



TRANSPOWER

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Richard Fletcher
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15 April 2010

Submissions
Electricity Commission
PO Box 10041
WELLINGTON 6143

Dear Sir/Madam

Re: Further consultation: proposed amendments to parts E and J of the Rules and consequential amendments to parts A and H

This is Transpower New Zealand Limited's submission on the Electricity Commission's 23 March 2010 consultation paper *Further consultation: proposed amendments to parts E and J of the Rules and consequential amendments to parts A and H of the Rules*.

We have reviewed the proposed changes to parts E and J and, while it appears that Transpower will be largely unaffected by the changes, the proposal will change the manner in which the System Operator receives important operational information.

The System Operator currently relies on the provisions in part J of the Rules to receive information about when participants cease to trade at a point of connection; there is no mechanism in part G that provides for the System Operator to receive this information. Transpower understands that the new rule 24.1.2 in part E is intended to deliver the same information to the System Operator, as long as the System Operator requests the relevant information by way of a report.

The proposed rule 24.1.2 states:

*The **system operator** may at any time request, in writing, a report that sets out every switch made under clauses 1.1, 2.1, or 3.2 of schedule E2, the effect of which is that a **trader** has commenced trading at an **NSP** or a **trader** has ceased trading at an **NSP**.*

The System Operator must receive the right information in a usable format to enable it to keep its software up to date with respect to current trading arrangements. If this rule is to work as intended, that is, deliver the same information as is currently provided under part J, it is important the System Operator be involved in the construction of the report.

15 April 2010

Therefore, we request that the Electricity Commission contact Lisa Dhanji on
(04) 495 7460 or (021) 467 196 in the early stages of the development of the report
to obtain Transpower's input to the design.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R Fletcher', followed by a period.

Richard Fletcher
Regulatory Strategy Manager