

# Memo

**To** Traders and metering equipment providers  
**From** Ron Beatty  
**Date** 6 August 2015  
**Subject** Switching amendments that come into effect on 9 October 2015  
**For your action**

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Please note that amendments to the switching process in Schedule 11.3 of the Electricity Industry Participation Code 2010 (Code) will come into effect on 9 October 2015.

These amendments may require a change to your organisation's systems or processes. Please pass this memo to the appropriate member(s) of your organisation to ensure that your processes and systems align with the Code after these Code amendments come into effect.

The amendments are the result of consultations carried out in December 2013 and January 2015.

The consultation papers and decision papers are located on the Authority's website at <http://www.ea.govt.nz/development/work-programme/retail/switch-re-engineering/>.

The Code amendments are on the Authority's website:

- [Electricity Industry Participation Code Amendment \(ICP Switching\) 2014](#)
- [Electricity Industry Participation Code Amendment \(ICP Switching\) 2015](#).

The decision paper for the 2015 Code amendment includes a track-changed copy of the relevant parts of the Code, which shows the changes made by both the 2014 Code amendment and the 2015 Code amendment. In summary, the changes that may affect your systems and processes are detailed below.

## **Amendment to switch read revision process where AMI information is available**

1. The Authority decided to amend the Code to require the losing retailer in an installation control point (ICP) switch, to use a switch event meter reading revision provided by the gaining trader, if:
  - (a) the gaining trader derives the revised switch event meter reading from AMI information
  - (b) the gaining trader provides the revised switch event meter reading within 5 business days of receiving notification from the registry of the switch completion. For clarity, after 5 business days, traders may still carry out a switch event read revision under clauses 6(1) and 12(1) of Schedule 11.3
2. **Status** – change to revision read process (RR):

File ref: HHR switch amendments  
907181-14

- (a) no change is necessary to registry or formats
- (b) traders should ensure that their processes align with the Code.

### **Submission type fields in the registry**

- 3. The Authority decided to amend registry functionality to ensure the necessary alignment of the submission type fields is automatically achieved at the time of a switch.
- 4. **Status** – change to registry functionality completed and in production.
  - (a) Traders should ensure that any subsequent changes made to profiles are aligned to the submission type fields.

### **Switch event meter reading**

- 5. The Authority considers that the timing of a switch event meter reading is an issue of understanding and decided to clarify the intent of clause 6 of Schedule 15.2 of the Code.
- 6. **Status** – Code amendment completed.
  - (a) Traders should review their processes to ensure that their processes align with the amended Code.

### **Multiple metering types on an ICP**

- 7. The Authority noted there may always be some ICPs that have both non half hour (NHH) and half hour (HHR) metering installations. While there are not a large number of these ICPs, the Code needs to be clear as to which switching process traders should follow. To clarify the requirements of the switching process if an ICP contains both NHH and HHR metering installations:
  - (a) traders must use the switch type of HH in the NT file
  - (b) traders must ensure the appropriate switch type of HH is used in the NT file and the gaining trader must provide cumulative readings in the CS switch completion file if the ICP contains meter channels with an “accumulator type” = “C” and “settlement indicator” = “Y”.
- 8. **Status** - Code amendment completed.
  - (a) The Authority will make a minor change to validation in the registry.
  - (b) Traders should review their processes to ensure that their processes align with the amended Code.

### **Final information**

- 9. The Authority has added a definition of the new term "switch event meter reading", which will clarify, for the purposes of Schedule 11.3 of the Code, which meter readings are required. The registry already requires meter readings for a register with an accumulator type of C and a settlement indicator of Y. The requirement in the registry functional specification has been placed into the Code. Traders must already be doing this or they would not be able to complete switches.
- 10. **Status** – Code amendment completed.

## Tenure of an ICP

11. The Authority amended the Code requirement for switch event meter readings to allow for an estimate to be used if a validated meter reading is not available and the losing trader has been recorded in the registry as being responsible for the ICP for a period of less than three months.
12. **Status** – Code amendment completed.
  - (a) This is a relaxation of Code requirements, traders may need to make process changes to their systems.
  - (b) Traders should review their processes to ensure that their processes align with the amended Code.

## Metering category

13. Meter installation type may be either NHH or HHR. Any communicating AMI HHR ICP switches use the TR and MI switch types. Once the Code amendments come into force, any other HHR sites that have category 3 to category 5 metering installations must use the gaining trader switching process (which is a manual process in most cases). Note that a non-communicating metering category 1 or 2 AMI meter that has been certified as HHR shows on the registry summary screen as an HHR meter, and will require the use of the TR or MI switch types as appropriate.
14. The Authority has amended the Code and registry functionality to allow any ICP with metering installations with a maximum metering category of 2 to follow the standard switch process (switch type of TR) or the switch move process (switch type of MI) as appropriate.
15. For clarity, any ICP must use the switch type of HH and follow the process set out in clauses 13 to 16 of Schedule 11.3 of the Code if the ICP:
  - (a) has a non-AMI HHR metering installation with a metering category of between 3 and 5, the metering installation and submission type are remaining HHR, and the AMI status is remaining "N"; or
  - (b) is being changed from a non-AMI NHH to a non-AMI HHR metering installation (of any category), and the submission type is changing from NHH to HHR; or
  - (c) is being changed from a non-AMI HHR to a NHH metering installation.
16. This is a change to overcome issues with the current switching process where it is difficult to identify the difference between a non-communicating AMI meter and a legacy HHR meter on the registry summary screen.
17. **Status** – Code amendment completed.
  - (a) Traders may need to change their systems or processes if their back office switching system validation prevents the use of "TR" or "MI" switch types on an ICP with a metering installation type of HHR.
  - (b) The registry will be modified to allow the use of "TR" or "MI" switch types on an ICP with a metering category of 2 or less, or metering category 9, regardless of the meter type.

18. The Authority is in the process of implementing the registry change in paragraph 17(b) and will notify participants when this change is ready to be tested in the test registry.

### **Back dated switches**

19. The Authority noted that the Code does not allow for switches to be backdated. The Authority considered that there are no electricity market problems evident with backdating HHR switching (now called Gaining trader switching) within limits, and has amended clause 14 of the Code to allow a backdate to:
- (a) a date in the same month as the gaining trader advises the registry of the expected event date; or
  - (b) a date in the 90 days before the date on which the gaining trader advises the registry of the expected event date provided that the losing trader and the gaining trader agree.
20. **Status** – Code amendment completed.
- (a) The Authority notes that most HHR switches are manual, and backdating is currently in use for various reasons.
  - (b) Traders should check that their processes align with the amended Code.

### **Obtaining final metering installation interrogation options**

21. If a metering installation is changed when an ICP trader switches, the losing trader must obtain an interrogation to complete invoicing, reconciliation and switching obligations.
22. The Authority has amended Schedule 11.3 of the Code to allow either the gaining trader to provide an interrogation to the losing trader, or the losing trader or metering equipment provider to obtain an interrogation themselves. However, this only applies when traders are using the gaining trader switch process under clauses 13 to 16, and the ICP is being de-energised or if metering equipment is being removed.
23. **Status** – Code amendment completed.
- (a) Traders and metering equipment providers should review their processes to ensure that their processes align with the Code.

### **Renaming the half hour switching process**

24. The Authority has renamed the HHR switching process as “Gaining trader switch process”, as this wording more accurately reflects the normal switching process.
25. **Status** – Code amendment completed.
- (a) Traders should review their processes to ensure that their processes align with the amended Code.
26. If you have any questions please send an email to [marketoperations@ea.govt.nz](mailto:marketoperations@ea.govt.nz).

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