



MAJOR ELECTRICITY USERS' GROUP

7 November 2006

Jenny Walton
Electricity Commission
By email to info@electricitycommission.govt.nz

Dear Jenny

Submission on Access to Daily Demand Data derived from Grid Metered Quantities

1. This is a submission by the Major Electricity Users' Group (MEUG) on the Electricity Commission (the "Commission") consultation paper, *Access to Daily Demand Data derived from Grid Metered Quantities*, dated 4th October 2006.
2. The attached table contains MEUG comments on the 3 questions in the consultation paper. In summary MEUG agree the Rules be amended to require publication of daily demand data to a free-to-air website.
3. MEUG also recommend the Rules require publication of monthly grid metering data. This is contrary to the consultation paper proposal.
4. MEUG agree with the consultation paper conclusion that the public benefits of publishing information relating to embedded generation exceed public detriments subject to one qualification. And that is that publication the day after of similar grid injection quantities should also be made on a free-to-air website.

Yours sincerely

Ralph Matthes
Executive Director

Question	Agree/Disagree	Comment
1. Do you agree that the Rules should be amended to require the Pricing Manager to publish daily demand data? Please support your answer with an explanation.	Agree	Agree with paragraph 84 and 85 of the consultation paper comparing the pros and cons of the proposal relative to the alternative of publication through an expanded GXP Global proposal
2. Do you agree that the Rules should not be changed to require the reconciliation manager to publish the monthly grid metering data, at least pending a wider review of information availability in the market?	Disagree	<p>It is highly likely a wider review of information requirements will determine there are public benefits in release of monthly metering data (or conversely highly unlikely to find there are no benefits).</p> <p>There are also likely to be costs in realising this benefit, eg the initial software set-up cost.</p> <p>There may be economies of scale advantages in combining software changes for free-to-air publication of daily demand data and monthly grid metering data. This needs to be investigated before a final decision on publication of monthly grid metering data is made.</p>
3. Do you agree with the Commission's assessment that publication of offered embedded generation quantities (or effective publication through publication of both the daily demand data and the daily grid metering data) would not cause substantial commercial detriment to some participants arising from the confidential nature of that information? Do you agree with the Commission's assessment that the Proposal would not give rise to risks for competitive outcomes (eg by facilitating "gaming")?	Qualified agreement	Agree with the discussion in paragraph 88 to 92 of consultation paper regarding disclosing information on embedded generation subject to one caveat. That is, the Commission also publish on a free-to-air website the day after the metered injection into the grid of all grid connected generators. This would result in both embedded and grid connected generation quantities being made available simultaneously on a free-to-air website.