

# Appendix B: Questions and format for submissions

Submitter: Contact Energy

Question no.	Related document	Question	Response
Q1	Procedures	Do you have any comments on the draft procedure document for the exchange of consumer consumption information?	<p>Under clauses 16, 17 and 19 of schedule 15.2 retailers have an obligation to ensure all consumption volumes used for the purpose of energy settlement are validated. However where that data is not used for billing or settlement purposes retailers have no obligation to validate this interval data. The proposed procedure would require retailers to provide unvalidated HHR data to consumers or their agents. Contact recommends the procedure be amended to require the provision of data only where it has undergone validation sufficient to satisfy clauses 16, 17 and 19 of schedule 15.2.</p> <p>Clarification should be provided on the type of estimates that are required to be provided as the data file specifications include a read status of E (estimate). Contact believes that only permanent estimates should be included in these files. For example, where a period bounded by two actual reads also has a number of estimate reads, it would only be appropriate to provide the consumption between the actual reads.</p> <p>Clause 7 – it is not clear what is meant by ‘certified’ and ‘non-certified’ ... ‘information’. Is ‘certified’ intended to mean ‘validated’?</p> <p>Notwithstanding, the Code amendment clause 11.32B(1) states “no later than 5 business days after the date on which a request is made”. The procedure should clarify in clause 15 that the obligation in clause 11.32B(1) is after the date the requester provides the retailer with sufficient verification to confirm the consumer or that the agent is authorised by the consumer. In Contact’s case, we require a number of points of verification to</p>

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			<p>ensure the security of our customers' information.</p> <p>There are inconsistent statements regarding the use of EIEP13C. For example, clause 21(c) states a "consumer must be able to request ... by electronic file request delivered by the registry EIEP hub", clauses 14 and 26(d) state "<u>agent may use</u>", while clause 41(d) states "<u>may only be used by agents</u>". It needs to be clarified in a table what consumers may use and what agents 'may' or 'may only' use.</p> <p>Clause 41(e) appears incomplete – is "either EIEP13A" intended to be "either EIEP13A or EIEP13B"?</p> <p>Clause 42 states the "retailer must provide the requested file format ..." when it appears any request via EIEP13C is intended to trigger provision of EIEP13A only – refer EIEP13C 'Application' and 'Description of when this protocol applies', which both state this format is only used to request EIEP13A.</p> <p>For all three EIEP formats, the clause numbering requires attention. Either the numbering needs to start with '1' for each section, or, the numbering needs to be sequential and cut across sections.</p> <p>EIEP13C –</p> <ul style="list-style-type: none"> <li>Header record 'The Validation Rules' for 'Recipient Participant Identifier' does not fit with the 'recipient'; instead, it describes sender validation rules/identifiers. However, it seems to Contact there should be three fields: 'Sender name' (consumer or agent name), 'Sender identifier' (valid sender identifier – if a consumer, it must be CUST, or if an agent, it must be an approved agent participant identifier), and 'Recipient identifier' (valid</li> </ul>

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			<p>retailer participant identifier).</p> <ul style="list-style-type: none"> <li>• In any event, it seems that the EIEP13C should be used by agents (consistent with clause 41(d) of EIEP13C), while the other options available to consumers must satisfy the retailer's verification criteria. For example, a retailer may require the following (or similar): <ul style="list-style-type: none"> <li>○ Phone call – require the caller to provide several points of verification; otherwise the request would be declined as invalid.</li> <li>○ Written request (most likely email) –require the requester to provide several points of verification; otherwise the request would be declined via return email with advice that the request is invalid until the required points of verification are provided.</li> <li>○ Via the retailer's web portal – would require a form to be completed, which satisfies several points of verification.</li> </ul> </li> <li>• Detail record – the retailer's account number should be replaced with 'Consumer no', consistent with the EIEP4 protocol.</li> </ul> <p>The procedure is silent on the requirement to provide estimated consumption. We do not see value in the retailer providing estimated consumption as a breakdown of the actual consumption between actual reads.</p>

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Q2	EIEP13A	Do you have any comments on the draft EIEP 13A?	<p>Currently not all participants comply with 'Period of Availability for All Inclusive'. For example, 19 hours of availability for all inclusive metering is often shown as IN24 or IN5 instead of IN19.</p> <p>It may be useful for the Authority to resolve this.</p> <p>Energy flow direction – Contact recommends this be amended to be L and G to align with registry codes rather than X and I; this also supports the example data file provided as part of Spec EIEP13B. The same logic should be applied to EIEP 1, 2 and 3 as the use of I and X can be confusing as evidenced by the suggestion to use 'Consumption' and 'Generation'.</p> <p>Read status – Contact recommends that only permanent estimates be included as estimated data in these files. Accordingly, the specification should be amended to reflect this.</p> <p>Consistency with other EIEP formats should be maintained wherever possible. Accordingly, 'Read Status' should be represented as either RD or ES.</p> <p>Date formats should also be made consistent. For example, EIEPs have date formats as DD/MM/YYYY, whereas in this case the draft formats introduce additional complexity. It is noted that there is a field for trading period where HHR data is provided.</p> <p>The ANZSIC code is available on the Registry and should be excluded from this file unless the purpose of its inclusion can be explained.</p>

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Q3	EIEP 13A	Do you consider there are alternatives to an EIEP 13A? Please give reasons for the alternatives.	No.
Q4	EIEP13B	Do you have any comments on the proposed EIEP 13B? Please give reasons and discussion where you disagree.	<p>Clause 34 states the file “includes only NHH consumption information”, yet Appendix E provides for more granular data – for example, hourly, half hourly, sub-half hourly, and trading periods, this creates confusion and should be clarified.</p> <p>The order for header record types and detail record type is inconsistent in places – for example, the header record types have column 5 as ‘Tariff name’ followed by ‘Read period start’, whereas the detail record type has ‘Period of availability’ followed by ‘Read period start date and time’.</p> <p>There is an inconsistency between EIEP13A and EIEP13B for the detail record type for ‘Unit quantity reactive energy volume’ – both should be ‘C’ as per EIEP13A.</p> <p>The sample MS Excel file implies only A (actual) reads, whereas ‘Read status’ includes A (actual) and E (estimated) reads in both EIEP13A and EIEP13B. It would be useful if the Authority could please clarify what is intended?</p> <p>Energy flow direction – Contact recommends this be amended to be L and G to align with registry codes rather than X and I.</p> <p>Read status – Contact has recommended that only permanent estimates should be included. Accordingly, the specification should be amended to reflect this.</p> <p>Tariff name – Contact questions the value of this field. As this file appears to be free text (CHAR50) there will be inconsistencies in the population of this field between retailers. If there is not going to</p>

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			<p>be a standard naming convention then this field should be excluded and the recipient should refer to the combination of register content code / period of availability to determine likely pricing options suitable.</p>
Q5	EIEP13B	<p>Do you consider there are alternatives to an EIEP 13B? Please give reasons for the alternatives.</p>	<p>It would seem that there should be one file format for HHR data, and another for NHH data. If a requester wants only NHH data, they should be able to request and receive only NHH data.</p>
Q6	EIEP13B	<p>Do you currently have a method for providing a consumer consumption information? If yes, what is the method and does it include the information that is in EIEP 13B?</p>	<p>All mass market customers with an AMS/ARC smart meter can access their HHR data via our portal currently. In due course we anticipate all consumers with smart meters will be able to access their HHR data.</p> <p>Mass market customers who request consumption data are provided with consumption data between actual reads.</p> <p>Commercial and Industrial (C&amp;I) customers who request consumption data are provided with HHR data. C&amp;I customers can also subscribe to a service to access their HHR data online.</p> <p>The content provided by Contact is not in the format specified for EIEP13B; however it is considered that the information provided meets the purpose for which summary consumption information is intended.</p>

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Q7	EIEP13C	Do you agree that an EIEP 13C is required? Please give reasons and discussion where you disagree or consider there are alternatives.	<p>Yes, and we consider it should be the only format for agent requests.</p> <p>This file should also have an optional return path back to the requestor to allow retailers to advise whether a request has been accepted or rejected (and, if so, what additional information is required).</p> <p>The Glossary of Terms should include a definition of consumer to clarify that the consumer is linked to the ICP.</p>
Q8	EIEP13C	Do you agree that an electronic request form should be provided to allow machine to machine requests provided that the retailer has verified the consumer's request? Please give reasons where you disagree.	Yes.
Q9	EIEP 13C	Do you agree with the use of a Consumer Authorisation code in EIEP 13C? If you disagree please give reasons.	<p>Contact disagrees with this approach. In order to meet our privacy requirements, Contact requires several points of customer verification when a customer calls into our call centre or sends an email.</p> <p>Contact does not believe that the use of a single consumer authorisation code is sufficient to meet our privacy obligations in confirming customer/consumer identity as part of this process.</p>
Q10	EIEP13A and 13C	Do you agree that the registry EIEP transfer hub should be used as one of the transfer mechanisms for EIEP 13A and 13C? Please give reasons where you disagree.	Yes.