



Submission on the Proposed Part E Amendments

Paragraph or rule no.	Comments
Part A rule 1	This rule refers to the status code of “C” where it should refer to both L (load) and G (Generation). The status code “B” (both – Load and Generation) is correct it is the reference to “C” which is not a current code that is incorrect.
Part E rule 4.1	<p>An enhancement to this rule would be to state that the participant must have a valid use of system agreement (UoSA) with the distributor before requesting the distributor to create an ICP identifier.</p> <p>Arguably under rule 4.2 distributors can decline to create an ICP with reasons, enhancing rule 4.1 (as above) reminds traders of their obligations to have a valid UoSA for that network area before they begin to request ICP identifiers.</p>
Part E rule 10.1.2	This rule states that a distributor must have a further audit completed within 12 months of the initial audit. Powerco recommends that rather than selecting a date based on an initial audit, why not simply require all distributors have an audit by the 31 st of March each year (or some other month end date).
Part E rule 19.2	<p>The proposed rule change requires participants to advise the registry of any “errors” in the information provided under subclause 1. We believe that this rule adds a level of ambiguity to participants as it doesn’t define what sort of error should be reported to the registry. If say a distributor has the wrong address for an ICP identifier should this be reported? Or if a distributor has livened some ICP’s but they remained at a ready status on the registry, then is this an error that should be reported?</p> <p>Further clarification of what is considered an “error” is needed. For this reason we prefer the original wording of 19.2.</p>

Part E rule 25.4	<p>This rule provides a time frame for a report requested by a participant. We think this rule should be expanded to ensure that the participant is entitled to that report from the registry (i.e. it relates to their role) which was the sentiment in the old rule 25.2. Again we prefer the old wording as it makes this quite clear that participants are not entitled to all data on the registry.</p>
Part E Schedule E1 rule 1.2	<p>From the distributor audits it seems that many distributors have difficulty complying with this rule. Adding to this the “Address Guidelines” written by the Electricity Commission in 2002 are out of date and do not clarify how these fields in the registry should be populated.</p> <p>Powerco has noted that some distributors are putting non-address free text into the property address field to become technically compliant with the rules. Clearly this text doesn’t add anything to the ability to locate address, which is the reason for the rule. Therefore if the Commission allows distributors to circumvent the spirit of the rule in exchange for technical compliance, then address uniqueness is clearly not required.</p> <p>We suggest that this rule be changed to not require uniqueness but make uniqueness a recommendation in an updated version of the Address Guidelines.</p>
Part E Schedule E1 rule 2.1.12	<p>This rule requires the distributor to update the registry with details (type and capacity in kW) for any unmetered load. In the case of Powerco (and potentially many distributors) we are not aware of any unmetered load or changes to unmetered load at the ICP as the decision to have unmetered load (or not) is an issue which is determined by the end consumer and their retailer.</p> <p>The current rule states that should the distributor become aware of unmetered load then they must update the registry. However the potential rule change creates an obligation which will be impossible for distributors to fulfil. For this reason we prefer the current wording of “becomes aware”.</p>
Part E Schedule E1 rule 2.1.13	<p>This rule states that distributed unmetered load associated with the ICP must have the category “ENG”. We think here the Commission has confused the distributor maintained Unmetered Load Details field with the retailer “Daily Unmetered Load kWh registry field. We believe ENG is an engineering profile code which is populated by traders not distributors.</p> <p>Given that the wording of this rule is ambiguous we do not know what our obligation in relation to this rule means to us.</p>

<p>Part E Schedule E1 rule 4.6A</p>	<p>We commend the Commission for the inclusion of this rule which we think is a good mechanism for ensuring that ICP's are at the correct status. In this past we have raised issues like this with retailers and received little or no attention to the matter so it is good to see a focus in this area.</p> <p>While we support the proposed rule, we believe there should be a timeframe in which traders should have updated the information by. In addition, this rule should also cover instances where an ICP's moves from inactive to active.</p>
<p>Part E Schedule E1 rule 4.9</p>	<p>Powerco supports the requirement that ICP's in "New" or "Ready" statuses should not remain in that status for over 24 months.</p> <p>Practically however, on occasion in the case of multi-tenanted buildings ICP's may stay at a ready status for an excess of 24 months if the flat/unit has not been sold. To capture these instances we recommend the rule be re-worked to say "...calendar months, unless the distributor has confirmation from the proposed trader that that ICP should remain in that status".</p>
<p>Part E Schedule E1 rule 5.1 to 5.3</p>	<p>These rules are now confusing.</p> <p>The old rules 5.1 to 5.5 were in relation to creating and maintaining entries on the loss category Master Data table. I believe that the new rules 5.1 to 5.3 are also relating to the loss category master data table, but equally conceivably they could reflect the distributor's obligation to assign an ICP a loss factor code.</p> <p>We suggest the Commission clarifies its requirements and includes a reference to Master Data table.</p>
<p>Part E Schedule E1 rule 5.4</p>	<p>Powerco believes that the cost of implementing this rule far outweighs other solutions to the perceived problem. We believe that people responsible for data should take care to make sure that when opening files in Excel or Access that they read these fields as text not numbers.</p> <p>For Powerco where our loss factors already start with an alpha character changing this to an "L" adds no improvement as there is no issue with reading these fields as numbers. Changing our codes to an "L" will cost a considerable amount of money and time to modify our ICP database Gentrack, and our Customer Initiated Works System (CIW). In addition, we will need to modify our price book and our master data table; again neither modification is an insignificant amount of work.</p> <p>For this reason Powerco does not support the rule and thinks a better initiative would be for the Commissions to write a guideline to recommend distributors start their loss factor codes with an alpha character.</p>

<p>Part E Schedule E1 rule 6.1 to rule 6.3</p>	<p>These rules are now confusing.</p> <p>The old rule 6 related to updating the Price Category Master data whereas the proposed rule could be interpreted to read the distributors obligations in assigning a price category to an ICP identifier.</p> <p>We suggest the Commission clarifies its requirements and includes a reference to Master Data table.</p>
<p>Part E Schedule E1 rule 6.4</p>	<p>Powerco believes that the cost of implementing this rule far outweighs other solutions to the perceived problem. We believe that people responsible for data should take care to make sure that when opening files in Excel or Access that they read these fields as text not numbers.</p> <p>For Powerco our pricing category codes already start with an alpha character (V for Valley network area, T for Tauranga a network area and E for our GXP region) so there is no issue with software reading these fields as numbers.</p> <p>Changing these codes to a "P" will cost a considerable amount of money and time to modify both our ICP database Gentrack, and our Customer Initiated Works System (CIW). In addition, we will need to modify our price book and our master data table; again neither modification is an insignificant amount of work.</p> <p>Implementing this rule will therefore incur unnecessary cost for Powerco, and other distributors in the same position with no benefit. For this reason Powerco does not support the rule and thinks a better initiative would be for the Commissions to write a guideline to recommend distributors start their pricing category codes with an alpha character.</p>