

16 June 2006

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## **SUBMISSION ON ADDITIONS TO THE CENTRALISED DATASET**

- 1 Orion welcomes the opportunity to submit on the paper recently released by the Electricity Commission (the *Commission*) on *centralised dataset additions (the paper)*.

### **Embedded generation data**

- 2 Orion remains unconvinced that including embedded generation data in the dataset would help identify the loads behind grid exit points (GXPs).
- 3 We note that the required data relates only to embedded generation that exports to the local network and this data is already included in the reconciliation process. In many cases embedded generation does not export to the local network. Instead, it supplies its own local load. While it is not separately reconciled, it still impacts on the load behind the GXP.
- 4 We also note that other factors such as distribution companies' pricing structures and load management policies may impact more than embedded generation on loads behind GXPs.
- 5 However, if the provision of embedded generation data to the centralised data base:
  - 5.1 is carried out by the reconciliation manager;
  - 5.2 is based on reconciled data supplied to the reconciliation manager;

- 5.3 does not add any additional cost to embedded generators; and
- 5.4 does not add any additional compliance requirements to embedded generators

then we have no objection to embedded generation data collected and collated as part of the reconciliation process being published.

### **Lake level data**

- 6 We consider that under normal circumstances the summary lake level data provided by M-Co and Energy Link is sufficient. However, at times when the lakes levels are low and there is a reasonable probability of a dry year event, it would be useful for the Commission to make more detailed information publicly available.

### **Concluding remarks**

- 7 Thank you for the opportunity to make this submission. If you have any questions, please contact Dennis Jones (Industry Developments Manager) DDI 03 363 9526 email [dennis.jones@oriongroup.co.nz](mailto:dennis.jones@oriongroup.co.nz).

Yours sincerely



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