

10 April 2013



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Sent by email to: submissions@ea.govt.nz

Proposed transitional and minor Code amendments to Parts 10, 11 and 15

1. Vector welcomes the opportunity to respond to the Electricity Authority's (Authority) consultation paper *Proposed transitional and minor Code amendments to Parts 10, 11 and 15*, dated 20 March 2013. No part of this submission is confidential and we are happy for it to be publicly released. Please see Appendix A below for Vector's responses to the Authority's questions
2. Vector's contact person for this submission is:
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Yours sincerely,

A handwritten signature in blue ink that reads "B. Girdwood".

Bruce Girdwood
Manager Regulatory Affairs

Appendix A Vector's response to submission questions

Question No.	Question	Response
1	Do you agree with the proposal to amend the timing requirements for participant obligations during the metering rules transition? If not, please give reasons.	<p>No. Please see Vector's previously submitted comments on transition plans.</p> <p>However, we consider that there will be some major operational implications on AMS if switching is allowed to continue during the registry outage and be backdated, such as sending consumption data to the incorrect trader if the ICP has switched and this is not visible to us. Remote disconnections will also be impacted during this period, as there will be a risk of disconnecting after the customer has switched trader.</p> <p>Furthermore, populating event dates prior to Friday 24 May could cause issues with, and confuse, responsibilities as the current MEP may not have been responsible at that date. Vector recommends that it be mandated that event dates no earlier than the 24th be allowed.</p>
2	Do you agree with the proposal to amend the timing requirements for trader obligations to populate the ANZSIC code after the transition to the metering rules? If not, please give reasons.	Not applicable.
3	Do you agree with the proposal to remove the provision that prevents traders from providing the ANZSIC business code where there is no applicable code for the consumer? If not, please give reasons.	Not applicable.

4	Do you agree with the proposal to amend the timing requirements for trader obligations to maintain registry information after the transition to the new metering rules? If not, please give reasons	Not applicable.
5	Do you agree with the proposal to amend the requirements for a material change audit of a reconciliation participant's facilities, processes and procedures during the metering rules transition? If not, please give reasons.	Not applicable.
6	Do you agree with the recommendation to change meter component serial number to meter component identifier as detailed? If not, please give reasons.	Vector agrees.

7	Do you agree with the analysis of the current practice? If not, please give reasons.	<p>Vector agrees with the amendments listed in Clause 4.3.8 on page 19 but believe it should go further to incorporate the following principles:</p> <ol style="list-style-type: none"> (1) Any change to wiring or settings in the LCD or meter which alter the 'Energy to Register Allocation constant' WILL evoke the need to recertify the MI. (2) A like for like change of the entire LCD with another one (with the same settings) WILL NOT evoke the need to recertify the MI. (3) An alteration of a 'variable' peak load setting of an LCD (be it the replacement or reprogramming of the same LCD on site) for another variable setting WILL NOT evoke the need to recertify the MI as the same element and register continue to record the energy. (4) Bridging of an LCD or the Unbridging of it WILL NOT evoke the need to recertify the MI; this only means that the Traders ability to trade on the site using a 'Controlled Load Profile' will be affected [Bridged for longer than 10 days removes the ability to and unbridging reinstates it] Unless at the time of 'Unbridging' there is also a change to the wiring configuration relative to 'Energy to Register Allocation'. <p>Note: In all of the above cases the LCD must be left in a 'certified' state following the Test Houses approved certification processes. (the Rules stated in 4 above are relative to the particular work carried out at the time) Vector recommends this addition because there are other actions that can be performed on LCDs other than bridging or other (hot water or other) fault restoration work.</p>
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8	Do you agree that there are efficiencies to be gained by relaxing the replacement requirements under the conditions noted? If not, please give reasons.	See above.
9	Do you agree with the recommendation to allow replacement of control devices by a party other than the certifying approved test house? If not, please give reasons.	Vector agrees, however only under approved conditions. Namely, pre- approval from the ATH concerned (that previously certified the installation), this would then tie in with the other aspects of Part 10 that gives the original certifying ATH the opportunity to assess whether their original certification can still apply.
10	Do you agree with the proposed change to line 21 of Table 1 of Schedule 11.4? If not, please give reasons.	<p>No. Vector considers that this should be extended further to remove the requirement to populate the removal date all together. Note the registry functional specification v19A.7 shows this field being optional in the MM-010 file.</p> <p>As the trader should be advised by the MEP of the date when components are removed there is little value in recording this in the registry. Furthermore, as only active components can be viewed it is not understood how this information could be used anyhow.</p> <p>The removal date is derived from the event date of the event which occurred to displace the meters – i.e. the event date where the meter is no longer present in the record. The way MEP nomination occurs could potentially lead to the MEP inheriting the responsibility for correcting meter details for legacy meters on sites where it has been nominated and completed its first job. We see no benefit in having to undertake corrective action to update the registry for a legacy meter on which the MEP's first and last action was to displace.</p>

11	Do you agree with the proposal to change line 30 of Table 1 of Schedule 11.4? If not, please give reasons.	Vector agrees.
12	Do you agree with the analysis outlined above? If not, please give reasons.	Vector agrees.
13	Do you agree with the proposal to change clause 4(a) of Schedule 10.8? If not, please give reasons.	Vector agrees, however we note that Schedule 5 only lists standards for electronic ripple control receivers and time switches. It is assumed then that load control devices which do not fit into these categories do not need to meet any particular standard. It is also assumed that the word "new" means "not previous installed".
14	Do you agree with the proposed Code amendments to the livening definition? If not, please give reasons.	Vector agrees.
15	Do you agree with the Authority's evaluation of costs and benefits? Please give reasons or alternative costs or benefits.	Vector partially agrees. Section 4.2: It is unclear what the reference to including data storage devices means. Section 4.4: This would incur additional costs to MEPs with no identifiable benefit.
16	Do you agree with the Authority's evaluation of alternative means of achieving the objectives of the proposed amendments? Please give reasons.	Vector agrees.
17	Do you consider that there are alternatives that have not been considered? If so, please detail these.	Section 4.4 should have included an alternative to making the removal date optional in all cases.