

17 May 2022

Nova Energy Limited
PO Box 3141, Wellington 6140

Submissions
Electricity Authority
PO Box 10041
Wellington 6143

By email: tpm@ea.govt.nz

RE: Consultation Paper – TPM related Code amendments

Nova Energy (Nova) supports each of the proposed changes to the Code. That should not be interpreted as Nova changing its view that applying the TPM to embedded load that is co-dependent on embedded generation and therefore does not rely on the grid, is not appropriate.

Nova's responses to the questions are as follows:

Q.1 Agreed.

- a. It is important to the integrity of the TPM that Transpower uses the most accurate data available to it, and that Transpower has such access.
- b. The proposed fall-back mechanism provides a strong incentive for parties to make the data available as there is likely to be a significant difference between the estimated gross energy consumption and the true value.

Q.2 Agreed

- a. As above, access to accurate data is important.
- b. It is also important that Transpower uses the data consistently and does not favour any category of connected or embedded parties because the sources of data are different.

Q.3 – Q.8 Agree

Yours sincerely



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