seasonally aligned, what period of time would the MEP require to do so?	N/A- we are not an MEP
Question 9	<i>Item two question</i> . What period of time would you require to adjust systems to	N/A

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#	Question	Comment
	accept the proposed changes to the register content codes? Please provide details.	
Question 10	<i>Item two question.</i> Do you agree with the Authority’s estimated costs for participants? Would this be a significant system change for you? Please provide details.	N/A- not a significant change for us.
Question 11	<i>Item three question.</i> Do you agree with the proposed register content codes? If not, please provide details.	<p>Yes</p> <p>With respect to register code INEM –the inclusion of the code allows us to support the EA position that load control, at least for emergency situations, should be preserved, maintained and provided. It will also assist the Retailer/Trader to provide transparency of this type of control and the requisite componentry.</p> <p>The definition of emergency seems overly prescriptive and may create confusion given the wide use of the term emergency within our industry. Is it necessary to define emergency given the earlier description provided in section 3.13(a)?</p>
Question 12	<i>Item three question.</i> If approved, do you agree the proposed register content codes be effective immediately? If not, please provide details.	Yes

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#	Question	Comment
Question 13	<i>Item three question.</i> If approved, would the addition of the new register content codes be a significant system change for you? Please provide details.	No