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Submissions  
Electricity Authority  
Level 7, ASB Bank Tower  
2 Hunter Street  
Wellington

VECTOR LIMITED  
101 CARLTON GORE ROAD  
PO BOX 99882  
AUCKLAND 1149  
NEW ZEALAND  
+64 9 978 7788 / VECTOR.CO.NZ

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

## Submission on Register Content Codes – 2017 Operational Review

### Introduction

1. This is Vector Limited's (Vector) submission on the Electricity Authority's (the Authority) consultation paper, *Register content codes - 2017 operational review*, dated 7 August 2017.
2. We set out below our responses to the consultation questions.
3. No part of this submission is confidential. Vector's contact person for this submission is:

Luz Rose  
Senior Regulatory Specialist  
[Luz.Rose@vector.co.nz](mailto:Luz.Rose@vector.co.nz)  
04 803 9051

### Responses to consultation questions

Q1: *Do you agree the issues identified by the Authority require attention? If not, please explain why.*

4. Yes. Greater clarity on roles and responsibilities would benefit market participants, in addition to having all the relevant information readily available.

Q2: *Do you agree that the proposed business requirements around period of availability and distributor's pricing information would support the accurate application of register content codes and periods of availability for ICP based volume prices? If not, please explain.*

5. Yes. The proposed business requirements will provide a consistent and more flexible market approach to register content codes and period of availability (POA) values for mass market TOU delivery prices. This would significantly reduce the likelihood that additional register content codes will be required for mass market TOU delivery prices, reducing the time, effort and costs of introducing new customised content codes.

6. The cost implications for Vector's metering business (Advanced Metering Services) will depend on whether we decide to implement content codes as requested by traders, or implement all changes up front, which is likely to have a higher upfront cost.

*Q3: Do you agree with the Authority's preferred Option D, which introduces generic register content codes for mass market TOU prices, and for consistency deletes existing customised codes that specify time blocks in the description? If not, which option do you prefer and why?*

7. Yes. We agree on the basis that any changes will be implemented going forward, i.e. there will be no requirement to retrospectively update old codes. Otherwise, we would prefer Option C.
8. We seek clarification from the Authority how the proposed changes will account for distributors' weekday definitions that exclude public holidays, and how this might be managed when public holidays vary across New Zealand.

*Q4: If the Authority implements Option D, we propose to allow participants 6 months to convert from using the customised register content codes to the corresponding generic register content codes (mapping demonstrated in Appendix C). Would this be sufficient time? If not, please advise how much time would be reasonable.*

9. Yes, provided the changes would not require retrospectively updating old codes. Our metering business would not be able to retrospectively convert the codes already in our systems.
10. Our distribution business sends out EIEP12 files recognising price changes at the end of the calendar year, in line with our consultation and notification timeline with traders. We seek clarification from the Authority whether we would need to re-publish this file once the changes are made.

*Q5: Do you agree that the Authority should progress a Code change to mandate that a distributor's pricing information must contain certain information to assist MEPs and traders to consistently and accurately apply register content codes and periods of availability for ICP based volume prices? If not, please explain why.*

11. Yes. To remove any inconsistencies in the interpretation of a distributor's pricing information, we believe the way it is displayed should be standardised and clearly specified. Currently market participants are required to search each distributor's website to find this information (if available), as there is currently no default POA. Sometimes this requires a best guess as to what the correct POA is.
12. Another option would be for the Authority to collate and hold the POAs, similar to the approach used for the register content code table. This would then become the reference point for all registry users.

*Q6: Do you agree with the objectives of the proposed amendments? If not, why not?*

13. Yes.

*Q7: Do you agree the benefits of the proposed amendments outweigh the costs? If not, please explain your reasons.*

14. Potentially, yes. Implementing this option will improve our ability to operate in the market only if traders pursue the use of these codes.

15. Updating our systems with the proposed generic codes, and changes to current standard codes, will cost our metering business approximately \$100,000.

*Q8: Do you agree the proposed amendments are preferable to other options? If you disagree, please give reasons.*

16. Yes.

Yours sincerely

For and on behalf of Vector Limited



**Richard Sharp**

Head of Regulatory and Pricing