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SUBMISSION ON ROUTINE TESTING OF ASSETS (SECOND ROUND)

- 1 Orion New Zealand Limited welcomes the opportunity to submit on the December 2007 *Routine Testing of Assets Consultation Paper (Second Round)* (the *paper*). We outline our comments below.
- 2 We are disappointed with the Electricity Commission's response to our original submission on this issue, where we outlined several serious concerns about the proposed rule 13. We are particularly concerned that the Commission appears to have overlooked significant issues raised in our submission.
- 3 We note that the Commission's analysis of submissions, as described in the paper under the heading *key issues raised in submissions*¹, does not reference the following two key points from our original submission:
 - 3.1 firstly, the lack of any limits to the scope of the proposed sub-rules 13.1, 13.2 and 13.3, as follows:

We are particularly concerned with the proposed distributor requirements set out in rule 13 of the proposed appendix B to technical code A.

Orion considers that this rule is poorly conceived and may have serious adverse consequences. We believe that it will not achieve

¹ Paras 10 to 26 and Table 2 (key issues) of the paper.

the objective of assisting the system operator to meet its PPOs. We outline our various concerns about this rule below.

*While we assume it is not the Commission's intent, we are very concerned that a plain English reading of subclauses 13.1, 13.2 and 13.3 requires distributors to test **all** their protection systems relays within the proposed timeframes.*

We consider that the obvious intention of rule 13 is to protect the integrity of the interconnected transmission grid, rather than the lower reaches of a radial distribution network. Therefore the protection testing regime, if any, should be limited to exclude distribution equipment.

- 3.2 secondly, subclause 13.4 suggests testing *the operation of the protection system measuring circuits on its a.c. assets at least once every 4 years*. We remain concerned that, as stated in our earlier submission:

... subclause 13.4 could be interpreted to require asset owners to carry out primary injection testing every four years. This would be unnecessary and costly. In our opinion, only secondary injection testing is required. Primary injection testing is normally only carried out during commissioning or re-commissioning after significant changes.

- 4 The Commission's failure to address these key issues is of serious concern to us – we remain of the opinion that these are valid concerns that need to be addressed.

Recommendations

- 5 We recommend that the scope of any mandatory testing regime be limited by adding the words ***in relation to their assets at a grid interface*** to the start of rule 13 as follows:

13 Asset owner a.c protection systems

In relation to their protection assets at a grid interface each asset owner must:

13.1 ...

- 6 This addition would limit the scope of the rule to align with the system operator's protection asset requirements, as set out in section 6 of its *Distributor Asset Capability Statement*,² which clearly states the prescribed information is only required for assets at the grid interface.³
- 7 We also recommend that rule 13.4 be altered to provide that:

...in general, systems are to be checked using secondary injection only. No fixed terminations are to be disturbed in order to carry out the test.

Concluding remarks

- 8 Thank you for the opportunity to make this submission. No part of this submission is confidential. If you have any questions, please contact Dennis Jones (Industry Developments Manager), DDI 03 363 9526, email dennis.jones@oriongroup.co.nz.

Yours sincerely



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² Version 5, released 17 March 2004.

³ <http://www.transpower.co.nz/notion/share/download.asp?cid=5960&csid=19000&mdid=&file=%2Fupload%2Fnotion%2Fsectionimages%2F19000%5Fdistributor%2Dacs%2Exls>