



26 September 2023

Electricity Authority  
Wellington  
New Zealand

Email: [distribution.feedback@ea.govt.nz](mailto:distribution.feedback@ea.govt.nz)

## Submission – Consultation on Minor changes to the Electricity Registry

### Introduction

1. Orion appreciates the opportunity to submit on the Consultation<sup>1</sup> seeking feedback on the Electricity Authority's (the Authority) review of the registry from industry stakeholders by 26 September 2023.
2. We note that there are 3 changes in this consultation<sup>2</sup>:
  - The Authority proposes to add three new entries to the 'fuel type' codes in the Description Table of SD-020 in the registry functional specification Section 5: Establishing a new advisory group and related changes to the advisory group charter and terms of reference
  - Secondly, as vehicle to grid installations (where an electric vehicle can supply power from its battery back to the network) are increasing in New Zealand, the Authority proposes an additional change to the fuel type codes
  - Lastly, the Authority would like to add a tool tip to the 'Property Name' entry in the registry, to ensure that this field is only completed when necessary and with the correct information.

---

<sup>1</sup> <https://www.ea.govt.nz/news/general-news/consultation-on-proposed-minor-changes-to-the-electricity-registry/>

<sup>2</sup> <https://www.ea.govt.nz/projects/all/registry-enhancements/consultation/minor-changes-to-the-registry/>

## Summary

3. We welcome and support the Authority proposal to update fuel type fields in the registry.
4. We do not support the proposed change to the "Property Name" field as it will reduce transparency of information to participants.

## Feedback on the consultation and proposed changes

5. Orion uses the "Property Name" field extensively and more specifically in the following instances:
  - every time Orion decommissions an ICP we put "decommissioned" in this field as another trigger to show that the network has had this ICP decommissioned.
  - We also use it to show the lot number for new ICP's in brand new subdivisions where the lot markers may be the only way to find the site until a street number is allocated by the local council.
  - If a site is a multi-building site we use this field to say which building the connection is in.
  - This field is also used to identify specific third party owned sites. They are labelled in this field with their asset number and description.

We are concerned that if the Authority decides to limit the use of this field that we would lose the ability to record this information in an alternative appropriate field on the registry. This would reduce transparency of information to participants.

## Other Feedback

6. In principle, Orion supports the Electricity Network's Association's submission.

## Concluding Remarks

Thank you for the opportunity to provide feedback. We do not consider any part of this feedback as confidential.

If you have any questions or queries or aspects of the submission which you would like to discuss, please contact me on 03 363 9898.

Yours sincerely

Rob Tweedie

**Regulatory Manager**