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Maree McGregor  
Electricity Commission  
Level 7, ASB Bank Tower  
2 Hunter Street  
WELLINGTON

E-mail: [info@electricitycommission.govt.nz](mailto:info@electricitycommission.govt.nz)

Dear Maree,

Energy Online welcomes the opportunity to provide a submission to the Electricity Commission on the consultation paper "Use of Distributor Pricing Category Codes in the Registry" dated 23 June 2008. Energy Online has reviewed the consultation paper and responses to the specific consultation questions are attached as Appendix 1.

If you would like to discuss any of these matters further, please contact me on 09 539 4611.

Yours sincerely,

Mohsin Ali,  
Pricing Analyst  
Energy Online

## Appendix 1 – Responses to Consultation questions

(a)	Do you agree with the concept that the distributor price category code is a single code that represents a group of tariffs applicable to an ICP?	Energy Online agrees with the concept that the price category represents a group of tariffs applicable to an ICP.
(b)	Do you have another interpretation of the definition price category code that you would like to discuss? Please provide details of the option, benefits, etc.	<p>While Energy Online is comfortable with the existing interpretation, Energy Online would also welcome the alternate interpretation where the price category represents each individual tariff option. This would increase accuracy when quoting pricing to customers and loading tariffs into our customer database.</p> <p>However, for this field to be accurately populated, meter owners should provide meter installation details to the distributor on a regular basis (e.g. monthly, or for any meter change on a property).</p>
(c)	Does the document provide sufficient detail to standardise the application of the distributor price category code. Please give reasons for your answer and suggestions for improvements.	<p>The document assists standardisation by clearly defining 'price category' and 'tariff option'. This can be improved by suggesting that the reporting codes required by distributors exactly match the pricing category and tariff codes.</p> <p>Optimally, we would prefer all distributors to adopt a consistent way of allocating pricing categories. For example, all networks should have pricing categories for unmetered load, Domestic &lt;15 kVA, Commercial &lt; 15 kVA, Commercial 15 – 69 kVA etc. This would allow customers to compare prices between different regions easily and aid loading of customer accounts. However, we are aware the difficulties in achieving this due to regional and network variations in customer types and load management.</p>
(d)	Does the document cover all relevant details relating to the application of the distributor price category?	Yes, by demarcating the responsibilities of retailers and distributors.
(e)	Is the information provided within the switching files of sufficient detail to allocate distributor tariffs to an ICP? Please give reasons for your answer and suggestions for improvements.	Yes, as the information provided in the switching files contain meter registry and load information, which can be corroborated with the applicable price category code.
(f)	Should the guideline be extended to cover the other registry requirements that have an impact on the allocation of tariff options?	No, the guideline should not be extended to cover other registry requirements.