



30 April 2018

Submissions

Electricity Authority
PO Box 10041
Wellington 6143

by email: submissions@ea.govt.nz

Submission on consultation paper—Connection and electrical connection guidelines

1. Orion New Zealand Limited (Orion) welcomes the opportunity to comment on the Electricity Authority's (the Authority) consultation paper (the paper) on the connection and electrical connection guidelines.
 - a. Our submission covers our response to your specific questions.

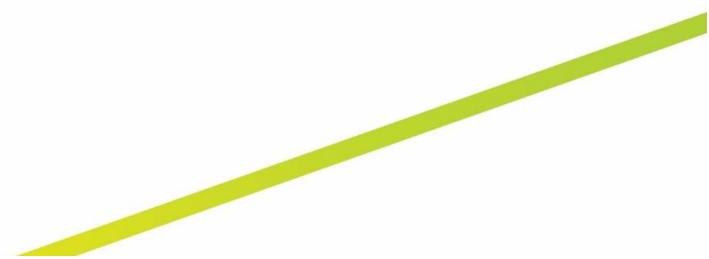
Concluding remarks

2. 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.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'DP', is written over a thin blue horizontal line.

Dayle Parris
Regulatory Manager



Appendix I Format for submissions

Submitter	Orion New Zealand Limited
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1. Types of points of connection

- introduction to points of connection
- network supply point
- installation control point

Response:

Is the section understandable?

Yes, Figure 1 is very useful.

Is the level of detail sufficient?

We note that DUMML ICPs are not included in the diagram. We appreciate that these ICPs don't represent an ICP that can be connected or electrically connected being often a 'representative' ICP at GXP for a population of streetlighting connections feed from that GXP on the streetlight circuit. Perhaps it should be noted why this type of ICP is not included in the diagram.

Are any relevant issues left out?

No

2. Connecting and electrically connecting

Response:

Is the section understandable?

Point 3.15 is missing the word 'to' before electrically connect in the first sentence.

We suggest that the underlined bolded sentence in point 3.6 would be more appropriately worded as "As a rule, ~~both connected~~ service lines and conductors on the network side of the isolation device should be treated as live at all times."

We suggest that the underlined bolded sentence in point 3.9 would be more appropriately worded as "As a rule, ~~both all disconnected~~ service lines and conductors on the network side of the isolation device should be treated as live at all times."

We suggest that the underlined bolded sentence in point 3.15 would be more appropriately worded as "As a rule, ~~both~~ service lines and conductors on the network side of the isolation device should be treated as live at all times."

Given that this document is not specifically a safety document perhaps an alternative to inserting the 'safety' message throughout the document could be to state this once at the start of Section 3.

Is the level of detail sufficient?

At a high level my understanding is that the connection and electrical connection guidelines have a particular focus on reconciliation rather than the operations and maintenance of a network. That is, the focus is on when the metering is electrically connected. If so, perhaps this is important to point out clearly and early in the document. This may alleviate the debate that occurs around the definition of connection and electrical connection.

Are any relevant issues left out?

N/A

3. Isolation for electrical connection/electrical disconnection of a POC

Response:

Is the section understandable?

Yes

Is the level of detail sufficient?

Yes

Are any relevant issues left out?

Yes

4. Code obligations for new POCs

- connecting and electrically connecting a grid NSP
- connecting and electrically connecting an interconnection NSP
- connecting and electrically connecting an ICP that is not also an NSP

Response:

Is the section understandable?

Section 5.39(a) contains the statement “An interconnection point cannot exist within a network owner by an entity that is a distribution network owner/operator.” This sentence is difficult to understand. A better wording could be, “An interconnection point can only exist between two networks and not between a network owner and another entity in the same network.’

Section 5.6.3 (a) contains the statement “An interconnection NSP can be electrically connected only if (a) a distributor has not disconnected the interconnection NSP for safety reasons, and has not subsequently approved the electrical connection”. We’re not sure this sentence makes sense because it appears to say that ‘an interconnection NSP can be electrically connected only if a distributorhas **not** subsequently approved the electrical connection.’ We suggest the word ‘not’ be removed.

Point 5.38 needs the word “provide” changed to “provided”.

Point 5.97 needs to be reworded to say “Traders are responsible for **ensuring** that there is a metering installation at ~~an~~ electrically connected ICPs and that all electricity conveyed is quantified in accordance with the Code.”

Point 5.102 needs to be reworded to say “The first time electrical connection of an ICP requires both the distributor and the reconciliation participant that is responsible for the ICP identifier in the registry to authorize an ICP to be electrically **ly** connectioned.”

Point 5.119 (a) is missing the word ‘meanings’ at the end of the definition of electrical disconnection from the Code.

We suggest that the underlined bolded sentence in point 5.105 and 5.109 would be more appropriately worded as “As a rule, **both** service lines and conductors on the network side of the isolation device should be treated as live at all times.”

Given that this document is not specifically a safety document perhaps an alternative to inserting the ‘safety’ message throughout the document could be to state this once at the start of Section 3.

Is the level of detail sufficient?

No- We recommend adding some commentary on the responsibilities of MEPs in the connection and electrical connection process. 5.122 (d) should be made clear that the electrical connection refers to the metering component rather than connection to the network. Refer to our response to section 2 above. MEPs need to be timely with their paperwork and make best endeavors to work in with living agents.

Are any relevant issues left out?

It would be useful to point out in the section on ‘provision of metering at an interconnection NSP’ that there is an avenue by which a distributor can obtain an exemption from installing metering in the right circumstances. We refer to exemption 204 as an example.

5. Connecting and electrically connecting: additional considerations

Response:

Is the section understandable?

We suggest that point 6.3 comes before 6.2 to set the scene and then existing 6.2 becomes 6.3 and provides examples. If you adopt this suggestion then existing 6.3 should be begin with 'There' rather than 'These'.

Is the level of detail sufficient?

Yes

Are any relevant issues left out?

Yes