



Ross Weenink
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2 November 2011

Submissions
Electricity Authority
PO Box 10041
WELLINGTON 6143

Dear Sir/Madam

Re: Part 10 Review – Proposed amendment to the Code

This is Transpower New Zealand Limited's submission as grid owner on the Authority's September 2011 consultation paper *Part 10 Review – Proposed amendment to the Code*. This submission comprises responses to the consultation questions and comments on particular proposed Code changes.

Responses to the consultation questions

Question No.	Question	Response
Q 1	Do you agree with the proposal to have an MEP as the participant responsible for the control of access and the compliance of a metering installation with the Code? What parts do you agree or disagree with?	Generally agree.
Q 2	Do you agree that the proposed changes will allow an MEP for a metering installation to function appropriately? What parts do you agree or disagree with?	Generally agree.
Q 3	Do you agree that the proposed changes will allow the Code obligations for provision of metering data and functionality to be met? What parts do you agree or disagree with?	Generally agree.

Question No.	Question	Response
Q 4	Are the proposed Code amendments regarding the treatment of privacy and security of metering data appropriate? What parts do you agree or disagree with?	Generally agree.
Q 5	Are the proposed changes to include audit provisions appropriate? What parts do you agree or disagree with?	Generally agree.
Q 6	Do you agree with the proposal to amend the registry metering records to include a lower level of information for interim certified metering installations? What parts do you agree or disagree with?	Generally agree.
Q 7	Do you agree with the clarification of which control devices in a metering installation require certification? What parts do you agree or disagree with?	No comment.
Q 8	Do you agree with the changes to the living procedures for a new point of connection? What parts do you agree or disagree with?	Disagree. See comments below.
Q 9	Do you agree with the changes to the certification processes requirements? What parts do you agree or disagree with?	Generally agree.
Q 10	Do you agree with the changes made within the proposed Part 10 for time frames? What parts do you agree or disagree with?	Generally agree. Part 10.41 (4) (c) should be extended to five business days.
Q 11	Do you agree with the changes to the proposed Code amendments to Parts 1, 11 and 15 as set out in Appendix 3, 4 and 5? Which parts do you agree or disagree with?	No comment.
Q 12	Do you agree with the broad design of the Part 10 proposal? Which parts do you agree or disagree with?	Generally agree.

Question No.	Question	Response
Q 13	Do you agree with the proposed changes to the revised Registry Functional Specification in Appendix 6? Which parts do you agree or disagree with?	No comment.
Q 14	Do you agree with the material contained in the regulatory statement? What parts do you agree or disagree with?	No comment.
Q 15	In particular, do you expect the Part 10 proposal to have a positive NPV? Please give reasons and alternative costs and benefits if you think there will not be a positive NPV.	No comment.

Comments on particular proposed Code changes

10.26 (9)

With regard to the requirement that the grid owner must notify the market administrator when error compensation processes are required at a metering installation, this notification should only be required where the error compensation is necessary to meet the accuracy requirements defined in table 1 of schedule 10.1. The notification should not be necessary where the grid owner chooses to improve the accuracy of an otherwise accurate installation.

We suggest adding the following:

The requirements in (a), (b) and (c) to provide relevant details to the market administrator do not apply where error compensation processes are applied to a metering installation that would otherwise meet the accuracy requirements defined in table 1 of schedule 10.1.

10.31 – Livening point of connection to the grid

Transpower strongly disagrees with subclauses (b) and (c) that prevent the livening of a point of connection to the grid without authorisation from the market administrator. The market administrator will not add any value to the commissioning process and may affect arrangements previously agreed with connecting parties. The codes already require the grid owner to provide one month's notice of changes to the grid to the reconciliation manager. The reconciliation manager is required to pass this information on to market participants. The existing notification process, along with the requirements in 10.26 is generally seen as sufficient for all parties to be aware of any new connection to the grid.

Schedule 10.1, Table1

The last column should be relabelled “Maximum inspection period”. It is unfair to impose a restriction on a participant who may want to perform inspection at a shorter interval.

Schedule 10.7, 31 – measuring transformer burdens and compensation requirements

Transpower believes that there are problems with this clause. Subclause (2) implies that there will only be changes to error compensation factors related to voltage transformers – this is not the case. We suggest that the specific reference to voltage transformer be changed to measurement transformer. This may be a drafting issue as subclauses (3) and (4) refer to measurement transformers.

Subclause (6) deals with an ATH’s ability to make minor changes to measurement transformer burdens without the metering equipment provider’s approval. This subclause is overly restrictive. There is no ability to make any change to a current transformer’s burden and the limits imposed on voltage transformer changes are too small. It is Transpower’s experience that minor burden changes within the measurement transformer’s rating have little impact on the overall accuracy of the metering installation. We suggest that the clause be written to allow burden changes to any type of measurement transformer provided the change is less than 5% of rated burden and the final burden will be less than 80% of the rating.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ross Weenink', with a stylized flourish at the end.

Ross Weenink
Acting Regulatory Strategy Manager