



TRANSPOWER

Transpower House, 96 The Terrace,

PO Box 1021, Wellington,

New Zealand

Telephone +64-4-590 7544

Facsimile: +64-4-495 7100

www.transpower.co.nz

Micky.cave@transpower.co.nz

DD 04 590 7309

30th April 2014

Fraser Clark
General Manager, Market Services
Electricity Authority
86 Customhouse Quay
Wellington

By email: submissions@ea.govt.nz

Dear Fraser

Information System Definition

We appreciate the opportunity to provide feedback on the document *Information System Definition* updated for March 2014. Our response is as grid owner and system operator with EMS as FTR manager making its own submission.

We give feedback where necessary to all the information in the document in table format at Appendix A. We have some specific comment about the information published under Part 12 clauses, following.

Clause 12.15

For the information identified as published under clause 12.15 (3) we are currently exempt from the requirement of sub clause (1) to provide transmission agreements to the Authority¹. We have been granted exemption because the Authority agreed with our alternative disclosure approach that we consider has greater information value for transmission customers. The result of this alternative approach is to make redundant the need for the Authority to publish the transmission agreements on its own site. Instead, the revised information is published by us at www.transpower.co.nz. We will be proposing to the Authority a Code Change for permanent effect of the alternative disclosure.

Clause 12.50

For the information published under clause 12.50 (3) about written agreements for connection to and/or use of the grid we note that the publishing requirement depends on prior Authority actions and the date of the contract (see clause 12.50 (1)). By presenting in the document only the specific sub-clause reference and publishing requirement it could raise an expectation to the reader that publication (in this case of 'connection agreements') was mandatory. We suggest for clarity the context for the publishing requirement is given.

Through this opportunity to review the publishing requirements under Part 12 we consider there is merit in continuing to review of the requirements under a 'fit for purpose' objective in light of our information disclosure regulation under Part 4 of the Commerce Act. We will be

¹ Exemption notice 194

in touch to advance this consideration. Meanwhile, please do not hesitate to contact me if you have any questions.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Micky Cave', with a stylized, cursive script.

Micky Cave
Senior Regulatory Analyst

Appendix A

First we query whether the title page that currently states “*This document following information for the purposes of the Electricity Industry Participation Code 2010*” needs amendment to improve meaning.

We provide feedback in the tables below on information in the document that we consider requires changing.

Table 1 Feedback on Part 3 Table 1

System	Description	Feedback
Asset Capability Information (ACI)	A Transpower database shared between system operator and grid owner.	This is needed as there is no relevant approved system that exists as a valid reference for Clause 13.35(1).

Table 2 Feedback on Part 5 Table 3

Clause	What is published	Our understanding of manner of publishing	Feedback
13.136 to 13.140	Transmission of the following information to the pricing manager and the grid owner by generators, embedded generators, and dispatchable load purchasers: - adjusted half-hour information for participants - half-hour metering information - notice of provision.	FTP or direct meter access SMTP	We have removed MOI and MDB because we consider the grid owner's obligation for publication is met through FTP.
13.141(1)(b)(iii)	Grid owner provides half-hour metering information to pricing manager.	FTP	We have removed MOI and MDB because we consider the grid owner's obligation for publication is met through FTP.
13.145	Grid owner publishes notice of any input information that is estimated.	SMTP Fax	Added Fax.

13.146(1)	Grid owner or system operator (whichever applies) provides revised data to the pricing manager.	MOI/MDB FTP	Added FTP.
13.147(2)(a)	Grid owner, generator, or dispatchable load purchaser publishes notice that revised data has been given to the pricing manager.	SMTP Fax	Added Fax.
13.155(a)	Grid owner, generator, or dispatchable load purchaser publishes notice when they give revised data to the pricing manager.	SMTP Fax	Added Fax.
13.157(1)	Grid owner gives revised data to pricing manager in an infeasibility situation	MOI/MDB FTP	Added FTP.
13.158	Grid owner publishes when it gives revised data to the pricing manager in an infeasibility situation.	SMTP Fax	Added Fax.
13.166(1)	Generator, grid owner, or dispatchable load purchaser gives pricing manager actual metering information, back-up metering information, check metering information or a final estimate.	TCP/IP MOI/MDB FTP or direct meter access	

Table 3 Feedback on Part 5 Table 7

Clause	What is published	Our understanding of manner of publishing	Feedback
Clause 12.15(3)	Authority publishes all transmission agreements between Transpower and designated transmission customers	www.ea.govt.nz www.transpower.co.nz	Publication requirement becomes redundant because of exemption (#194). We will also be submitting a Code change proposal to amend the publishing objective and requirement.
Clause 12.50 (3)	Authority publishes copies of grid connection agreements	A copy of any written agreement for connection to and/or use of the grid...entered into before 28 June 2007	Identify that the publishing requirement depends on both the Authority's request and the date of the contract

Table 4 Feedback on Appendix A Tables 3 and 8

Clause	What is published	Our understanding of manner of publishing	Feedback
8.43A(3)(b)	System operator publishes its decision on request from Authority or participant that system operator change its procurement plan	www.systemoperator.co.nz	
13.149(2)(a)	Pricing manager publishes notice of a provisional pricing situation (business day)	SMTP	Suggest for consistency that each clause has the approved system identified.
13.150(2)(a)	Pricing manager publishes notice of a provisional pricing situation (non-business day)	SMTP	
13.149(2)(b)	Pricing manager publishes provisional prices and provisional reserve prices (business day)	WITS	
13.150(2)(b)	Pricing manager publishes provisional prices and provisional reserve prices (non-business day)	WITS	
13.156(1)	Pricing manager publishes interim prices and interim reserves prices, and notice that an infeasibility situation or high spring washer situation exists.	WITS SMTP	WITS/SMTP implies either can be used when in fact both are used. WITS is used for publishing interim prices, SMTP is used for giving notice that an infeasibility of high spring washer situation exists. (Elsewhere in the Information System Definition document systems are listed vertically to imply 'AND').

Table 5 Feedback on Appendix B

Clause	What is published	Our understanding of manner of publishing	Feedback
13.29	Grid owners provide standing data to the system operator on the capability of the transmission system.	Standing data is provided via SMTP over TCP/IP or, where the grid owner is Transpower, via ACI	ACI should be added to the approved information systems to make consistent with Clause 13.35(1).
13.31	Grid owners provide standing data to the system operator on the capability of transformers.	Standing data is provided via SMTP over TCP/IP or, where the grid owner is Transpower, via ACI.	ACI should be added to the approved information systems to make consistent with clause 13.35(1).
13.32	Grid owner submits updates of standing data to the system operator.	Changes to standing data are communicated by voice communication or, where the grid owner is Transpower via ACI.	ACI should be added to the approved information systems to make consistent with clause 13.35(1).
13.33	Grid owners submit revised information to the system operator.	Changes to standing data are communicated by voice communication or, where the grid owner is Transpower via ACI.	ACI should be added to the approved information systems to make consistent with clause 13.35(1).
13.35(1)	All information required to be submitted by a grid owner under clauses 13.29 to 13.36 must be transmitted to the system operator through the electronic facility contained in the information system.	ACI	ACI should be added to the approved information systems as this is the means by which this information is electronically transferred.

13.5(1)	All reserve offers or cancellations of reserve offers submitted by an ancillary service agent under clause 13.37 to 13.54 must be submitted by an ancillary service agent under clauses 13.37 to 13.54 must be transmitted to the system operator through the electronic facility contained in the information system.	WITS	All reserve offers and cancellations are made via WITS.
13.119	Grid owners advise clearing manager of total load of the preceding year day for the day after auction.	WITS SMTP	