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To: Infrastructure Regulation <[infrastructure.regulation@comcom.govt.nz](mailto:infrastructure.regulation@comcom.govt.nz)>

Subject: TIDR (2024) submission

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Dear Folks

This is a simple submission, with regard to what I suspect is a formula error within the example spreadsheet describing the proposed change to Annual Disclosure Section 8(1).

I confirm that there is nothing confidential contained within, and this may be published in full on your website.

As with all my submissions, I cannot speak on behalf of any participant. I come instead from the angle of an IT professional often tasked to make software changes in line with whatever these consultation processes produce. I generally do not comment on the rights or wrongs of any particular approach but rather from the vested interest of trying to avoid change which would be difficult from an IT perspective to implement, or where it appears that once implemented, the change might not produce the results the existence of which are being used to justify the change.

Regards

Bruce Palmer  
IT Professional

Rodney

The submission relates to the mock-up of the new Schedule 8(i), as presented on spreadsheet tab [S8.Billed Quantities+Revenues](#), columns R, U, X. **I'm not sure you want to add distribution and transmission quantities together. Prices in 8(ii) by all means, but not quantities in 8(i).**

Consider someone purchasing 50 litres of petrol, enough to get them 500km, at \$3 per litre. The petrol price is made up of \$1.60 for the petrol station, \$1 for the land transport fund and 40c GST. The driver doesn't say they purchased 50 litres at \$1.60, plus another 50 at \$1, plus another 50 at 40c, so instead of buying 50 litres (enough to get from Auckland to Bulls), they have actually purchased 150 litres (enough to get from Auckland to Balclutha).

So why is Disclosure 8(i) saying the EDB bills 365 days of distribution plus 365 days of transmission so manages to bill 730 days for each ICP during the year? Or if it charges distribution and transmission for volume, manages to bill its volume twice?

Scenario:

1. The EDB has fixed and volume billing, with volume billing in two ToU time bands "day" and "night".
2. The EDB has price category code RES for category 1 non-regulated residential plans, with prices \$2.50 per day (\$2 distribution, \$0.50 transmission), 4 c/kwh daytime (3c distribution, 1c transmission) and 0.4c/kwh nighttime (0.3c distribution, 0.1c transmission)

3. The EDB has 10,000 ICPs on this plan. They averaged 5,000 daytime kWh and 2,000 nighttime kWh during the year

The disclosure according to 8(i) as presently shown in the spreadsheet mockup:

Question	Disclosure	Derivation
Price category code	RES	
Standardised connection type	Residential (metering installation category 1)	
Standard or non standard group	Standard	
Other connection types	N/A	
Average no of ICPs	10,000	
Energy delivered	70,000	(5000kWh day + 2000 kWh night) x 10000 ICPs, divided by 1000 to get to MWh
Billed daily fixed charges		
Distribution billed quantity	3650000	10000 ICPs x 365 days
Transmission billed quantity	3650000	10000 ICPs x 365 days
Total billed quantity	7300000	10000 ICPs x 365 days, counted twice
Billed "daytime volume"		
Distribution billed quantity	50000	5000kWh day x 10000 ICPs, divided by 1000 to get to MWh
Transmission billed quantity	50000	5000kWh day x 10000 ICPs, divided by 1000 to get to MWh
Total billed quantity	100000	Doubled
Billed "nighttime volume"		
Distribution billed quantity	20000	2000kWh day x 10000 ICPs, divided by 1000 to get to MWh
Transmission billed quantity	20000	2000kWh day x 10000 ICPs, divided by 1000 to get to MWh
Total billed quantity	40000	Doubled

Where it makes sense to add them is where there are alternatives, and each billing will be in only one of the two columns being added

Billed daily fixed charges regulated	
Distribution billed quantity	P
Transmission billed quantity	Q
Billed daily fixed charges unregulated	
Distribution billed quantity	R
Transmission billed quantity	S
Total Billed daily fixed charges	
Distribution billed quantity	P+R
Transmission billed quantity	Q+S
Billed daytime volume regulated	
Distribution billed quantity	T
Transmission billed quantity	U
Billed daytime volume unregulated	
Distribution billed quantity	V

Transmission billed quantity	W
Total Billed daytime volume	
Distribution billed quantity	T+V
Transmission billed quantity	U+W

Etc

I would also expect P and Q to be the same R and S to be the same, T and U to be the same, V and W to be the same.

It could be argued that there are circumstances where a price component (per day, per kWh or per kVA) is billed for distribution but not transmission. Is that not the same as being billed for transmission, but priced at \$0? Doubling totals in schedule 8(i) is clearly not correct, but I cannot see the purpose of the separation into separate columns showing the same numbers in 8(i) unless the intention is to give a denominator in schedule 8(i) to match every detail cell in 8(ii). If so this would be an acceptable change for the report, but wouldn't it just be easier to state that?