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Electricity Authority
PO Box 10041
Wellington 6143

Submitted via email to policyconsult@ea.govt.nz

**Improvements to industry switching processes: technical consultation paper**

1. Orion welcomes the opportunity to provide feedback to the Electricity Authority (Authority) on the technical consultation paper – Improvements to industry switching processes (Consultation Paper).

2. Orion owns and operates the electricity distribution infrastructure in central Canterbury, including Ōtautahi Christchurch City and Selwyn District. The network is both rural and urban and extends over 8,000 square kilometres from the Waimakariri River in the north to the Rakaia River in the south; from the Canterbury coast to Arthur's Pass. Orion delivers electricity to more than 233,000 homes and businesses and is New Zealand's third largest Electricity Distribution Business (EDB).

**Introduction**

3. The Consultation Paper raises a number of proposals to update the industry's switching processes. Orion largely sees these proposals as a positive step towards improving information flows and outcomes for consumers. However, there are a few areas where the proposals would create the need for either manual workarounds or system builds where a proportionate benefit has not been clearly identified. We also have concerns that the suggested timeframe for implementation is overly ambitious. Given this, the focus of this submission is on part 7 of the Consultation Paper (Distributor ICP switching process changes) and part 8 (Implementation timeframe and options).

4. Orion appreciates that the Authority has taken on board industry feedback and decided not to progress multiple trading relationships (MTRs) to a Code amendment at this stage. Orion remains supportive of the concept of MTRs. Establishing a regulatory-led sandbox to trial a range of MTR use cases is a practical step to progress this work without imposing significant cost on a concept that has not yet been well justified.

**Distributor ICP switching process changes**

5. From a practical point of view, Orion's main concern relates to the proposed requirement to record the decommissioned date in the registry as the first full day that the ICP is decommissioned (that is, the day after the physical work was performed to decommission the ICP). Orion currently records the decommissioned date in the registry as the actual date it was decommissioned. If this change were to proceed, Orion would still need to record the actual date in our own systems. This would create an extra step and require us to maintain records for two dates, causing us to either have a manual workaround or a costly system change. Furthermore, it would also likely require the electronic application that our field agents use to decommission ICPs to be updated.

6. It is unclear to Orion why this sits as a distributor switching proposal and more importantly, how much of a benefit it would provide industry. In the 2019 consultation paper on this issue, the Authority determined that it would better promote operational efficiency by removing the need to manually resolve misaligned changes to ICP information in the registry[1]. We also understand that it is intended to allow distributors to invoice for the day the decommissioning occurred. This proposal would not remove the need to manually resolve misaligned changes to ICP information (rather, it would cause it). Furthermore, any additional ability to invoice would be minimal and does not warrant being considered as a benefit. Given this, Orion does not support this proposed requirement.

7. Orion also has some concerns with regard to the proposed requirement for distributors to allocate a reconciliation type in the registry to ICP identifiers, when the ICP is connected to a network extension. Our primary concern relates to the requirement to identify and flag legacy ICPs as network extensions. The reason for needing this information has not been demonstrated and whilst we may be able to accommodate this for new ICPs, we do not have the ability to apply this retrospectively and do not support this aspect of the proposal.

8. Finally, Orion shares the views expressed by the Electricity Network Association (ENA) in its submission relating to the provision of an ability for the Authority to stop a distributor switch where circumstances reasonably require, at any time during the switch process. This, and the proposed ability to instruct the registry manager to reverse a completed transfer, would cause complexity for Orion. Complexity and the resulting likely system build is not an issue in and of itself but there doesn't appear to be a clear case for the Authority needing to have this ability. Given the lack of a clear, material benefit, any intervention during an in-progress operational process is regulatory overreach which Orion does not support.

**Implementation timeframe and options**

9. In general Orion is committed to achieving the Authority's ambitious implementation timeframes and engaging as much as possible in processes to ensure the best outcomes for consumers and the wider industry. However, the volume of different Authority workstreams is putting considerable strain on networks, either through the implementation of significant change or engagement on potential future change. Orion is concerned that the same resources required to get a good grasp on the implications of the proposals in this Consultation Paper are also engaged with achieving the implementation timeframes already in place by the Authority for other initiatives. This leaves a risk that whilst Orion has provided feedback it may be that we have not been able to assess the proposals as thoroughly as they warrant.

10. Keeping the above in mind, at this stage, Orion sees that the 12-month timeframe for implementation is not workable. Given distributor switches occur relatively infrequently, as an alternative, we may be able to manage some of the changes manually in the short-term. However, for many others (for example, retro fitting network events into the Registry), it would present a significant challenge and resource draw. It is not something

[1] https://www.ea.govt.nz/documents/6596/Switch_process_review_-_Issues_with_the_ICP_switching_processess_and_possible_options.pdf

Orion could comply with, within the proposed timeframe.

**Concluding remarks**

11. Orion is supportive of the Authority looking to improve the industry's switching processes. We are also more generally supportive of achieving ambitious implementation timeframes to get benefits out to the industry at pace. However, in this instance Orion is concerned, given the number of network reforms underway, that we haven't been able to fully assess the impacts of the proposed changes. We have reservations about some proposals and we will realistically be unable to meet the proposed timeframes where system changes are required.

12. Please see Appendix A for responses to the specific questions posed in the Consultation Paper.

Yours sincerely

Grace Burtin
Regulatory Lead – Electricity Authority

Appendix A

| **Q1. Would you prefer an implementation timeframe longer than 12 months?**<br>**If so, please indicate if 15 or 18 months is preferred and give reasons why.** |
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| Yes. As indicated in paragraphs 9 and 10 in the body of this submission, the implementation timeframe is a real concern for Orion. A more realistic timeframe for us would be closer to 24 months. |

| **Question 2: Are there any parts of the Code drafting that, in your view, do not accurately reflect the provisional decisions outlined in this paper?**<br>**If so, please identify the issue and set out any proposed amendment(s).** | |
|---|---|
| **Part/ Clause** | **Comments** |
| **Part 1 Preliminary provisions**<br>1.1 Interpretation | No comment |
| **Part 10 Metering**<br>Schedule 10.6 - Metering equipment provider ongoing obligations and functions | No comment |
| **Part 11 Registry information management** | No comment |
| **Schedule 11.1** | No comment |

| **Question 2: Are there any parts of the Code drafting that, in your view, do not accurately reflect the provisional decisions outlined in this paper?**<br>**If so, please identify the issue and set out any proposed amendment(s).** | |
|---|---|
| Creation and management of ICPs, ICP identifiers and NSPs | |
| **Schedule 11.2**<br>Transfer of ICPs between distributors' networks | No comment |
| **Schedule 11.3**<br>Trader switching | No comment |
| **Schedule 11.4**<br>Metering equipment provider switching and registry metering records | No comment |
| **Table 1: Registry metering records**<br>**Part 16A Audits** | No comment |

| **Q3. Other feedback**<br>**If you have any other feedback on the draft Code amendments, please detail this below:** |
|---|
| Orion has no comments on the specific Code drafting. Orion is more concerned with the principles behind some of them, as discussed in the body of this submission. |