

Electricity Networks Association

7th Floor, Computerland House, 154 Featherston Street
PO Box 1017

Wellington, New Zealand

Telephone: 64-4-471 1335 Fax: 64-4-496 5209

E-mail adj@electricity.org.nz

31 January 2005

Submission on Electricity Commission Consultation Paper

Centralised Dataset

The Electricity Networks Association, representing electricity distributors, has the following points to make on the issues raised for discussion in the consultation paper:

Questions raised by the Commission:

1. *Is there a role for the Electricity Commission in the public release of real time information and if so, which data, and for what reason?*

We agree that there is a role, and strongly support the release of the widest possible range of information as the electricity markets complex inter-relationships mean that an inability to access even relatively obscure data can lead to costly sub-optimal decisions. Most of what's proposed makes sense and is long overdue. We strongly agree with the view expressed in the paper that "*the majority (of data) is either partially available, completely unavailable, difficult to obtain or in difficult-to-use formats*"). Parallel release of the Metlab and FORTRAN data processing scripts, plus a search facility, is also a welcome move.

2. *Views on the proposed CDS...*
and
3. *Any additional factual and historical data sets...*

It would be helpful for the Commission to release some key parallel national and regional information in tandem with its proposed electricity information releases (GDP changes, population trends, etc). This could be done on a 'best estimate' basis for the moment. Also, all parties should be given regularly updated data on pending changes in supply and in loads (dates of any output or consumption changes at major generation stations and loads, links to data on developments in key industries and activities such as plantation tree maturities, regional irrigation, etc). If

necessary other agencies (Statistics NZ, etc) could be commissioned to extend their data series to meet specific Commission objectives.

The Commission should consider developing and publishing its own assessment of 'gas available for generation', looking ahead 5-10 years.

It would be especially valuable to have regional (and North & South Island) demand and generation data provided (say) monthly. Consumption by consumer groups (ideally regionally) would be very useful too, and a facility to have this fine-tuned via feedback from the industry would help. Data on peak loads (nationally and regionally, by months and also when defined levels are exceeded) would be desirable.

Data on the estimated remaining life of key electricity supply assets would be worth considering.

4. *Should any of the proposed data sets not be published...?*

ENA supports comprehensive disclosure, with publication or public access denied very rarely if at all, and only after consultation with all participants. This would place all parties on an equal footing and, especially in an industry dominated by state-owned enterprises, help limit the scope for special deals being done for political objectives or because of other priorities without other participants understanding the drivers involved and the implications for future investment decisions (the e3p gas underwriting decisions are an example). The longstanding practice of concealing the aluminium smelter load under 'non-ferrous metals' is annoying and confusing. Regional load figures by categories might solve this problem but it is time to see national figures that are less coy about such important demand components.

5. *Is the proposed timeframe appropriate?*

While the data set is being established the time frame seems reasonable. However, the Commission should consider a goal of maintaining dynamic information, especially on key issues, that updates regularly as data becomes available. The 6 monthly interval for hydrological data seems too lengthy, given the importance of this to the market.

6. *Format...*

Data should be provided in a format that can readily be uploaded into Excel files.

7. *Channels...*

The proposed channels seem appropriate.

Alan Jenkins
Chief Executive

