

9 August 2016

Submission
Electricity Authority
PO Box 10041
Wellington 6143

Nova Energy Limited
PO Box 10141, Wellington 6143
www.novaenergy.co.nz

By email: submissions@ea.govt.nz

Dear Sirs

Re: Consultation paper: File format for exchanging generally available retail tariff plan data

Thank you for the opportunity to provide feedback on the Consultation paper on a file format for exchanging generally available tariff plan data.

As stated in our original consultation regarding this change on 4 August 2015, Nova Energy supports making its standard retail tariffs freely available to consumers and it currently does so through its website. Nova also publishes all its standard tariffs on Powerswitch and Switchme, as do most other retailers.

Nova Energy would need to incur development costs if it is to adopt the proposed format as its standard published price schedules are formatted quite differently.

We therefore encourage the Authority to consider a more flat file format, where the data is laid out across the page.

Please feel free to contact me if you wish to discuss our views further.

Yours sincerely



Paul Baker
Commercial & Regulatory Advisor
Email: pbaker@novaenergy.co.nz
Tel: 04 901 7338

Nova Energy's response to questions

Question No.	General comments in regards the:	Response
Q1.	Do you have any comments on the draft EIEP 14?	<p>Yes.</p> <p>The format proposed format is completely different to our current price schedule format, layout and structure. To programmatically prepare, collate, review and approve our pricing to be supplied in this format would require extra resourcing. Nova does not see as being warranted based on the number of requests we have had to date. Therefore, we prefer to supply our pricing data in a similar format to our standard published price schedules.</p>
Q2.	Do you have any specific comments on any of the file format fields or business rules?	<p>Yes.</p> <p>The proposed format “stacks” the different pricing components vertically. We would prefer to supply data in a horizontal format.</p>
Q3.	Do you consider there are alternatives to an EIEP 14 that could be used/ developed as a standard format? Please give reasons for any alternatives.	<p>Yes, As per our response to Q2 above.</p> <p>Alternatively we see no reason why the Authority would not consider allowing retailers to supply information as formatted for their internal staff or for their customers, for example retailer website pricing pages.</p>
Q4.	Do you consider that within the format that the hierarchy should be “customer” as a subset of “retailer”? Currently the format shows “retailer” as a subset of “customer”. Please give reasons.	No comment
Q5.	What are the pros and cons of specifying a JSON format (a) for this EIEP? (b) for other EIEPs both current and future?	Nova does not use JSON currently. Therefore we would not be willing to supply our data in this format.