Electricity Authority Compliance Survey 2012

October 2012



AUCKLAND • WELLINGTON • SYDNEY

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Background and methodology

1.1 Background

The Electricity Authority (the Authority) is an independent Crown entity responsible for regulating the New Zealand electricity market. Part of this responsibility is to develop and administer the Electricity Participation Industry Code (Code). This Code is what governs the New Zealand electricity market.

This study was commissioned to help the Authority understand how market participants, perceive, use and understand the Code. The first part of the research was a series of n=10 face-to-face interviews with some of the Authority's stakeholders. The findings helped inform an online survey which is the subject of this report.

1.2 Methodology

Fieldwork was conducted between 28 September and 17 October 2012. Five5 reminders to complete the survey were sent during this period to those who had not responded. The population of stakeholders¹ for the survey was n=154 and a total of n=70 completed responses were received. This represents a response rate of 45%. The margin of error for sample size of 70 for a 50% figure at the '95% confidence level' is \pm 11.7%.

¹ A database of n=169 respondents was supplied. However, once multiple entries and removed the actual population for the survey was n=154.



Executive summary

1.1 Overview

The Participation Code was generally seen as costly to apply and was not rated as either easy to understand or to apply. Only a minority regarded it as adding value to the electricity industry. Most did not know how to make a Code amendment. Given a choice between greater flexibility and more certainty for the Code views were more or less evenly divided. Industry workshops were regarded as the most effective way for raising awareness of the Code followed closely by guidelines on the Authority's website and individual advice from the Authority.

1.2 Awareness of the Act, Regulations and Code

There were moderate levels of awareness² of the Electricity Industry Act, Regulations and Code with between 50% and 68% aware of the Act, Code and Low Fixed Tariff Regulations for Domestic Users. Less than half (42%) were aware of the Enforcement Regulations.

1.3 Understanding of the Act, Regulations and Code

Declared understanding³ of the Act, Regulations and Code was somewhat lower than levels of awareness. Declared understanding ranged from 40% for the Enforcement Regulations to a high of 58% for the Participation Code.

1.4 Participation Code's ease of keeping up-to-date, understanding, value for money, ease to apply and having a low cost to apply

Only a small minority (29%) rated the Code well⁴ as easy to keep up-to-date with changes. Slightly fewer (24%) rated it well for being easy to understand and easy to apply (also 24%). While 37% rated it well for adding value to the industry only 21% rated it well for having a low cost to apply. In comparison, 37% rated it poorly for having a low cost to apply.

⁴ These attributes were rated on a 1-5 scale where 1 meat 'very good' and 5 'very poor'. Those who rated an attribute well are the aggregate of 1+2 ratings, those who rated them poorly are the aggregate of 4+5 ratings and '3' is the neutral rating.



² Awareness was measured on a 1-5 scale where 1 meant 'fully aware' and 5 'not at all aware'. Those who are described as aware are the aggregate of 1+2 and those unaware the aggregate of 4+5 with '3' being neutral.

³ Declared understanding was measured on a 1-5 scale where 1 meant 'fully understand' and 5 'do not understand at all'. Those who are described as understanding are the aggregate of 1+2 and those who do not understand are the aggregate of 4+5 with '3' being neutral.

1.5 Compliance costs

The Participation Code was also rated as carrying the most compliance cost. More than half (56%) rated compliance with this as high⁵. This was significantly more than those who rated the Act as costly to comply with (31%), the Low Fixed Tariff Regulations for Domestic Users (29%) and the Enforcement Regulations (27%).

1.6 Regulatory risk management profile

More than two-thirds (69%) have a risk management programme and almost one-third (29%) have a regulatory compliance manager. A quarter (26%) used a third party to carry out compliance obligations while half (51%) answered that regulatory compliance was part of the role of their staff, but did not have a regulatory compliance manager.

1.7 Code amendment proposals

More than half (59%) did not know how to make a Code amendment proposal.

1.8 Use of communication channels - raising awareness of the Code

Guidelines on the Electricity Authority's website was by far the most used channel for maintaining awareness of the Code with 79% having used this. This was followed by industry workshops (51%), the Compliance Update Link (39%), talking to an investigator service (36%) and holding an annual compliance conference (31%).

1.9 Effectiveness of communication channels

Industry workshops were rated as the most effective communication channel with 62% rating these as effective.⁶ This was followed by guidelines on the Authority's website (59%), talking to an investigator (51%) and responding to requests to do site visits (48%).

1.10 Awareness of the Ruling Panel's role

A large majority (76%) were aware of the role of the Rulings Panel.

1.11 How well the Code balances reliability of supply with competition and efficiency

Over one-third (39%) rated the Code as balanced⁷ compared with 14% who rated it as unbalanced and 47% who gave a neutral rating.

⁶ Channels were rated for their effectiveness on a 1-5 scale where 1 meant 'very effective' and 5 'not effective at all.' Those who rated a channel as effective were the aggregate of 1+2 ratings, those who rated a channel as ineffective gave a rating of 4+5 and a neutral rating was '3'.



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⁵ Compliance costs were rated on a 1-5 scale where 1 meant 'very high' and 5 'very low'. Those who rated compliance as high are the aggregate of 1+2 ratings and those who rated costs as low are the aggregate of 4+5 ratings with '3' the neutral number.

1.12 Flexibility and encouraging of innovation versus clarity and certainty of the Code

Opinions were more or less evenly divided on preferences over whether the Code should be flexible and encouraging of innovation but may be uncertain (35%)⁸ or certain and clear but may be inflexible (29%) with 37% choosing the neutral mid-point position.

⁸ Respondents gave a rating on a 1-5 scale where 1 meant 'flexible and encouraging of innovation but may be uncertain' and 5 meant 'certain and clear but may be inflexible'. The aggregate of 1+2 are those who preferred flexibility, the aggregate of 4+5 are those who preferred certainty and '3' is the neutral mid-point.



⁷ Balance was rated on a 1-5 scale where 1 meant 'very balanced' and 5 'not at all well balanced'. Those who rated the Code as balanced are the aggregate of 1+2 and those who rated it as unbalanced are the aggregate of 4+5. '3' is the neutral mid-point.

Main report

2.1 Awareness of the Act, Regulations and Code

There were moderate levels of awareness of the Electricity Industry Act, Regulations and Code. Half (50%) are aware of the Low Fixed Tariff Regulations for Domestic Users, 57% are aware of the Code. Less than half (42%) are aware of the Enforcement Regulations.

The highest levels of awareness across all four compliance areas were recorded for electricity traders (n=10), contracted Electricity Authority service providers (n=6) and those that purchased from the clearing manager (n=10). Their levels of awareness ranged between 67% and 100% across all four areas.

Awareness levels for retailers (n=15) ranged between 53%-87%, between 34%-66% for generators (n=21), between 43%-70% for distributors (n=30).

Awareness levels for metering equipment owners (n=16) were between 57%-87% and for ancillary service providers between 34%-67%.

The lowest levels of awareness were recorded for consumers directly connected to the grid with awareness levels ranging between 27%-36% across the four areas.

All (100%) Test House (n=7) were aware of the Code, but awareness for the other three areas was between 42%-43%.

All (100%) load aggregators (n=3) were aware of the Low Fixed Tariff Regulations for Domestic Consumers, but awareness for the other three areas was between 33%-67%.



AWARENESS OF ELECTRICITY INDUSTRY ACT

Using a 1-5 scale where 1 means 'I am fully aware' and 5 'I am not at all aware'; tick how aware you are of those parts of the Electricity Industry Act, the Electricity Industry (Enforcement) Regulations, the Electricity Industry Participation Code and the Electricity (Low Fixed Charge Tariff Option for Domestic Consumers) Regulations that apply to your business?

	1 - I am fully aware	2	Total Aware	3	4	5 - I am not at all aware	Total not aware	Not applicable
	%	%	%	%	%	%	%	%
Electricity Industry Participation Code	29	39	68	16	13	4	17	-
Electricity Industry Act	24	33	57	23	14	3	17	3
Electricity (Low Fixed Charge Tariff Option for Domestic Consumers) Regulations	27	23	50	11	10	10	20	19
Electricity Industry (Enforcement) Regulations	13	29	42	36	14	6	20	3

Base: All respondents, n=70



2.2 Understanding of the Act, Regulations and Code

Declared understanding of the Act, Regulations and Code was somewhat lower than levels of awareness. Declared understanding ranged from 40% for the Enforcement Regulations to a high of 58% for the Code for all respondents.

> The Act

Across all respondents declared understanding of the Act was 48%. It was highest among distributors (66%), retailers (60%), metering equipment owners (56%), electricity traders (50%) and purchasers from the clearing manager (50%).

Declared understanding was lowest among Test House (14%), generators (19%), consumers connected directly to the grid (27%), load aggregators (33%), contracted Electricity Authority service providers (33%) and ancillary service agents (34%).

The Enforcement Regulations

Across all respondents declared understanding of the Enforcement Regulations was 40%. It was highest among distributors (50%), retailers (47%), metering equipment owners (50%), electricity traders (50%) and purchasers from the clearing manager (50%).

Declared understanding was lowest among load aggregators (0%), Test House (14%), ancillary service agents (17%) generators (20%), consumers connected directly to the grid (27%) and contracted Electricity Authority service providers (33%).

The Participation Code

Across all respondents declared understanding of the Code was 58%. It was highest among Test House (86%), electricity traders (80%), purchasers from the clearing manager (80%), metering equipment owners (75%), retailers (70%), contracted Electricity Authority service providers (67%) and distributors (54%).

Declared understanding was lowest among load aggregators (0%), consumers connected directly to the grid (36%), generators (47%) and ancillary service agents (50%).

The low fixed charge tariff regulations for domestic consumers

Across all respondents declared understanding of the Low Fixed Tariff Regulation was 52%. It was highest among load aggregators (100%), retailers (87%), electricity traders (80%) distributors (70%), purchasers from the clearing manager (70%) and metering equipment owners (69%.

Declared understanding was lowest among consumers connected directly to the grid (18%), Test House (28%), generators (38%), ancillary service agents (50%) and contracted Electricity Authority service providers (50%).



UNDERSTANDING OF ELECTRICITY INDUSTRY ACT

Thinking of those in your business who work in areas impacted on by the following Act, Regulations and Code, using a 1-5 scale where 1 means 'they fully understand' and 5 'they do not understand at all'; tick how well you think they understand the Act, Regulations and Code that apply to your business?

	1 - They fully understand %	2 %	Total understand %	3 %	4 %	5 - They do not understand at all %	Total do not understand %	Not applicable %
Electricity Industry Participation Code	17	41	58	21	11	7	18	1
Electricity (Low Fixed Charge Tariff Option for Domestic Consumers) Regulations	29	23	52	11	9	6	15	23
Electricity Industry Act	14	34	48	26	14	7	21	4
Electricity Industry (Enforcement) Regulations	10	30	40	27	21	7	28	4

Base: All respondents, n=70



2.3 Participation Code - ease of keeping up-to-date, understanding, value for money, ease to apply and low cost to apply

Only a small minority (29%) rated it well as easy to keep up-to-date with changes to the participation code. Slightly fewer (24%) rated it well for being easy to understand and easy to apply (also 24%). While 37% rated it well for adding value to the industry only 21% rated it well for having a low cost to apply compared with 37% who rated it poorly for this attribute.

Ease of keeping up-to-date

Across all respondents 29% rated the Code well for being easy to keep up-to-date with changes. It was rated highest among Test House (57%), retailers (40%), purchasers from the clearing manager (40%), electricity traders (40%), ancillary service agents (33%) contracted Electricity Authority service providers (33%) and load aggregators (33%) who rated it well for that attribute.

It was rated lowest for this by consumers connected directly to the grid (9%), metering equipment owners (13%), distributors (17%) and generators (29%).

Ease of understanding

Across all respondents 24% rated the Code well for ease of understanding. It was rated highest among electricity traders (30%) and retailers (27%) who rated it well for that attribute.

It was rated lowest for this by load aggregators (0%), metering equipment owners (0%), consumers connected directly to the grid (9%), Test House (14%), ancillary service agents (17%) contracted Electricity Authority service providers (17%), generators (19%), purchasers from the clearing manager (20%) and distributors (23%).

Ease to apply

Across all respondents 24% rated the Code well for being easy to apply. It was rated highest among contracted Electricity Authority service providers (67%) and Test House (29%) and who rated it well for that attribute.

It was rated lowest for this by load aggregators (0%), ancillary service agents (0%), metering equipment owners (6%), consumers connected directly to the grid (9%), electricity traders (10%), retailers (13%), generators (19%), consumers connected directly to the grid (20%) and purchasers from the clearing manager (20%).

Adding value to the industry

Across all respondents 37% rated the Code well for adding value to the industry. It was rated highest among contracted Electricity Authority service providers (50%) and retailers (40%) who rated it well for that attribute.

It was rated lowest for this by Test House (14%), ancillary service agents (17%), metering equipment owners (19%), purchasers from the clearing manager (20%), consumers connected directly to the



grid (27%), generators (29%), electricity traders (30%), distributors (33%) and load aggregators (33%) who rated it well for that attribute.

Having a low cost to apply

Across all respondents 21% rated the Code well for having a low cost to apply. It was rated highest among load aggregators (33%) and generators (20%) who rated it well for that attribute.

It was rated lowest for this by ancillary service agents (0%), consumers connected directly to the grid (9%), electricity traders (10%), metering equipment owners (13%), Test House (14%), contracted Electricity Authority service providers (17%), retailers (20%) purchasers from the clearing manager (20%) and distributors (20%).



ELECTRICITY INDUSTRY PARTICIPATION CODE

Thinking about the Electricity Industry Participation Code and using a 1-5 scale where 1 means 'very good' and 5 means 'very poor', how would you rate it in terms of:

	1 - Very	2	Total	3	4	5 - Very	Total	Not
	good		good			poor	poor	applicable
	%	%	%	%	%	%	%	%
Adding value to the industry	3	34	37	41	7	7	14	7
Ease of keeping up-to-date with changes	-	29	29	37	17	10	27	7
Ease to apply	1	23	24	43	20	6	26	7
Ease of understanding	-	24	24	34	27	6	33	9
Having a low cost to apply	1	20	21	34	27	10	37	7

Base: All respondents, n=70



2.4 Compliance costs

The Participation Code was rated as carrying the most compliance cost. More than half (56%) rated compliance with this as high. This was significantly more than those who rated the Act as costly to comply with (31%), the Low Fixed Tariff Regulations for Domestic Users (29%) and the Enforcement Regulations (27%).

> The Act

Across all respondents 31% rated the cost of complying with the Act as high. The cost was rated higher by load aggregators (66%), ancillary service agents (50%), contracted Electricity Authority service providers (50%), distributors (47%), metering equipment owners (44%), consumers connected directly to the grid (36%) and retailers (33%).

The cost was rated lower by Test House (14%), generators (19%) and purchasers from the clearing manager (20%) and electricity traders (30%).

The Enforcement Regulations

Across all respondents 27% rated the cost of complying with the Enforcement Regulations as high. The cost was rated higher by distributors (37%), ancillary service agents (34%), load aggregators (33%), electricity traders (30%), generators (29%), and Test House (28%).

The cost was rated lower by contracted Electricity Authority service providers (17%), purchasers from the clearing manager (20%), metering equipment owners (26%) and retailers (26%) and consumers connected directly to the grid.

The Participation Code

Across all respondents 56% rated the cost of complying with the Participation Code as high. The cost was rated higher by load aggregators (100%), ancillary service agents (83%), electricity traders (80%), retailers (73%), metering equipment owners (69%), contracted Electricity Authority service providers (66%), distributors (60%), purchasers from clearing managers (60%) and Test House (58%).

The cost was rated lower by generators (52%) and consumers connected directly to the grid (55%).

Low Fixed Charge Tariff for Domestic Consumers Regulations

Across all respondents 29% rated the cost of complying with the Low Fixed Charge Tariff for Domestic Consumers Regulations as high. The cost was rated higher by electricity traders (60%), purchasers from the clearing manager (50%), retailers (40%), metering equipment owners (37%), contracted Electricity Authority service providers (34%), distributors (30%), and Test House (29%).

The cost was rated lower by load aggregators (0%), connected directly to the grid (9%), ancillary service agents (17%) and consumers generators (28%).



ELECTRICITY INDUSTRY PARTICIPATION CODE

Thinking about the Electricity Industry Participation Code and using a 1-5 scale where 1 means 'very good' and 5 means 'very poor', how would you rate it in terms of:

	1 - Very good %	2 %	Total good %	3 %	4 %	5 - Very poor %	Total poor %	Not applicable %
Adding value to the industry	3	34	37	41	7	7	14	7
Ease of keeping up-to- date with changes	-	29	29	37	17	10	27	7
Ease to apply	1	23	24	43	20	6	26	7
Ease of understanding	-	24	24	34	27	6	33	9
Having a low cost to apply	1	20	21	34	27	10	37	7

Base: All respondents, n=70

2.5 Regulatory risk management profile

More than two-thirds (69%) have a risk management programme and almost one-third (29%) have a regulatory compliance manager. A quarter (26%) used a third party to carry out compliance obligations while half (51%) answered that regulatory compliance was part of the role of their staff, but did not have a regulatory compliance manager.

REGULATORY RISK MANAGEMENT PROFILE	
Tick if any of the following apply to your company:	%
w. i	• •
We have a risk management programme	69
Regulatory compliance is part of the role of our staff, but we do not have a regulatory compliance	51
manager We have a regulatory compliance manager	20
We have a regulatory compliance manager	29
A third party carries out our compliance obligations	26
None of the above	1
Base: All respondents, n=70	
Note: Multiple responses	



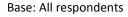
2.6 Code amendment proposals

More than half (59%) did not know how to make a Code amendment proposal and 41% answered that they knew.

Those with the highest declared levels of knowledge about making an amendment were ancillary service agents (83% knew), retailers (73%), electricity traders (70%), metering equipment owners (63%), purchasers from the clearing manager (60%), consumers connected directly to the grid (55%) and contracted Electricity Authority service providers (50%).

Those with the lowest levels of knowledge were load aggregators (33%), distributors (30%) generators (43%) and Test House (43%).

REGULATORY RISK MANAGEMENT PROFILE Do you know how to make a Code amendment proposal to suggest changes to the Code? Please tick which applies. Base Yes No (n) % ΑII 70 41 59 Ancillary service agent 6 83 17 Retailer 15 73 27 Electricity trader 10 70 30 Metering equipment owner 16 38 63 Purchaser from clearing manager 10 60 40 55 45 Consumer directly connected to the grid 11 Contracted EA service provider 6 50 50 Generator 21 43 57 Test house 7 43 57 Load aggregator 3 33 67 Distributor 30 30 70



Note: Due to small sample sizes, percentages are indicative.



2.7 Use of communication channels - raising awareness of the Code

Guidelines of the Electricity Authority's website is by far the most used channel for maintaining awareness of the Code with 79% saying they had used this. This was followed by industry workshops (51%), the Compliance Update Link (39%), talking to an investigator service (36%) and holding an annual compliance conference (31%).

Somewhat less used channels were facilitated settlements (16%), responding to requests to do site visits (17%) and placing case studies on the Authority's website (21%).

USE OF COMMUNICATION CHANNELS

The Authority uses a number of ways to try and ensure participants are aware of the Code. Please tick all that you have used.

	%
Guidelines on the Authority's website	79
Industry workshop	51
Compliance Update link	39
Talk to an investigator service	36
Holding a Compliance Conference each year	31
Placing case studies on the Authority's website	21
Responding to requests from participants to do site visits	17
Facilitated settlement	16
None of the above	10

Base: All respondents, n=70 Note: Multiple responses

2.8 Effectiveness of communication channels

Industry workshops were rated as the most effective communication channel with 62% rating these as effective. This was followed by guidelines on the Authority's website (59%), talking to an investigator (51%) and responding to requests to do site visits (48%).

Somewhat less effective were placing case studies on the Authority's website (44%), the Compliance Update Link (44%), holding an annual compliance conference (41%) and facilitated settlements (30%).



EFFECTIVENESS OF COMMUNICATION CHANNELS

Regardless of whether or not you have used it, tick how effective you think each is, using a 1 to 5 scale, where 1 means 'very effective', 5 'not effective at all'.

	1 - Very	2		2	1	5 - Not	Total not
	effective	2	Total effective %		7	effective at all	effective
	%	%	76	%	%	%	%
Industry workshop	21	41	62	26	9	3	12
Guidelines on the Authority's website	13	46	59	31	7	3	10
Talk to an investigator service	11	40	51	33	10	6	16
Responding to requests from participants to do	14	34	48	31	16	4	20
site visits	14	34	40	31	10	4	20
Placing case studies on the Authority's website	10	34	44	43	9	4	13
Compliance Update link	7	37	44	40	11	4	15
Holding a Compliance Conference each year	14	27	41	37	17	4	21
Facilitated settlement	3	27	30	47	17	6	23

Base: All respondents, n=70



2.9 Awareness of the Rulings Panel's role

A large majority (76%) are aware of the role of the Rulings Panel. Only two groups had lower levels of awareness than this. These were consumers directly connected to the grid (55%) and contracted Electricity Authority service providers (50%).

AWARENESS OF THE RULINGS PANEL'S ROLE									
Are you aware of the role of the Rulings Panel?									
	Base	Yes	No						
	(n)	%	%						
All	70	76	24						
Ancillary service agent	6	100	0						
Test house	7	100	0						
Load aggregator	3	100	0						
Electricity trader	10	100	0						
Metering equipment owner	16	94	6						
Retailer	15	93	7						
Generator	21	86	14						
Distributor	30	80	20						
Purchaser from clearing manager	10	80	20						
Consumer directly connected to the grid		55	45						
Contracted EA service provider	6	50	50						

2.10 How well the Code balances reliability of supply with competition and efficiency

Over one-third (39%) rate the Code as balanced compared with 14% who rated it as unbalanced and 47% who gave a neutral rating. Those who rated it more highly for being balanced were Test House (58%), purchasers from the clearing manager (50%), contracted Electricity Authority service provider (50%), electricity traders (50%), retailers (47%) and metering equipment owners (44%).

Those who rated it less highly for being balanced were load aggregators (33%), distributors (33%), generators (33%), ancillary service agents (33%) and consumers connected directly to the grid (36%).



HOW WELL THE CODE BALANCES RELIABILITY OF SUPPLY WITH COMPETITION AND EFFICIENCY

Using a 1-5 scale where 1 means 'very well balanced' and 5 means 'not at all well balanced', tick how well the Code balances the need for reliable supply by, competition in and efficient operation of, the electricity industry?

	Base (n)	1 - Very well balanced %	2 %	Total well balanced %	3 %	4	5 - Not at all well balanced %	Total not well balanced %
All	70	3	36	39	47	10	4	14
Test house	7	29	29	58	29	0	14	14
Purchaser from clearing manager		0	50	50	40	0	10	10
Contracted EA service provider	6	0	50	50	17	33	0	33
Electricity trader	10	0	50	50	40	0	10	10
Retailer	15	0	47	47	40	7	7	14
Metering equipment owner	16	6	38	44	38	13	6	19
Consumer directly connected to the grid	11	0	36	36	45	18	0	18
Generator	21	0	33	33	48	10	10	20
Distributor	30	0	33	33	47	17	3	20
Ancillary service agent	6	0	33	33	50	17	0	17
Load aggregator	3	0	33	33	33	33	0	33

Base: All respondents

Note: Due to small sample sizes, percentages are indicative.



2.11 Issues with the balance of the Code

Respondents that are neutral (47%) or negative (14%) on how well the Code balances reliability of supply with competition and efficiency were asked in what respect is the Code not well balanced and what improvements could be made to it. One of the main points raised from the responses is that the Code is complex and not easily understood.

Below are the verbatim responses from the question.

I am afraid I really do not know. We run a small hydropower station in ... and the best thing you could do is ignore this whole return.

1) Rule changes take a long time to implement by which time much of the incentive is lost 2) Rule changes seldom take into account the commercial impact on industry participants.

Could allow for a little more flexibility.

Far too much emphasis on market solutions. Customers received much better value for money with vertically integrated suppliers. Biased towards retailers. Even within a market approach the code is far too complex.

For a person who does not regularly need to check the Code, it is a very difficult document to search and understand. While one appreciates that there must be detail to cover all possibilities, a simplified guide encompassing some of the more crucial aspects would be very useful. Perhaps a review of breaches over the past few years might provide an insight as to what aspects of the Code that could do with a simplified guide. A guide could provide a basis for training for those in the industry who need to understand specific parts of the Code.

I believe there are two issues: 1. The three limbs act like a lens when the EA considers all issues in the electricity market. Often there is a preoccupation on how the issues and proposals will formally impact on these three limbs at the expense of working out a practical solution. 2. Competition appears to be emphasised at the expense of ensuring a reliable supply of electricity supply.

I believe we need to re-think how power is used, stored and paid for. At present the consumer is re-active, if the consumer was educated to budget power I believe there would be greater control of the network.

It is just a bit hard sometimes to recognise what benefits there are from some of the code requirements - rules for rules sake.

Inconsistency between rules for frequency and voltage. Where rules have changed for one, they haven't for another.

It assumes all retailers operate in the same manner and have similar risk appetites in all areas. Thus any new entrant retailers who are looking to carve out a niche have to set up their business similar to other retailers and thus lose whatever competitive edge they had. To improve there should be a sliding scale of compliance based on market size (and thus impact).



It has been industry ideologically based driven to create a profit as normal business applies and not linked to power savings.

It is not easily understood. Representative visits explaining relevance and application in our business might help.

More weight needs to be given to small scale generation that is distributed. Too much market power lies in the hands of line companies and large energy companies.

Part 13 needs to reflect thermal plant operation.

Participant resources vary widely and this may or may not facilitate innovation by participants to the benefit of the industry as a whole.

Places too much emphasis on retailer/market behaviour and very little recognition on the importance of distributors' ability to manage the networks.

Small generators do not have time, money or expertise.

The code appears overly influenced by the driver to promote competition amongst retailers to the detriment of other industry participants and this 'balance' has not resulted in a fair outcome across the industry. A good example is the recent changes to prudential security for distributors, solely for the benefit of retailers, and leading to a perverse market situation whereby distributors have to pay a retailer for effectively managing that retailers credit risk.

The Code does not address the problem of generation and retailing being dominated by state-owned companies.

The Code is focused more on achieving competitive outcomes while customers greatest concern is with reliability.

The question is far too involved to respond to in this type of forum. The sheer volume of the Code is of itself a threat to reliability as it makes it difficult to read and understand. Terminology is problematic where defined terms such as "energise" and "livening" have definitions that are different from their use in other legislation and their common usage in the industry this has safety as well as reliability issues. The inability of the Code to deal effectively with secondary networks leads to reliability issues. We are also concerned about the Codes impact on load management and AUFLS schemes particularly in light of proposed code changes that have the potential of undermining load management which will create reliability issues. We would note that at times it is areas where the Code has not been developed such as a local system operator role to co-ordinate at the distribution level that also has the ability to impact on reliability.

The score reflects I have doubts as to how well the Code balances these, with the earlier arguments regarding Use of System Agreement's supposedly being a barrier to competition being a case in point.

The specificity of the Code is such that each scenario needs to be worked through in the Code and the application of intent of the Code cannot be used for unforeseen situations.



There is a concern that some of the interventions focus too much on promoting retailer competition, as opposed to ensuring efficiency (e.g. distributor prudentials, consumer guarantees indemnity).

There is little to no dialogue to engage new entrants. It is assumed potential new entrants can navigate what is a relatively complex environment, understand the code and their obligations to it. Little assistance is offered in this respect other than to 'go with the flow'.

This question is unclear. What would a "well balanced" code look like? In terms of improvements that could be made, the Code is too long and there must be scope for rationalisation. Almost every code amendment involves making the Code longer. A process should be initiated to identify unnecessary Code requirements and remove them as they all create compliance and enforcement costs.

Total separation of Generation from Retail would assure a fair play for all Participants. Independent retailers are no match for Gen-tailers, who are 'naturally' hedged against wholesale price volatility. The original 'incumbency' of the Gentailers assured them sufficient customer base from which they could safely expand into other regions. They've had economies of scale before entering into the competitive market. A new independent retailer is totally disadvantaged, with no starting customer base, no natural hedge, and the full burden of all the compliance requirements. There is no room for true competition when Gen-tailers dominate the industry.

2.12 Flexibility and encouraging of innovation versus clarity and certainty of the Code

Opinions were more or less evenly divided on preferences over whether the Code should be flexible and encouraging of innovation but may be uncertain (35%) or certain and clear but may be inflexible (29%) with 37% choosing the neutral mid-point position.

Those more inclined toward flexibility were purchasers from the clearing manager (50%), metering equipment owners (44%) and generators (43%).

Those more inclined toward certainty were Test house (43%), purchasers from the clearing manager (40%) and consumers connected directly to the grid (36%).

Those more neutrally inclined were ancillary service agents (67%) and contracted Electricity Authority service providers (67%).



FLEXIBILITY AND ENCOURAGING OF INNOVATION VERSUS CLARITY AND CERTAINTY OF THE CODE

Using a 1-5 scale where 1 means 'flexible and encouraging of innovation but may be uncertain' and 5 means 'certain and clear but may be inflexible', tick what type of regulation you think the Code should be.

	Base (n)	1 - Flexible and encouraging of innovation but may be uncertain	2	Total 1 +2	3	4	5 - Certain and clear but may be inflexible	Total 4+5
	(11)	%	%	%	%	%	%	%
All	<i>70</i>	6	29	35	37	23	6	29
Purchaser from clearing manager	10	10	40	50	10	30	10	40
Metering equipment owner	16	13	31	44	38	19	0	19
Generator	21	14	29	43	38	19	0	19
Electricity trader	10	10	30	40	40	20	0	20
Retailer	15	7	27	34	40	27	0	27
Distributor	30	0	33	33	43	23	0	23
Ancillary service agent	6	0	33	33	67	0	0	0
Load aggregator	3	33	0	33	33	33	0	33
Test house	7	14	14	28	29	29	14	43
Consumer directly connected to the grid	11	0	18	18	45	18	18	36
Contracted EA service provider	6	0	0	0	67	33	0	33

Base: All respondents

Note: Due to small sample sizes, percentages are indicative.



Supplementary tables

		Electricity Industry Act (Using a 1-5 scale where 1 means 'l am fully aware' and 5 'l am not at all aware'; tick how aware you are of those parts of the Electricity Industry Act, the Electricity Industry (Enforcement) Regulations, the Electricity Industry Participation Code and the Electricity (Low Fixed Charge Tariff Option for Domestic Consumers) Regulations that apply to your business?									
		D	1 - I am fully	2	3		5 - I am not at all aware	Non-controlle			
		Base Count	aware Row N %	2 Row N %	Row N %	Row N %	Row N %	Not applicable Row N %			
All		70	24	33	23	14		3			
Type of business	Retailer	15	27	53	20	0	0	0			
	Generator	21	19	24	29	19	0	10			
	Distributor	30	33	37	17	10	0	3			
	Consumer directly	11	9	18	36	36	0	0			
	Purchaser from clearing	10	40	30	30	0	0	0			
	Contracted EA service	6	0	83	0	0	17	0			
	Metering equipment owner	16	25	44	25	0	0	6			
	Ancillary service agent	6	17	50	33	0	0	0			
	Test house	7	29	14	43	14	0	0			
	Load aggregator	3	0	67	33	0	0	0			
	Electricity trader	10	30	50	20	0	0	0			
	Other	1	0	0	0	100	0	0			
Number of employees	Up to 100	32	16	31	34	13	3	3			
	More than 100	38	32	34	13	16	3	3			

		aware'; tick l	Electricity Industry (Enforcement) Regulations (Using a 1-5 scale where 1 means 'I am fully aware' and 5 'I am not at all aware'; tick how aware you are of those parts of the Electricity Industry Act, the Electricity Industry (Enforcement) Regulations, the Electricity Industry Participation Code and the Electricity (Low Fixed Charge Tariff Option for Domestic Consumers) Regulations that apply to your business?							
			1 - I am fully			•	5 - I am not at			
		Base	aware	2	3	4	all aware	Not applicable		
		Count	Row N %	Row N %	Row N %	Row N %	Row N %	Row N %		
All		70	13	29	36	14	6	3		
Type of business	Retailer	15	33	20	33	7	7	0		
	Generator	21	10	24	29	24	5	10		
	Distributor	30	7	37	40	7	7	3		
	Consumer directly connected to the grid	11	0	27	36	36	0	0		
	Purchaser from clearing manager	10	40	30	20	10	0	0		
	Contracted EA service provider	6	17	50	0	0	33	0		
	Metering equipment owner	16	19	38	25	6	6	6		
	Ancillary service agent	6	17	17	50	0	17	0		
	Test house	7	29	14	43	14	0	0		
	Load aggregator	3	0	33	33	33	0	0		
	Electricity trader	10	40	30	20	10	0	0		
	Other	1	0	0	0	100	0	0		
Number of employees	Up to 100	32	13	19	47	16	3	3		
	More than 100	38	13	37	26	13	8	3		



		Electricity Indus	try Participation (Code (Using a 1-5:	scale where 1 mea	ans 'I am fully aw	are' and 5 'I am n	ot at all aware';
		tick how aware ye	ou are of those pa	arts of the Electric	ity Industry Act, the	e Electricity Indus	try (Enforcement)	Regulations, the
		Electricity Inc	dustry Participatio	n Code and the El	ectricity (Low Fixe	d Charge Tariff Op	tion for Domesti	Consumers)
				Regulations	that apply to you	r business?		
			1 - I am fully				5 - I am not at	
		Base	aware	2	3	4	all aware	Not applicable
		Count	Row N %	Row N %	Row N %	Row N %	Row N %	Row N %
All		70	29	39	16	13	4	
Type of business	Retailer	15	40	40	13	7	0	
•	Generator	21	33	33	10	24	0	
•	Distributor	30	27	43	17	10	3	
•	Consumer directly	11	9	27	36	27	0	
	connected to the grid							
	Purchaser from clearing	10	50	40	10	0	0	
	Contracted EA service	6	17	67	0	0	17	
	Metering equipment owner	16	31	56	13	0	0	
	Ancillary service agent	6	17	50	33	0	0	
	Test house	7	57	43	0	0	0	
	Load aggregator	3	0	67	0	33	0	
	Electricity trader	10	50	40	10	0	0	
	Other	1	0	0	0	100	0	
Number of employees	Up to 100	32	28	38	19	13	3	
	More than 100	38	29	39	13	13	5	

		Electricity (Low F	ixed Charge Tarif	f Option for Dome	stic Consumers) R	egulations (Using	g a 1-5 scale wher	e 1 means 'I am
		fully aware'	and 5 'I am not at	all aware'; tick ho	ow aware you are	of those parts of	the Electricity Ind	ustry Act, the
				Regulations, the				
			Charge Tariff Opti	on for Domestic C	onsumers) Regula	tions that apply	to your business?	
			1 - I am fully		1		5 - I am not at	
		Base	aware	2	3	4	all aware	Not applicable
		Count	Row N %	Row N %	Row N %	Row N %	Row N %	Row N %
All		70	27	23	11	10	10	19
Type of business	Retailer	15	47	40	7	0	0	
	Generator	21	19	24	10	19	10	1
	Distributor	30	27	30	17	10	10	
	Consumer directly connected to the grid	11	0	27	0	18	9	4
	Purchaser from clearing manager	10	50	30	0	0	10	1
	Contracted EA service	6	17	33	0	17	17	1
	Metering equipment owner	16	19	44	6	0	0	3
	Ancillary service agent	6	33	17	0	0	17	3
	Test house	7	29	14	14	0	0	4
	Load aggregator	3	0	100	0	0	0	
	Electricity trader	10	50	40	0	0	0	1
	Other	1	0	0	0	100	0	
Number of employees	Up to 100	32	38	19	13	9	3	1
	More than 100	38	18	26	11	11	16	12



		Regulations and	dustry Act (Thinki Code, using a 1-5 well you think th	scale where 1 me	ans 'they fully un	derstand' and 5 '1	they do not under	stand at all'; tick
		Base	1 - They fully understand	2	3	4	5 - They do not understand at all	Not applicable
	1	Count	Row N %	Row N %	Row N %	Row N %	Row N %	Row N %
All		70	14	34	26	14	7	4
Type of business	Retailer	15	7	53	33	7	C	0
	Generator	21	5	14	38			10
	Distributor	30	23	43	20	10	3	0
	Consumer directly	11	18	9	45	18	g	0
	Purchaser from clearing manager	10	0	50	40	10	C	0
	Contracted EA service provider	6	0	33	50	0	17	0
	Metering equipment owner	16	25	31	31	13	(0
	Ancillary service agent	6	17	17	50	17	C	0
	Test house	7	0	14	43	29	C	14
	Load aggregator	3	33	0	33	33	C	0
	Electricity trader	10	10	50	30	10	C	0
	Other	1	0	0	100	0	C	0
Number of employees	Up to 100	32	16	41	16	16	6	6
· · ·	More than 100	38	13	29	34	13	8	3

		Electricity Indust	ry (Enforcement)	Regulations (Thin	king of those in yo	our business who	work in areas im	pacted on by the
		following Ad	t, Regulations an	d Code, using a 1-	5 scale where 1 m	eans 'they fully u	nderstand' and 5	'they do not
		understand at a	II'; tick how well	you think they und	derstand the Act, F	Regulations and C	Code that apply to	your business?
			1 - They fully				5 - They do not understand at	
		Base	understand	2	3	4	all	Not applicable
		Count	Row N %	Row N %	Row N %	Row N %	Row N %	Row N %
All		70	10	30	27	21	7	4
Type of business	Retailer	15	20	27	27	27	0	0
	Generator	21	10	10	14	48	10	10
	Distributor	30	13	37	30	17	3	0
	Consumer directly	11	0	27	45	18	9	0
	connected to the grid Purchaser from clearing manager	10	20	30	20	30	0	0
	Contracted EA service provider	6	0	33	50	0	17	0
	Metering equipment owner	16	19	31	31	19	0	0
	Ancillary service agent	6	0	17	50	33	0	0
	Test house	7	0	14	29	43	0	14
	Load aggregator	3	0	0	33	67	0	0
	Electricity trader	10	30	20	20	30	0	0
	Other	1	0	0	100	0	0	0
Number of employees	Up to 100	32	13	34	16	25	6	6
	More than 100	38	8	26	37	18	8	3



		following Ad	dustry Participations and II'; tick how well	d Code, using a 1-	5 scale where 1 m	eans 'they fully u	nderstand' and 5	'they do not
		Base Count	1 - They fully understand Row N %	2 Row N %	3 Row N %	4 Row N %	5 - They do not understand at all Row N %	Not applicable
AII		70	17	41	21	11	7	1
Type of business	Retailer	15	27	53	13	7	0	0
	Generator	21	14	33	14	24	10	5
	Distributor	30	17	37	30	10	7	0
	Consumer directly	11	9	27	36	27	0	0
	Purchaser from clearing manager	10	30	50	20	0	0	0
	Contracted EA service provider	6	0	67	17	0	17	0
	Metering equipment owner	16	25	50	19	6	0	0
	Ancillary service agent	6	17	50	33	0	0	0
	Test house	7	14	86	0	0	0	0
	Load aggregator	3	0	0	67	33	0	0
	Electricity trader	10	30	50	20	0	0	0
	Other	1	0	0	100	0	0	0
Number of employees	Up to 100	32	19	41	19	9	9	3
	More than 100	38	16	42	24	13	5	0

		work in areas	Electricity (Low Fixed Charge Tariff Option for Domestic Consumers) Regulations (Thinking of those in your business who work in areas impacted on by the following Act, Regulations and Code, using a 1-5 scale where 1 means 'they fully understand' and 5 'they do not understand at all'; tick how well you think they understand the Act, Regulations and Code that apply to your business?							
		Base	1 - They fully understand	2	3	4	5 - They do not understand at all	Not applicable		
		Count	Row N %	Row N %	Row N %	Row N %	Row N %	Row N %		
AII	•	70		23	11	9	6	23		
Type of business	Retailer	15	47	40	7	0	0	7		
	Generator	21	19	19	14	19	0	29		
	Distributor	30	40	30	10	10	7	3		
	Consumer directly	11	9	9	18	18	0	45		
	Purchaser from clearing manager	10	40	30	20	0	0	10		
	Contracted EA service	6	17	33	0	17	17	17		
	Metering equipment owner	16	31	38	6	0	0	25		
	Ancillary service agent	6	33	17	0	0	0	50		
	Test house	7	14	14	14	0	0	57		
	Load aggregator	3	33	67	0	0	0	0		
	Electricity trader	10	50	30	10	0	0	10		
	Other	1	0	0	100	0	0	0		
Number of employees	Up to 100	32	38	25	9	9	0	19		
	More than 100	38	21	21	13	8	11	26		



		Ease of keeping		hanges (Thinking a very good' and 5 m				using a 1-5 scale
		Base	1 - Very good	2	3	4	5 - Very poor	Not applicable
		Count	Row N %	Row N %	Row N %	Row N %	Row N %	Row N %
All		70	0	29	37	17	10	7
Type of business	Retailer	15	0	40	33	20	7	C
	Generator	21	0	29	33	19	10	10
	Distributor	30	0	17	50	23	10	C
c	Consumer directly connected to the grid	11	0	9	45	18	9	18
	Purchaser from clearing manager	10	0	40	40	20	0	C
	Contracted EA service provider	6	0	33	33	17	0	17
	Metering equipment owner	16	0	13	44	25	19	C
	Ancillary service agent	6	0	33	50	17	0	C
	Test house	7	0	57	0	0	43	C
	Load aggregator	3	0	33	33	0	33	C
	Electricity trader	10	0	40	40	10	10	C
	Other	1	0	0	0	0	0	100
Number of employees	Up to 100	32	0	28	41	19	6	6
	More than 100	38	0	29	34	16	13	8

		Ease of underst		about the Electric d' and 5 means 've				where 1 means
		Base	1 - Very good	2	3	4	5 - Very poor	Not applicable
		Count	Row N %	Row N %	Row N %	Row N %	Row N %	Row N %
All		70	0	24	34	27	6	9
Type of business	Retailer	15	0	27	40	27	7	0
	Generator	21	0	19	29	38	5	10
	Distributor	30	0	23	33	37	7	0
	Consumer directly connected to the grid	11	0	9	27	27	9	27
	Purchaser from clearing manager	10	0	20	50	30	0	0
	Contracted EA service provider	6	0	17	50	17	0	17
	Metering equipment owner	16	0	0	50	38	13	0
	Ancillary service agent	6	0	17	50	33	0	0
	Test house	7	0	14	29	43	14	0
	Load aggregator	3	0	0	33	33	33	0
	Electricity trader	10	0	30	50	10	10	0
	Other	1	0	0	0	0	0	100
Number of employees	Up to 100	32	0	31	38	25	0	6
	More than 100	38	0	18	32	29	11	11



		Ease to apply (Th			y Participation Co or', how would yo			neans 'very good'
		Base	1 - Very good	2	3	4	5 - Very poor	Not applicable
		Count	Row N %	Row N %	Row N %	Row N %	Row N %	Row N %
All		70	1	23	43	20	6	7
Type of business	Retailer	15	0	13	60	20	7	0
	Generator	21	0	19	43	24	5	10
	Distributor	30	3	20	43	27	7	0
	Consumer directly	11	0	9	55	9	9	18
	connected to the grid							
	Purchaser from clearing	10	0	20	60	20	C	0
	manager Contracted EA service provider	6	0	67	0	17	C	17
	Metering equipment owner	16	0	6	50	31	13	0
	Ancillary service agent	6	0	0	67	33	C	0
	Test house	7	0	29	0	57	14	. 0
	Load aggregator	3	0	0	67	0	33	0
	Electricity trader	10	0	10	60	20	10	0
	Other	1	0	0	0	0	C	100
Number of employees	Up to 100	32	3	28	38	25	C	6
	More than 100	38	0	18	47	16	11	. 8

		Adding value to			lectricity Industry s 'very poor', how			scale where 1
		Base	1 - Very good	2	3	4	5 - Very poor	Not applicable
		Count	Row N %	Row N %	Row N %	Row N %	Row N %	Row N %
All		70	3	34	41	7	7	7
Type of business	Retailer	15	7	33	33	7	20	0
	Generator	21	0	29	43	10	10	10
	Distributor	30	0	33	47	13	7	0
	Consumer directly	11	0	27	55	0	0	18
	Purchaser from clearing manager	10	0	20	60	10	10	0
	Contracted EA service	6	0	50	17	0	17	17
	Metering equipment owner	16	0	19	50	13	19	0
	Ancillary service agent	6	0	17	50	17	17	0
	Test house	7	14	14	43	14	14	0
	Load aggregator	3	0	33	33	0	33	0
	Electricity trader	10	0	30	40	10	20	0
	Other	1	0	0	0	0	0	100
Number of employees	Up to 100	32	3	34	50	3	3	6
	More than 100	38	3	34	34	11	11	8



		Having a low		-	ectricity Industry F s 'very poor', how		-	scale where 1
		Base	1 - Very good	2	3	4	5 - Very poor	Not applicable
		Count	Row N %	Row N %	Row N %	Row N %	Row N %	Row N %
All		70	1	20	34	27	10	7
Type of business	Retailer	15	0	20	40	20	20	0
	Generator	21	0	24	33	19	14	10
	Distributor	30	3	17	37	33	10	0
	Consumer directly	11	0	9	27	36	9	18
	Purchaser from clearing manager	10	0	20	30	30	20	0
	Contracted EA service provider	6	0	17	50	17	0	17
	Metering equipment owner	16	0	13	31	31	25	0
	Ancillary service agent	6	0	0	50	50	0	0
	Test house	7	0	14	14	57	14	0
	Load aggregator	3	0	33	0	0	67	0
	Electricity trader	10	0	10	40	20	30	0
	Other	1	0	0	0	0	0	100
Number of employees	Up to 100	32	3	25	38	25	3	6
	More than 100	38	0	16	32	29	16	8

			Tick if a	any of the followin	ng apply to your co	mpanv:	
			We have a risk management programme (Tick if any of the	We have a regulatory compliance manager (Tick if any of the following apply	A third party carries out our compliance obligations (Tick if any of the following	Regulatory compliance is part of the role of our staff, but we do not have a regulatory compliance manager (Tick if any of the following apply	
			to your	to your	apply to your	to your	None of the
		Base	company:)	company:)	company:)	company:)	above
		Count	Row N %	Row N %	Row N %	Row N %	Row N %
All		7	0 69	29	26	51	1
Type of business	Retailer	1	5 73	20	13	73	0
	Generator	2	1 71	24	24	67	0
	Distributor	3	0 77	30	37	47	0
	Consumer directly connected to the grid	1	1 82	36	36	36	0
	Purchaser from clearing	1	80	10	10	80	0
	Contracted EA service		6 83	33	33	50	0
	Metering equipment owner	1	5 88	50	6	50	0
	Ancillary service agent		5 100	50	17	33	0
	Test house		7 57	43	0	57	0
	Load aggregator		3 100	33	33	67	0
	Electricity trader	1	90	20	10	70	0
	Other		1 0	0	0	100	0
Number of employees	Up to 100	3	2 63	16	38	66	0
	More than 100	3	8 74	39	16	39	3



		Electricity Indu			neans 'very high' a ollowing Act, Code			rate the cost of
		Base	1 - Very high	2	3	4	5 - Very low	Not applicable
		Count	Row N %	Row N %	Row N %	Row N %	Row N %	Row N %
All		70	11	20	43	4	13	9
Type of business	Retailer	15	13	20	60	0	7	0
	Generator	21	5	14	48	10	19	5
	Distributor	30	17	30	43	7	3	0
	Consumer directly connected to the grid	11	18	18	36	9	9	9
•	Purchaser from clearing manager	10	0	20	60	0	20	0
•	Contracted EA service provider	6	17	33	0	0	17	33
•	Metering equipment owner	16	25	19	50	0	6	0
	Ancillary service agent	6	17	33	50	0	0	0
	Test house	7	14	0	43	0	14	29
	Load aggregator	3	33	33	33	0	0	0
	Electricity trader	10	20	10	60	0	10	0
	Other	1	0	0	0	0	100	0
Number of employees	Up to 100	32	9	25	38	6	13	9
	More than 100	38	13	16	47	3	13	8

		Electricity Industr			g a 1-5 scale where with the followin			w', tick how much
			you rate the	cost of complying	with the followin	g Act, code and Ki	eguiations:)	
		Base	1 - Very high	2	3	4	5 - Very low	Not applicable
		Count	Row N %	Row N %	Row N %	Row N %	Row N %	Row N %
All		70	7	20	44	7	10	11
Type of business	Retailer	15	13	13	60	13	0	C
	Generator	21	10	19	43	10	14	5
	Distributor	30	7	30	43	7	10	3
	Consumer directly	11	9	18	55	0	0	18
	Purchaser from clearing manager	10	0	20	60	10	10	C
	Contracted EA service provider	6	17	0	17	33	0	33
	Metering equipment owner	16	13	13	63	13	0	C
	Ancillary service agent	6	17	17	33	33	0	C
	Test house	7	14	14	14	29	0	29
	Load aggregator	3	0	33	67	0	0	C
	Electricity trader	10	20	10	60	10	0	C
	Other	1	0	0	0	0	0	100
Number of employees	Up to 100	32	9	19	44	6	13	9
	More than 100	38	5	21	45	8	8	13



		Electricity Industr		de (Using a 1-5 sc of complying with				ow much you rate
		Base	1 - Very high	2	3	4	5 - Very low	Not applicable
		Count	Row N %	Row N %	Row N %	Row N %	Row N %	Row N %
AII		70	13	43	27	4	6	7
Type of business	Retailer	15	33	40	20	7	0	0
	Generator	21	19	33	29	5	14	0
	Distributor	30	10	50	33	3	0	3
	Consumer directly	11	0	55	27	0	0	18
•	Purchaser from clearing manager	10	30	30	30	0	10	0
•	Contracted EA service provider	6	33	33	0	0	0	33
	Metering equipment owner	16	38	31	31	0	0	0
	Ancillary service agent	6	33	50	17	0	0	0
•	Test house	7	29	29	43	0	0	0
	Load aggregator	3	33	67	0	0	0	0
	Electricity trader	10	40	40	20	0	0	0
	Other	1	0	0	0	0	0	100
Number of employees	Up to 100	32	13	41	28	6	9	3
	More than 100	38	13	45	26	3	3	11

					estic Consumers) F cost of complying			
		Base	1 - Very high	2	3	4	5 - Very low	Not applicable
		Count	Row N %	Row N %	Row N %	Row N %	Row N %	Row N %
All		70	13	16	19	11	9	33
Type of business	Retailer	15	33	7	27	27	0	7
	Generator	21	14	24	19	10	10	24
	Distributor	30	13	27	20	17	3	20
	Consumer directly	11	0	9	18	0	0	73
	Purchaser from clearing manager	10	30	20	30	0	10	10
	Contracted EA service	6	17	17	0	17	17	33
	Metering equipment owner	16	31	6	19	13	0	31
	Ancillary service agent	6	17	0	0	33	0	50
	Test house	7	29	0	0	0	14	57
	Load aggregator	3	0	0	33	33	0	33
	Electricity trader	10	50	10	20	10	0	10
	Other	1	0	0	0	0	0	100
Number of employees	Up to 100	32	19	16	19	16	9	22
	More than 100	38	8	16	18	8	8	42



		proposal to sugg	ow to make a Code est changes to the ck which applies.	e Code? Please
		Base	Yes	No
		Count	Row N %	Row N %
All		70	41	59
Type of business	Retailer	15	73	27
	Generator	21	43	57
	Distributor	30	30	70
	Consumer directly connected to the grid	11	55	45
	Purchaser from clearing manager	10	60	40
	Contracted EA service	6	50	50
	Metering equipment owner	16	63	38
	Ancillary service agent	6	83	17
	Test house	7	43	57
•	Load aggregator	3	33	67
	Electricity trader	10	70	30
	Other	1	100	0
Number of employees	Up to 100	32	28	72
	More than 100	38	53	47



			The Authorite		fa.s to tax and a		to and according of the	a Cada Diagas tia	le all that you hav	d	
			Ine Authoriti	y uses a number o T	t ways to try and e	nsure participan	ts are aware of th	e Code. Please tid	k ali that you hav	e usea.	
				Holding a	Placing case	Responding to					
			Guidelines on	Compliance	studies on the	requests from				Talk to an	
			the Authority's	Conference each		participants to	Compliance	Facilitated	Industry	investigator	
			website (The	year (The	website (The	do site visits	Update link	settlement (The	· ·	service (The	
			,	Authority uses a	,	(The Authority	(The Authority	•	Authority uses a	,	
			number of ways	· · · · · · · · · · · · · · · · · · ·	,	uses a number	uses a number		number of ways	number of ways	
			to try and	to try and	to try and	of ways to try	of ways to try	to try and	to try and	to try and	
			ensure	ensure	ensure	and ensure	and ensure	ensure	ensure	ensure	
			participants are	participants are	participants are	participants are	participants are	participants are	participants are	participants are	
			aware of the	aware of the	aware of the	aware of the	aware of the	aware of the	aware of the	aware of the	
			Code. Please	Code. Please	Code. Please	Code. Please	Code. Please	Code. Please	Code. Please	Code. Please	1
			tick all that you	tick all that you	tick all that you	tick all that you	tick all that you	tick all that you	tick all that you	tick all that you	None of
		Base	have used.)	have used.)	have used.)	have used.)	have used.)	have used.)	have used.)	have used.)	the above
		Count	Row N %	Row N %	Row N %	Row N %	Row N %	Row N %	Row N %	Row N %	Row N %
All		70	79	31	21	17	39	16	51	. 36	10
Type of business	Retailer	15	100	40	40	20	47	27	67	27	0
	Generator	21	76	43	29	10	43	14	52	43	14
	Distributor	30	90	30	20	27	43	13	63	37	3
	Consumer directly	11	73	36	27	0	27	9	18	55	9
	connected to the grid										
	Purchaser from clearing	10	90	40	50	10	60	30	60	40	, O
	manager										
•	Contracted EA service	6	67	17	17	17	33	33	33	17	17
	provider										
·	Metering equipment owner	16	94	50	50	38	56	25	75	38	0
	Ancillary service agent	6	100	67	50	50	67	33	83	33	0
	Test house	7	71	43			57	14			
	Load aggregator	3	100			0	67	33			
	Electricity trader	10				10		40			_
	Other	1	100		0	0	0	0	100		0
Number of employees	Up to 100	32			19	16	44	9	59	<u> </u>	13
	More than 100	38						21			



			e Authority's webs ach is, using a 1 to				
		Base	1 - Very effective	2	3	4	5 - Not effective at all
		Count	Row N %	Row N %	Row N %	Row N %	Row N %
All		70	13	46	31	7	3
Type of business	Retailer	15	7	67	20	0	7
	Generator	21	5	52	33	5	5
	Distributor	30	17	37	43	0	3
	Consumer directly connected to the grid	11	27	27	36	9	0
	Purchaser from clearing manager	10	0	70	20	10	0
	Contracted EA service provider	6	0	67	33	0	0
	Metering equipment owner	16	0	56	38	0	6
	Ancillary service agent	6	0	67	33	0	0
	Test house	7	0	43	14	29	14
	Load aggregator	3	0	67	33	0	0
	Electricity trader	10	0	70	20	0	10
	Other	1	0	100	0	0	0
Number of employees	Up to 100	32	13	59	22	6	0
	More than 100	38	13	34	39	8	5

			oliance Conference			•	
		errective you til	ilik eacii is, usilig	a 1 to 3 scare, will	ere i means very	enective, 3 not e	5 - Not effective
		Base	1 - Very effective	2	3	4	atall
		Count	Row N %	Row N %	Row N %	Row N %	Row N %
All		70	14	27	37	17	4
Type of business	Retailer	15	33	20	33	7	7
	Generator	21	24	29	33	10	5
	Distributor	30	10	33	30	20	7
	Consumer directly connected to the grid	11	0	55	36	9	0
	Purchaser from clearing manager	10	20	30	40	10	0
	Contracted EA service	6	0	17	33	50	0
	Metering equipment owner	16	13	25	38	19	6
	Ancillary service agent	6	17	17	50	17	0
	Test house	7	14	43	29	0	14
	Load aggregator	3	33	67	0	0	0
	Electricity trader	10	20	20	50	0	10
	Other	1	0	0	100	0	0
Number of employees	Up to 100	32	13	31	38	19	0
	More than 100	38	16	24	37	16	8



			lies on the Author				
		Base	1 - Very effective	2	3	4	5 - Not effective at all
		Count	Row N %	Row N %	Row N %	Row N %	Row N %
All		70	10	34	43	9	4
Type of business	Retailer	15	20	27	33	13	7
	Generator	21	14	48	24	10	5
	Distributor	30	3	40	50	3	3
	Consumer directly connected to the grid	11	18	27	45	9	0
	Purchaser from clearing manager	10	20	30	40	10	0
-	Contracted EA service	6	0	17	67	17	0
	Metering equipment owner	16	13	44	31	6	6
	Ancillary service agent	6	33	50	0	17	0
	Test house	7	14	29	43	0	14
	Load aggregator	3	0	67	33	0	0
	Electricity trader	10	30	30	20	10	10
	Other	1	0	0	100	0	0
Number of employees	Up to 100	32	6	41	47	6	0
	More than 100	38	13	29	39	11	8

		Responding to re	quests from parti	cipants to do site	visits (Regardles	s of whether or no	ot you have used
		it, tick how e	ffective you think	each is, using a 1	to 5 scale, where	1 means 'very effe	ective', 5 'not
				e f f e ct i ve	e at all'.)		
						ſ	5 - Not effective
		Base	1 - Very effective	2	3	4	atall
		Count	Row N %	Row N %	Row N %	Row N %	Row N %
All		70	14	34	31	16	4
Type of business	Retailer	15	20	40	20	13	7
	Generator	21	19	33	19	19	10
	Distributor	30	13	43	30	10	3
	Consumer directly connected to the grid	11	27	9	36	27	0
	Purchaser from clearing manager	10	20	20	30	30	0
	Contracted EA service	6	17	33	33	17	0
	Metering equipment owner	16	13	44	25	13	6
	Ancillary service agent	6	33	50	0	17	0
	Test house	7	14	0	43	29	14
	Load aggregator	3	0	67	33	0	0
	Electricity trader	10	10	40	20	20	10
	Other	1	0	0	100	0	0
Number of employees	Up to 100	32	9	38	38	13	3
	More than 100	38	18	32	26	18	5



			date link (Regardl s, using a 1 to 5 sc		•		,
		Base	1 - Very effective	2	3	4	5 - Not effective at all
		Count	Row N %	Row N %	Row N %	Row N %	Row N %
All		70	7	37	40	11	4
Type of business	Retailer	15	7	40	27	20	7
	Generator	21	10	43	24	19	5
	Distributor	30	3	40	43	7	7
	Consumer directly connected to the grid	11	9	45	45	0	0
	Purchaser from clearing manager	10	0	40	30	30	0
	Contracted EA service provider	6	0	50	33	17	0
	Metering equipment owner	16	0	38	44	13	6
	Ancillary service agent	6	17	33	33	17	0
	Test house	7	14	14	57	0	14
	Load aggregator	3	0	33	33	33	0
	Electricity trader	10	10	30	30	20	10
	Other	1	0	0	100	0	0
Number of employees	Up to 100	32	3	44	47	6	0
	More than 100	38	11	32	34	16	8

			ement (Regardless		•		•	
		is, using a 1 to 5 scale, where 1 means 'very effective', 5 'not effective at all'.)						
		Base 1 - Very effective 2 3 4						
		Count	Row N %	Row N %	Row N %	Row N %	Row N %	
All		70	3	27	47	17	6	
Type of business	Retailer	15	13	33	27	20	7	
	Generator	21	10	24	38	24	5	
	Distributor	30	0	23	53	13	10	
	Consumer directly connected to the grid	11	0	18	73	9	0	
	Purchaser from clearing manager	10	10	30	30	30	0	
	Contracted EA service	6	0	33	33	17	17	
	Metering equipment owner	16	6	19	44	19	13	
	Ancillary service agent	6	0	33	50	17	0	
	Test house	7	0	14	57	14	14	
	Load aggregator	3	33	0	0	67	0	
	Electricity trader	10	10	40	30	10	10	
	Other	1	0	0	100	0	0	
Number of employees	Up to 100	32	3	22	53	19	3	
	More than 100	38	3	32	42	16	8	



			op (Regardless of sing a 1 to 5 scale,	•		•	
		Base	1 - Very effective	2	3	4	5 - Not effective at all
		Count	Row N %	Row N %	Row N %	Row N %	Row N %
All		70	21	41	26	9	3
Type of business	Retailer	15	33	47	13	0	7
	Generator	21	24	29	29	14	5
	Distributor	30	17	57	17	7	3
	Consumer directly connected to the grid	11	18	45	36	0	0
	Purchaser from clearing manager	10	20	50	20	10	0
	Contracted EA service	6	33	17	33	17	0
	Metering equipment owner	16	13	50	25	6	6
	Ancillary service agent	6	17	67	17	0	0
	Test house	7	14	43	29	0	14
	Load aggregator	3	33	33	33	0	0
	Electricity trader	10	30	40	20	0	10
	Other	1	0	0	100	0	0
Number of employees	Up to 100	32	19	41	28	13	0
	More than 100	38	24	42	24	5	5

			stigator service (R ch is, using a 1 to 5	-	•		•
		tillik eac	ii is, usiiig a 1 to s	scare, where in	leans very enecti	ve , 5 not enectiv	5 - Not effective
		Base	1 - Very effective	2	3	4	atall
		Count	Row N %	Row N %	Row N %	Row N %	Row N %
All		70	11	40	33	10	6
Type of business	Retailer	15	20	27	27	13	13
	Generator	21	19	38	24	10	10
	Distributor	30	10	43	33	7	7
	Consumer directly	11	9	45	45	0	0
	connected to the grid						
	Purchaser from clearing	10	20	20	30	20	10
	manager Contracted EA service	6	0	50	33	0	17
	Metering equipment owner	16	13	31	31	6	19
	Ancillary service agent	6	0	67	17	0	17
	Test house	7	0	43	29	0	29
	Load aggregator	3	0	100	0	0	0
	Electricity trader	10	20	20	40	0	20
	Other	1	0	0	100	0	0
Number of employees	Up to 100	32	6	47	34	9	3
	More than 100	38	16	34	32	11	8



		Are you aware	of the role of the	Rulings Panel?
		Base	Yes	No
		Count	Row N %	Row N %
All		70	76	24
Type of business	Retailer	15	93	7
	Generator	21	86	14
	Distributor	30	80	20
•	Consumer directly	11	55	45
	connected to the grid			
•	Purchaser from clearing	10	80	20
	manager			
•	Contracted EA service	6	50	50
	provider			
	Metering equipment owner	16	94	6
	Ancillary service agent	6	100	0
	Test house	7	100	0
	Load aggregator	3	100	0
	Electricity trader	10	100	0
	Other	1	0	100
Number of employees	Up to 100	32	78	22
	More than 100	38	74	26



			scale where 1 me de balances the n		upply by, competi		
		Base	1 - Very well balanced	2	3	4	5 - Not at all well balanced
		Count	Row N %	Row N %	Row N %	Row N %	Row N %
All		70	3	36	47	10	4
Type of business	Retailer	15	0	47	40	7	7
	Generator	21	0	33	48	10	10
	Distributor	30	0	33	47	17	3
	Consumer directly connected to the grid	11	0	36	45	18	0
	Purchaser from clearing manager	10	0	50	40	0	10
	Contracted EA service provider	6	0	50	17	33	0
	Metering equipment owner	16	6	38	38	13	6
	Ancillary service agent	6	0	33	50	17	0
	Test house	7	29	29	29	0	14
	Load aggregator	3	0	33	33	33	0
	Electricity trader	10	0	50	40	0	10
	Other	1	0	0	100	0	0
Number of employees	Up to 100	32	3	31	66	0	0
	More than 100	38	3	39	32	18	8

		Q11_1 (Using a 1-5 scale where 1 means 'flexible and encouraging of innovation but may be uncertain' and 5 means 'certain and clear but may be inflexible', tick what type of regulation you think the Code should be.)						
		Base	1 - Flexible and encouraging of innovation but may be uncertain	2	3	4	5 - Certain and clear but may be inflexible	
		Count	Row N %	Row N %	Row N %	Row N %	Row N %	
All		70	6	29	37	23	6	
Type of business	Retailer	15	7	27	40	27	0	
	Generator	21	14	29	38	19	0	
	Distributor	30	0	33	43	23	0	
	Consumer directly	11	0	18	45	18	18	
	Purchaser from clearing manager	10	10	40	10	30	10	
	Contracted EA service	6	0	0	67	33	0	
	Metering equipment owner	16	13	31	38	19	0	
	Ancillary service agent	6	0	33	67	0	0	
	Test house	7	14	14	29	29	14	
	Load aggregator	3	33	0	33	33	0	
	Electricity trader	10	10	30	40	20	0	
	Other	1	0	0	100	0	0	
Number of employees	Up to 100	32	13	16	47	25	0	
	More than 100	38	0	39	29	21	11	



Questionnaire

INTRODUCTION

Thank you for agreeing to complete this survey. It will take approximately 10 minutes to complete. A progress bar along the top tells you how far through the survey you are. Responses and personal information are kept completely confidential and you will never be identified in any research reports.

To move through the survey:

Clicking the >> button at the bottom of each page saves your answers and moves you to the next page. The << button allows you to review your answers on previous pages. If you cannot see these buttons, maximise the page and/or scroll down.

You may close the browser window at any point and when you return to the survey again (by clicking the link on the email) the answers to the questions you have already completed will be retained.

Q1 - Q1

Using a 1-5 scale where 1 means 'I am fully aware' and 5 'I am not at all aware'; tick how aware you are of those parts of the Electricity Industry Act, the Electricity Industry (Enforcement) Regulations, the Electricity Industry Participation Code and the Electricity (Low Fixed Charge Tariff Option for Domestic Consumers) Regulations that apply to your business?

	1 - I am fully				5 - I am not at all	Not
	aware	2	3	4	aware	applicable
Electricity Industry Act	•	O	O	O	•	•
Electricity Industry (Enforcement) Regulations	0	O	0	0	•	0
Electricity Industry Participation Code	O	0	O	O	•	O
Electricity (Low Fixed Charge Tariff Option for Domestic Consumers) Regulations	0	0	O	O	0	0



Q2 - Q2

Thinking of those in your business who work in areas impacted on by the following Act, Regulations and Code, using a 1-5 scale where 1 means 'they fully understand' and 5 'they do not understand at all'; tick how well you think they understand the Act, Regulations and Code that apply to your business?

	1 - They fully understand	2	3	4	5 - They do not understand at all	Not applicable
Electricity Industry Act	0	O	O	O	•	0
Electricity Industry (Enforcement) Regulations	0	0	0	0	O	0
Electricity Industry Participation Code	•	0	0	0	O	0
Electricity (Low Fixed Charge Tariff Option for Domestic Consumers) Regulations	•	0	O	0	•	O

Q3 - Q3

[Randomized answer list]

Thinking about the Electricity Industry Participation Code and using a 1-5 scale where 1 means 'very good' and 5 means 'very poor', how would you rate it in terms of:

	1 - Very good	2	3	4	5 - Very poor	Not applicable
Ease of keeping up-to-date with changes	0	0	0	O	O	•
Ease of understanding	O	•	0	0	O	•
Ease to apply	O	O	O	O	•	•
Adding value to the industry	O	O	O	O	•	•
Having a low cost to apply	O	O	O	O	•	•

Q4 - Q4

[Randomized answer list]

Tick if any of the following apply to your company:

☐ We have a risk management programme
☐ We have a regulatory compliance manager
☐ A third party carries out our compliance obligations
lacktriangle Regulatory compliance is part of the role of our staff, but we do not have a regulatory compliance manager



Q5 - Q5

lacksquare Talk to an investigator service

Using a 1-5 scale where 1 means 'very high' and 5 'very low', tick how much you rate the cost of complying with the following Act, Code and Regulations?

	1 - Very high	2	3	4	5 - Very low	Not applicable
Electricity Industry Act	O	O	O	O	0	O
Electricity Industry (Enforcement) Regulations	•	O	0	0	•	•
Electricity Industry Participation Code	O	O	0	0	0	•
Electricity (Low Fixed Charge Tariff Option for Domestic Consumers) Regulations	•	•	0	0	•	0

Q6 - Q6
Do you know how to make a Code amendment proposal to suggest changes to the Code? Please tick which applies.
O Yes O No
Q7a - Q7a
The Authority uses a number of ways to try and ensure participants are aware of the Code. Please tick all that you have used.
Tick all used
☐ Guidelines on the Authority's website
☐ Holding a Compliance Conference each year
☐ Placing case studies on the Authority's website
Responding to requests from participants to do site visits
Compliance Update link
Facilitated settlement
☐ Industry workshop



Q7b - Q7b

Regardless of whether or not you have used it, tick how effective you think each is, using a 1 to 5 scale, where 1 means 'very effective', 5 'not effective at all'.

	1 - Very effective	2	3	4	5 - Not effective at all
Guidelines on the Authority's website	O	C	O	0	•
Holding a Compliance Conference each year	0	0	O	O	O
Placing case studies on the Authority's website	•	0	0	O	O
Responding to requests from participants to do site visits	O	•	0	O	O
Compliance Update link (5)	O	O	O	O	O
Facilitated settlement (6)	•	0	0	O	O
Industry workshop (7)	•	0	0	O	•
Talk to an investigator service (8)	O	O	0	O	O

\sim		$\boldsymbol{\sim}$	O
Uā	-	u	r

Are you aware o	f the ro	le of the	Rulings	Panel?
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O Yes

O No

Q9 - Q9

Using a 1-5 scale where 1 means 'very well balanced' and 5 means 'not at all well balanced', tick how well the Code balances the need for reliable supply by, competition in and efficient operation of, the electricity industry?

1 - Very well balanced	2	3	4	5 - Not at all well balanced
 O	O	O	O	•

Q10 - Q10

In what respect is the Code not well balanced and what improvements could be made to it?



Q11 - Q11

D1 - D1

Using a 1-5 scale where 1 means 'flexible and encouraging of innovation but may be uncertain' and 5 means 'certain and clear but may be inflexible', tick what type of regulation you think the Code should be.

	1 - Flexible and encouraging of innovation but may be uncertain	2	3	4	5 - Certain and clear but may be inflexible
(1)	•	0	0	0	0

[Randomized answer list]
What is your type of business in relation to electricity?
Tick all relevant boxes
Retailer Generator Distributor (local or embedded network owner or operator)/grid owner A consumer directly connected to the grid A purchaser from the clearing manager A contracted Electricity Authority service provider A metering equipment owner An ancillary service agent A test house A load aggregator
☐ A trader in electricity ☐ Other [Keep position ◆ Other]

Complet	e
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D2 - D2

O <10

O >100

What is the size of your organisation?

Number of employees

O >10 and <50 **O** >50 and < 100

Thank you for your participation. Your responses are an important part of our business information.

Please use your browser to close this window.

