



Decision and summary of submissions

Retail data project: a file format for exchanging generally available retail tariff plan data

20 September 2016

Introduction

- 1 As part of the retail data project, the Electricity Authority (Authority) amended the Electricity Industry Participation Code 2010 (Code) to require retailers to provide information about their generally available retail tariff plans to any person that requests them. The Code amendment took effect on 1 February 2016.
- 2 Along with connection and consumption data, providing mandatory access to information about a retailer's generally available retail tariff plans enables consumers, or their agents, to compare the tariff plans of competing retailers that are applicable to them. This reinforces the competition limb of the Authority's statutory objective.
- 3 On 28 June 2016, the Authority published a consultation paper *Retail data project: a file format for exchanging generally available retail tariff plan data* (consultation paper). The consultation paper is available on the Authority's website and the submissions have been made available on the same webpage.¹
- 4 In the consultation paper the Authority sought submissions on a proposed standardised file format that retailers could use on a voluntary basis when providing their generally available retail tariff plans in response to requests they receive. We labelled the proposed file format "EIEP 14".
- 5 The consultation paper asked submitters five questions:
 - Q1. Do you have any comments on the draft EIEP 14? Are there any options you think we missed? If so, please describe them.
 - Q2. Do you have any specific comments on any of the file format fields or business rules?
 - 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.
 - 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.
 - Q5. What are the pros and cons of specifying a JSON format (a) for this EIEP? (b) for other EIEPs both current and future?

¹ <http://www.ea.govt.nz/development/work-programme/consumer-choice-competition/retail-data/consultations/#c16094>

- 6 This paper:
- (a) summarises submissions
 - (b) responds to points raised in submissions
 - (c) provides the Authority’s decisions.

Feedback received

- 7 In response to the consultation paper, the Authority received submissions from the nine parties listed in Table 1.

Table 1 List of parties that provided feedback

Retailers	Consumer representatives and agents ²
Contact Energy	ConsumerNZ
Mercury Energy	Cortexo
Meridian Energy (this submission also made on behalf of Powershop)	Saveawatt
Nova Energy	
Pioneer Energy	
Trustpower	

How we structured this paper

- 8 In this paper, we have:
- (a) summarised common submission themes in the body of the paper, along with the Authority’s responses and decisions
 - (b) included detailed submission tables as Appendix A, in which we have organised submissions by question and then by submitter; these tables include the Authority’s more detailed responses to individual submission points.

The Authority’s decision

- 9 Having considered the feedback received on the consultation paper, the Authority has decided to:
- (a) update the draft EIEP 14 format document included in the consultation paper
 - (b) publish the updated EIEP 14 on the Authority’s website
 - (c) set an implementation date of 1 November 2016.
- 10 The Authority notes again that EIEP 14 is a voluntary format – retailers and consumer agents are encouraged to develop systems to transfer information about generally available retail tariff plans using the EIEP 14 format but it is not mandatory to do so.

² Consumer agents are businesses that maintain up-to-date information about retailers’ retail tariff plans and provide advice to consumers about the plan(s) that best meet their particular needs.

- 11 It is mandatory, however, that retailers provide their generally available retail tariff plans to anyone that requests them. Retailers may develop other means to meet consumer requests for information about their generally available retail tariff plans.
- 12 Having considered submitters' views, the Authority has decided to publish EIEP 14 in both CSV and JSON formats. The Authority notes that CSV format is already well established as the primary format for exchange of electronic data between participants and between participants and the registry. However, as some submitters have pointed out, the need to exchange hierarchically complex information may benefit from modern internet-inspired formats, such as JSON. Retail tariff data is a good example of this.

Key themes in submissions

- 13 This section provides a summary of feedback in the following areas:³
 - (a) there is general support for the format, but retailers preferred that the Authority keep the format voluntary
 - (b) questions about whether the format is intended for use by consumers
 - (c) retailer views that the format would be costly to implement
 - (d) comments about the complexity of the format versus the flexibility
 - (e) comments on format options: EIEP 14 (including CSV versus JSON) versus Powerswitch/What's My Number
 - (f) technical feedback on the format structure and detail.

Submitters generally supported the format but retailers preferred that the Authority keep the format voluntary

- 14 Consumer representatives and agents, and most retailers, expressed general support for the idea of a standardised file format for exchanging information about retailers' generally available retail tariff plans.
- 15 Contact, Mercury and Meridian all expressed the view that using the file format should be voluntary, citing development costs as the main reason in support of this view.
- 16 Saveawatt commented that, since the proposed format is voluntary, it would need to gauge the level of adoption by retailers before it chose to develop the capability to electronically read the EIEP 14 formatted files.

Authority's response

- 17 The Authority supports standardisation of file formats for electronic information exchange where such formats support the competition and efficiency limbs of the Authority's statutory objective.
- 18 However, the Authority notes that retailers may have already incurred the cost of developing a bespoke file format and/or other means of complying with their obligations under the Code to provide retail tariff plans. Mandating the file format would incur increased costs by those retailers.

³ Note that we have summarised the key points by topic, as opposed to by question number, because some topics were discussed in submissions in different places, including in general comments in a covering letter.

- 19 As stated in the decision paper *Retail Data Project: Access to Tariff and Connection Data 24 November 2015*, the Authority intends to introduce EIEP 14 as a voluntary file format and will monitor its voluntary adoption over time by retailers and consumer agents.

Questions about whether the format is intended for use by consumers

- 20 Some submissions indicate there is uncertainty about who will receive EIEP 14 files.
- 21 For example, Pioneer stated: *“The EIEP14 format and output is complicated and, in our view, could only be expected to be of use to organisations in the business of providing price advice as opposed to individual consumers.”*

Authority response

- 22 The Authority acknowledges that a relatively complex file format is required to provide a standardised format for encoding electronic files intended for machine to machine exchange. Requests for EIEP 14 formatted data files are appropriate for responding to electronic requests for information made by consumer agents.
- 23 While a consumer that is familiar with the use of spreadsheets could use the EIEP 14 format specification to decode an EIEP 14 formatted data file, the format has not been designed for general use by consumers. Retailers already use other means to provide information to Powerswitch and to respond to consumer requests for information about generally available retail tariff plans.

Retailer views that the format would be costly to implement

- 24 Some retailers noted that they had already incurred the costs of developing their own file formats and that developing an EIEP 14 file format would be too costly.
- 25 For example, Mercury commented that its *“... preference is that retailers provide data in formats that work for them as this ultimately encourages efficiency and avoids unnecessary costs being incurred, which are ultimately born by the end user.”*
- 26 Mercury further noted that it had: *“... received a handful of tariff data requests (less than ten) and in [its] view this does not justify the expense of implementing the proposed new formats.”*
- 27 On a similar theme, Meridian said it was: *“... concerned the format will be complex to administer.”*

Authority response

- 28 The Authority notes that Code requirements for providing retail data are intended to benefit consumers, in this instance by allowing consumer agents efficient access to retailers' generally available retail tariff plans.
- 29 The Authority appreciates that the costs of developing and maintaining information transfer systems are not insignificant in the context of an electricity retail business and that efficient business systems and processes are in the long-term interests of consumers. Nevertheless, adopting standardised formats is efficient from the perspective of a consumer agent that receives information from multiple sources. This, in turn, is in the long term interest of consumers because it increases their access to tariff plan comparison advice services.

- 30 Regarding the comment about the number of requests received to date, the Authority considers it is too early to infer the level of future uptake from the level of current uptake.
- 31 On the question of complexity, the Authority notes that some complexity is inevitable in a format that will work for a wide range of retail tariff plans.
- 32 The Authority considers that Trustpower's comment summarises the situation well. On the question of whether there were alternatives to EIEP 14, Trustpower responded: *"No, we believe that to show all available tariffs, there is a lot of complexity required so this format caters for the complexity. Other formats will likely lead to information such as terms, exit fees not being easily conveyed."*

Comments on format options: EIEP 14 (CSV versus JSON) versus Powerswitch/What's My Number

- 33 Firstly, Mercury and Nova noted that they use what they consider is a standardised format to provide tariff data to Powerswitch. For example, Mercury said: *"Most retailers are already supplying tariff information to 'Powerswitch' and 'What's My Number' in a standardised format. Continuing to provide data in this format is efficient as there is no additional costs to retailers and consumers and no change is needed."*
- 34 Secondly, the technical working group discussed the question of CSV versus JSON formatting for data files. Question 5 of the consultation paper asked about the pros and cons of specifying a JSON format for EIEP 14 and, potentially, for other current and future EIEPs.
- 35 Submissions on the head to head preference of CSV versus JSON formats reveal a preference for JSON, with some submitters noting that either would do and others making no comment.
- 36 ConsumerNZ, Contact, Cortexo, Saveawatt and Trustpower expressed support for the JSON format for EIEP 14. Mercury, Meridian and Nova expressed support for the CSV format. Pioneer expressed no preference for either format.
- 37 On the question of the suitability to CSV and JSON formats for other current and future EIEPs, responses indicated a general preference for whichever format is best fit for purpose; submitters considered that CSV was good enough for 'flat' data, while JSON formatting provided a better option for hierarchically structured data.

Authority response

- 38 The Authority notes that there is no standardised Powerswitch format; each retailer has implemented an agreed format with Powerswitch but a range of methods are used. The Authority considers that formats currently used for submitting data to Powerswitch would not be fit for purpose as a standardised format.
- 39 Because parties expressed preferences for both CSV and JSON, the Authority has decided to publish EIEP 14 in both formats and will monitor the uptake over time.

Technical feedback on the format structure and detail

- 40 Responses to question 2 provided a range of technical feedback on the detailed drafting of EIEP 14.

Authority response

- 41 We have considered each comment on the draft EIEP 14, updated it as appropriate and finalised EIEP 14 for publication on the Authority's website. The table of responses to question 2 provided in Appendix A includes the Authority's detailed responses to these submissions.

Appendix A Table of detailed submissions and responses

A.1 The following tables are organised by question and then submitter. A 'general comments' table is also provided that includes points submitted in addition to responses to the questions.

A.2 The Authority's responses to individual submission points is provided in the tables.

General comments		
Submitter	Submission	Authority's response
ConsumerNZ	-	-
Contact	<p>Contact's position can be summarised as:</p> <ol style="list-style-type: none"> 1. The EIEP 14 should remain voluntary; 2. Further clarification is required as to what the means of transfer will be; 3. Further clarification is required around the details of customer, plan, and tariff attributes; 4. The hierarchy within the format should ensure that "customer" is a subset of "retailer"; and 5. Standardisation should be a key consideration in terms of developing and maintaining the protocols. 	<p>Points noted.</p> <p>We have responded to the individual points under the relevant questions in the tables below.</p>
Cortexo	We fully support the Authority with regard to this project and believe that the outcomes will be increased competition and innovation in the electricity market that will directly benefit consumers.	Noted.
Mercury	We note that the proposed formats in the Paper are voluntary and that retailers may continue with their preferred formats for disclosure of tariff data.	-

	<p>Current formats</p> <p>Our preference is that retailers provide data in formats that work for them as this ultimately encourages efficiency and avoids unnecessary costs being incurred, which are ultimately born by the end user. Most retailers are already supplying tariff information to 'Powerswitch' and 'What's My Number' in a standardised format. Continuing to provide data in this format is efficient as there is no additional costs to retailers and consumers and no change is needed.</p> <p>We have already disclosed tariff data in this format to requesting parties and have not had any dissatisfaction. The current Powerswitch format for presentation is transparent, efficient, and satisfactory to the consumer. Importantly, it is easy for consumers to take this information, compare it to their bills and compare it with other prices.</p> <p>Finally, we note that the Authority's Decision Paper "Retail Data Project: Access to Tariff and Connection Data (24 November 2015)" states that <i>"[t]he Authority considers that, overall, retailers will not face significant transaction costs providing this [tariff data] information. Currently most retailers provide Powerswitch with information about their generally available retail tariff plans. The Authority will work with stakeholders to develop a file format for the exchange of retail tariff plan data, for voluntary adoption"</i>. Accordingly, the Authority has clearly seen the benefits in retailers providing data as they do to Powerswitch.</p> <p>For these reasons, although we provide comment on the Authority's alternative voluntary regime, we will continue with the status quo (as per formats to Powerswitch). For the avoidance of doubt, we strongly oppose the Authority making any alternative formats it develops compulsory in the future.</p>	<p>We understand retailers' general preference to develop and use their own bespoke formats. However, we are developing a standardised electronic file format with the aim of making it easier for consumers' agents to develop standard data interfaces with retailers. This, in turn, should benefit consumers.</p> <p>We understand that there is no such standardised Powerswitch or What's My Number format. Each retailer that provides tariff information to these services does so using a format that may be standardised (defined) from their perspective but is in fact not standardised across all parties that provide tariff information to these services. The draft voluntary file format does not preclude a retailer using a different format for Powerswitch and consumers.</p> <p>Noted.</p>
	<p>Alternative proposed formats</p> <p>Both proposed formats set out in the Paper would in our case require system changes and therefore result in significant and unnecessary implementation costs. While customers may see savings by comparing base rates, they may be disadvantaged overall by not being able to compare the overall costs involved, including any discounts.</p>	<p>Noted.</p> <p>The proposed format should enable information about discounts to be included in the file. However, we agree that the proposed format is not sufficient on its own to provide a comprehensive analysis of a specific consumer's delivered electricity cost; the consumer's consumption and connection information is also necessary to carry out such an analysis.</p>

	<p><u>CSV format</u></p> <p>Although we prefer to see all retailers using the format for disclosure as currently provided to Powerswitch, the CSV format is preferred over the JSON format. This is because it would be more user friendly to end consumers and have a lower implementation cost than the JSON format. However, as mentioned, this format is not appropriate for adoption by Mercury given the unnecessary costs and system changes that would result.</p>	<p>Noted. The format proposed is designed for machine to machine exchanges. It is not intended to be used by consumers – retailers will likely provide tariff plan information in alternative formats to meet requests from consumers.</p>
	<p><u>JSON</u></p> <p>The consultation paper mentions that the JSON format is “suited to Business to Business (B2B) transmission”, which means that JSON would not be very consumer friendly compared to the current format or the CSV option. If the means to receive, view and interpret information is too complicated this may discourage consumers from seeking this information. It would create a similar situation around consumers being discouraged from seeking out the best deal and incurring search costs that the Authority mentioned in the initial tariff and connection data decision and reasons paper section 4.39. This will increase their search costs, and may increase retailer costs through calls responding to queries. While consumers could seek out an agent, this yet again increases their costs and also takes the power away from the consumer to seek out the best deal, as the agent would seek out a collective deal.</p>	<p>Noted. The format proposed is designed for machine to machine exchanges. It is not intended to be used by consumers – retailers will likely provide tariff plan information in alternative formats to meet requests from consumers.</p> <p>This pre-judges the role of agents and how different agents might fulfil their role. To use (or not) an agent is a consumer choice.</p>
	<p>Conclusion</p> <p>We have received a handful of tariff data requests (less than ten) and in our view this does not justify the expense of implementing the proposed new formats. Tariff data in the current format provided to Powerswitch is by far the most cost effective option going forward. It contains all the necessary information for consumers to ‘shop around’ and is easy to understand and use. Complicated formats (particularly JSON) would not have the desired effect and ultimately lead to industry and consumer costs. Accordingly, in our view the proposed formats do not support the Authority’s objective to promote competition and efficiency.</p>	<p>View noted. We consider the historic level of requests is not a good indicator of future requests (eg once more agents are established and their services are marketed to consumers). The initiative seeks to decrease the costs of, and increase the options for comparing retailer tariff plans. If consumer agents were able to access all retailer tariff plans using a consistent standard format, we expect the demand would increase. Reducing barriers to consumer agents in this manner is consistent with the competition and reliability limbs of the Authority’s statutory objective. The voluntary nature of the format means that no unnecessary costs are created.</p>

<p>Meridian</p>	<p>All references to Meridian in this submission should be taken to also include Powershop unless stated otherwise.</p> <p>Appendix A provides our responses to specific consultation questions. In summary we consider:</p> <ul style="list-style-type: none"> • Giving specific feedback is difficult at this time, but our view at this stage is that the draft EIEP 14 format requires several simplifications. We would also like to understand the logic to requiring earlier (within 2 BDs) notification of additional attribute code information. • Uncertainty in relation to how the draft format will operate in a practical sense, and in the way that tariffs might evolve, mean that a voluntary approach is important. • Detailed cost / benefit analysis of a JSON format and central repository for tariff information is needed. 	<p>Noted.</p> <p>We have responded to the individual points under the relevant questions in the tables below.</p>
<p>Nova</p>	<p>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.</p> <p>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.</p> <p>We therefore encourage the Authority to consider a more flat file format, where the data is laid out across the page.</p>	<p>Points noted. The format proposed is designed for machine to machine exchanges. It is not intended to be used by consumers – retailers will likely provide tariff plan information in alternative formats to meet requests from consumers.</p> <p>The draft file format has been designed to represent tariff information in a way that standardises electronic access to the information by multiple consumer agents. A flat file would be unlikely to provide capability to capture the complexity of offers currently in use.</p> <p>We appreciate that development costs would be incurred by both senders and receivers but consider the benefit of providing efficient access to retailer tariff information in a standardised format is for the long term benefit of consumers.</p>

Pioneer	<p>We appreciate the work undertaken by the technical working group and the Standing Data Format Group to produce this standard format. Pioneer supports the introduction of a standard format. We also support more standardisation of the terms and definitions used in distributor and retailer tariffs which would reduce the complexity of comparing tariffs. We have not tested whether we can extract the information proposed in EIEP14 from our accounting system and so have no indication of the cost of setting up this data transfer.</p> <p>The EIEP14 format and output is complicated and, in our view, could only be expected to be of use to organisations in the business of providing price advice as opposed to individual consumers. We note the comment in the consultation paper:</p> <p><i>“An EIEP 14 formatted file is essentially a highly structured plain text file but would not be particularly human readable without subsequent electronic data processing.”</i> (para 3.3.2)</p> <p>Improving access to data for price comparisons has also been a focus in the UK. However, we note that the UK equivalent of the Commerce Commission is currently investigating if companies offering price comparisons are acting anti-competitively⁴.</p>	<p>Support noted.</p> <p>Points noted.</p> <p>Point noted. This is the intention.</p> <p>Noted.</p>
Saveawatt	<p>Saveawatt welcomes the initiative to create a standardised format for providing generally available tariff data.</p> <p>As the proposed format is voluntary Saveawatt will need to gauge the level of adoption by the industry before we would choose to develop machine reading, of the format, to advise clients of the plans available to them.</p> <p>We therefore believe that final format should be focused on encouraging retailer engagement by simplifying, as much as possible, the process to allow retailers to enter and update plans.</p> <p>While would prefer a JSON file be adopted we believe the level of retailer engagement is more significant to our decision to engage with the process than the format of the file (JSON or CSV).</p>	<p>Support noted.</p> <p>Noted.</p> <p>Noted. We consider a standardised, flexible file format provides a good starting point.</p> <p>Noted.</p>

⁴ See <https://www.gov.uk/cma-cases/energy-price-comparison-websites-suspected-anti-competitive-agreements>

Trustpower	<p>Introduction and overview</p> <p>Trustpower Limited (Trustpower) welcomes the opportunity to provide a submission to the Electricity Authority (EA) on its ‘<i>A File Format for Exchanging Generally Available Retail Tariff Plan Data</i>’ consultation paper (the Consultation Paper).</p> <p>We understand that the main points put forward in the Consultation Paper are as follows:</p> <ul style="list-style-type: none"> a) The Electricity Industry Participation Code 2010 was amended 1 February 2016 to require retailers to provide information around their generally available retail tariff plans, to any person that requests them; b) The amendment did not specify a format of method for retailers to provide this information; and c) The consultation paper is introducing a draft file format for use by retailers in order to provide this information. <p>Our submission focuses on two issues:</p> <ul style="list-style-type: none"> a) The file format; and b) The definition of Generally Available Retail Tariff Plans. 	
	<p>File Format</p> <p>Trustpower is in support of the file format as presented – it captures the complexity of offers currently in the market, as well as leaving room for future innovation.</p> <p>Trustpower believes that the hierarchy should be brand before customer, as brands generally operate independently of each other, rather than brands being mixed across a customer group.</p> <p>Trustpower supports the JSON format, as better suits the hierarchical nature of the information in question.</p>	<p>Support noted.</p> <p>Noted. We have provided a response in the tables below, under Q4.</p> <p>Noted.</p>
	<p>Generally Available Retail Tariff Plan definition</p> <p>One matter that arose during the working party’s work on the file format is that there is still some confusion around what constitutes a generally available retail tariff plan.</p> <p>Thus Trustpower believes it would be beneficial for more guidance to be provided in this respect, to ensure all retailers are consistent in approach.</p>	<p>This was discussed at the working group meeting. We note that “generally available retail tariff plan” is defined in Part 1 of the Code.</p>

Q1: Do you have any comments on the draft EIEP 14?		
Submitter	Submission	Authority's response
ConsumerNZ	ConsumerNZ supports the development of a standardised file format for exchanging tariff data.	Support noted.
Contact	EIEP14 must remain voluntary as there are different formats currently being exchanged between parties which are fit for purpose and providing the required information. Given the variety of pricing plans and attributes involved this format needs to take as wide a view as possible to capture this information. Given that the file is to become part of the EIEP suite of protocols consideration should be given to trying to standardise the file wherever possible to retain consistency.	View noted. Points noted.
Cortexo	Cortexo fully supports this format for the exchange of tariff data and consider it fit for purpose. Our view is that a standard format is important to ensure the growth of innovative solutions and the ability to automate solutions.	Support noted.
Mercury	This file format is mainly intended for consultants rather than consumers. Consumers would find this hard to interpret, which would lead to increased call volumes and additional cost to retailers. The code amendment specifically requires retailers to provide information about their generally available tariff plans to any person that requests them . This includes consumers. Therefore, the format must be easy for anyone who requests the data. To reduce search costs (time & effort), the data provided to consumers must be simple and easy to use. We strongly suggest retaining the current Powerswitch format.	We consider increased consumer engagement in comparing retailer offers is in accordance with our statutory objective. While the Code requirement is to provide tariff data to any person, we consider consumer agents are the parties most likely to request structured electronic data. The file format has been drafted with this in mind. The draft voluntary file format does not preclude a retailer using a different format for consumers.

Meridian	<p>The format as currently drafted requires a highly detailed level of information. The information supplied clearly needs to enable reasonable comparisons to be made within reasonable timeframes, but we are concerned the format will be complex to administer. Having EIEP 14 voluntary is important because it is unclear how the format will operate until it is actually being adopted in practice and also given ongoing tariff innovation.⁵</p> <p>Meridian requests the following adjustments are made to simplify the format:</p> <ul style="list-style-type: none"> • Re-classifying fixed term (date, period, and price) information as a category of plan (not tariff). • Consistent classification of information on discounts and credits (currently classified as a customer/plan attribute) and claw backs (currently classified as plan-related). <p>Within, say, 18 months, we consider the Authority should revisit the option of introducing a central repository for tariff information.⁶ In the longer term this may be more cost effective and efficient than the current retailer-administered arrangements.</p>	<p>We consider there are risks that an underspecified format would be complex to administer and would not adequately describe all potential tariffs plans a retailer might offer. The format has sought to strike a balance between a well-defined hierarchical structure (with some inherent complexity) and flexibility to accommodate change.</p> <p>Fixed term attributes could conceivably be used at both levels, so we have included them in in both levels in EIEP 14.</p> <p>Noted</p>
Nova	<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>	<p>Noted. We appreciate there are some upfront development costs that some retailers view as being unwarranted. Nevertheless, the initiative seeks to decrease the costs of comparing retailer tariff plans for the long term benefit of consumers.</p>
Pioneer	-	
Saveawatt	-	
Trustpower	No.	Noted.

⁵ With the Authority's distribution pricing review well underway, this can be expected to continue.

⁶ The Authority's 23 June 2015 'Access to Tariff and Connection Data' consultation paper (available: <https://www.ea.govt.nz/dmsdocument/19494>) includes some initial analysis of a central tariff data repository, but does not assess potential costs or alternative types of approaches.

Q2: Do you have any specific comments on any of the file format fields or business rules?		
Submitter	Submission	Authority's response
ConsumerNZ	ConsumerNZ sees that "Plan" should be a subset of "Network". Currently the format "Network" as a subset of "Plan". This is both logical and necessary especially most "Plan" Attributes (retailer codes, dates) could vary by network.	We disagree. A single plan may be defined at a national level, ie applying to all networks particularly where the rates quoted apply to wholesale market prices, and exclude network charges. In the case of a plan applying to multiple networks the format includes the capability to contain multiple network identification rows.
Contact	Discussion document: 3.3.1 Mentions machine to machine transfer via the internet but is non-specific as to the actual means of transfer. Clarification is required as to what the means of transfer will be.	In the short term we encourage parties to use the established registry EIEP transfer hub. However, in the future, retailers could set up an API or we could facilitate a central hub from which information could be pulled.
	Attribute codes: Any new attribute codes are to be sent to the EA within 3 months of the first use of the code. What action will the EA take (for example – can the EA decline use of a new attribute code)? How will the table of attribute codes be managed - will this be published and updated on the EA website?;	The Authority would only decline to update a new code to EIEP 14 if another code for the same purpose already exists. A retailer that uses a new code for the first time should advise the details of the new code to recipients of EIEP 14 until such time as the Authority publishes an update to EIEP 14. This detail has been added to EIEP 14.
	The preamble should include clarification on the difference between "trader" and "retailer" as this distinction is made within the protocol;	Noted. However, we believe this is not required in EIEP 14. The term trader has been used where the person must be a participant that trades with the clearing manager. The term retailer has been used where the person does not necessarily trade with the clearing manager.
	Recipient: requires participant identifier – do all third party service providers have a 4 character participant code?; and	Only third party providers that use the EIEP transfer hub have been allocated an identifier. We have amended the recipient field to allow for 'BLANK' if no identifier has been allocated.
	File header: Not consistent with EIEP (Report period start/end dates and Utility type missing).	Report period start/end dates were considered but are nonsensical to include as the fields would need to be left blank. While Utility type is contained in the file name, we have nevertheless added this field to align with other EIEPs.

	<p><u>Customer attributes:</u> Unit of measure: The validation rules refer to different unit types that do not exist in the current Unit of Measure table – and are not actual units of measure (eg ANZSIC). Should this field be renamed and a new table created and populated?</p>	<p>We have renamed this field and associated tables to 'text value'.</p>
	<p><u>Plan attributes:</u> Unit of measure (as per comment above). Network record type: Clarification is required on what should be populated in this field – is it "NETWORK"?</p>	<p>Network is not an attribute of a Plan (level 3), it is a separate section of the format. The information populated should be whatever is applicable to the attribute code.</p>
	<p><u>Tariff attributes:</u> Unit type – does this refer to the Unit of Measure table included in the protocol? - noting that this table differs from the table in other EIEPs as this is flagged as "not exhaustive". Should some consistency be applied here? Register Content Code: Validation rule allows for "Fixed" to be populated in this field- the Tariff section already has a F/V flag – is there any merit in including "Fixed" here if F has been populated? Period of availability is Num 2.1 whereas in EIEP1 Num 2 is used.</p>	<p>We have a project underway to propose amendments to the other EIEPs. The unit of measure table forms part of these proposed amendments. Noted. However, we believe 'Fixed' should remain as the name of the register content code for clarity. Noted. We extended the period of availability field to 2.1 to allow for trading periods (expressed as hours). We have a project underway that proposes amendments to the other EIEPs for consistency. We will include the Period of availability field in the proposed amendments.</p>
	<p><u>Tariff attributes:</u> Unit of measure: please refer to comments above.</p>	<p>Please see response above.</p>

Cortexo	<p><u>With reference to the JSON format:</u></p> <p>(1) Currently entire option is shown as being in an array. We do not think this necessary or desirable. There should be one file per JSON document</p> <p>(2) Field "Uniquifier" should be "Identifier" for clarity</p> <p>(3) Although not critical, it is worth noting that with JSON format fields are not name length limited and could be descriptive. For example LFC, DPC, FixVar, DTST could be clearer. FixVar could be FixedVariable for example.</p> <p>(4) For examples and actual file names should end in ".json" rather than ".txt". This is clearer and allows stand tools to recognise files and pick up errors etc.</p> <p>(5) Presumably these files could be zipped for transfer</p> <p>(6) Attribute objects should have a description with each to allow them to be displayed to the consumer by various services.</p>	<p>(1) We agree. The sample file on the Authority's website attempted to show several different examples of <i>entire</i> individual files of varying complexity. We have provided new/separate samples.</p> <p>(2) Noted. However, the field name seeks to maintain consistency with other EIEP files.</p> <p>(3) We agree. We have reviewed some of these while seeking to retain consistency with field names in other EIEPs. Some of these are as per point 2.</p> <p>(4) While we partially agree, for web publishing purposes, different browsers, machines, and 'standard' tools can be configured to treat a JSON extension in different and unpredictable ways, whereas a TXT file extension can be downloaded fairly reliably.</p> <p>(5) Yes they could be zipped.</p> <p>(6) The format is proposed only for machine to machine exchanges. It is not intended to be used for end consumers. Retailers may provide agents or consumers with attribute object descriptions as part of the material that a retailer may provide to agents or its consumers.</p>
	<p><u>Regarding Tariff:</u></p> <p>On fixed rates, why does it have some columns that only really relate to variable rates. For example RegisterContentCode.</p> <p>Would be clearer if example showed how seasonal rates are implemented.</p>	<p>The format for fixed tariff rate rows and variable tariff rate rows are the same for consistency. We have not introduced a different format for fixed charges alone and the retailer should populate the relevant fields and leave irrelevant fields as null.</p> <p>We have included some examples with seasonal rates.</p>
Mercury	<p>We prefer using a CSV format, as is more user friendly and easier to read.</p>	<p>Noted. As noted under Q5, we have decided to retain both CSV and JSON format alternatives. Parties may choose which they use.</p>

Meridian	<p>Giving specific feedback on detailed elements of the draft format is difficult at this pre-implementation stage. This was also found to be an issue recently through the process of implementing standardised consumption data formats.</p> <p>In terms of some initial feedback, proposed business requirement 9(c) of the 'strawman' protocol 14 format specifies that retailers must advise on the meaning of any additional attribute Code "within 2 business days of a request from a third party service provider".⁷ We query why this information cannot be provided at the same time as supplying the requested tariff data information (i.e. within 5 BDs).</p>	<p>Point noted.</p> <p>The period is a maximum. A retailer could elect to provide it at the same time if it wished to.</p>
Nova	<p>Yes.</p> <p>The proposed format "stacks" the different pricing components vertically. We would prefer to supply data in a horizontal format.</p>	<p>Noted. However, the nature of the data being provided is better suited to the formats we have proposed.</p>
Pioneer	-	
Saveawatt	-	
Trustpower	<p>Clarification of what tariffs need to be submitted would be useful.</p>	<p>Please note that "generally available retail tariff plan" is defined in Part 1 of the Code.</p>

⁷ Refer page 2, Appendix B of the Authority's consultation paper.

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.		
Submitter	Submission	Authority's response
ConsumerNZ	No	Noted.
Contact	There are alternative file formats that are fit for purpose but as mentioned as wide a view as possible is required to be captured by this file format to ensure that the diversity of attributes are included.	Noted.
Cortexo	Cortexo is not aware of any alternatives that would be suitable for adaption to this use.	Noted.
Mercury	The current format that is sent to Powerswitch and What's My Number, is a preferred format as it is already in place and easy for consumers to use. No change is needed	We understand that there is no such standardised Powerswitch or What's My Number format. Each retailer that provides tariff information to these services does so using a format that may be standardised (defined) from their perspective but is in fact not standardised across all parties that provide tariff information to these services. We conclude that the Powerswitch / What's My Number format would not be a suitable alternative for the current purpose.
Meridian	An EIEP 14 format seems to us the most appropriate choice at this time.	Noted.
Nova	Yes, As per our response to Q2 above. 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.	Noted. The format is proposed to be used for machine to machine exchanges and is voluntary. A retailer can elect to provide an alternative format.
Pioneer	-	
Saveawatt	-	
Trustpower	No, we believe that to show all available tariffs, there is a lot of complexity required so this format caters for the complexity. Other formats will likely lead to information such as terms, exit fees not being easily conveyed.	Noted.

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.

Submitter	Submission	Authority’s response
ConsumerNZ	ConsumerNZ supports the current hierarchy. We do not however see that the alternative would cause major problems.	View noted.
Contact	The file is Retailer-specific (RETPRCE) and therefore the CUSTOMER should be a subset of RETAILER. With the CSV format, the hierarchical relationships are order-dependant. This adds complexity in terms of consuming the file and potential for misinterpretation. An example of how to structure a CSV file for hierarchical relationships can be found in the Registry Functional Specification’s MM-010 file format.	View noted. We have decided to amend EIEP 14 to have customer as a subset of retailer.
Cortexo	<p>We note that the CSV version and JSON version are presented differently at this stage.</p> <p>We have a strong preference for customers being a subset of retailers as it makes sense to be able to process all customers across each retailer at one time.</p>	<p>Noted. This has been reviewed and the sample formats amended to contain the same information.</p> <p>View noted. We have decided to amend EIEP 14 to have customer as a subset of retailer.</p>
Mercury	-	
Meridian	At this stage we have no firm preference either way.	View noted. We have decided to amend EIEP 14 to have customer as a subset of retailer.
Nova	No comment	-
Pioneer	-	-
Saveawatt	-	-
Trustpower	Trustpower considers that customer should be a subset of retailer, so that the file allows for ready splits between brands, which should be before customer.	View noted. We have decided to amend EIEP 14 to have customer as a subset of retailer.

Q5: What are the pros and cons of specifying a JSON format (a) for this EIEP? (b) for other EIEPs both current and future?		
Submitter	Submission	Authority's response
ConsumerNZ	ConsumerNZ has no specific preference but is happy to support the use of JSON for this EIEP and other EIEPs.	Noted.
Contact	<p>Standardisation should be a key consideration in terms of developing and maintaining the protocols. There is merit in using JSON for this voluntary format given the nature of the data being included in the file and the potential for a large number of repeating fields.</p> <p>Most other EIEPs are "flat-file" structure with the exception of EIEP6 and EIEP8. Typical data volumes in these file formats are relatively small (EIEP8 has repeating rows to link the different attributes).</p>	Noted.
Cortexo	<p>For this EIEP14 we believe the JSON version is significantly easier to understand than the CSV version. This is due to the hierarchical structure of the data which is difficult to understand in the CSV format as column names keep changing for each record type</p> <p>In our view JSON is an excellent format to use for this sort of data as there is little replication and hierarchy is clear. It is also very suitable for API use. As the demand for more responsive systems increases then incremental updates can be catered for with JSON.</p> <p>We believe that future standards are likely to be suited to JSON as well, given that there is likely to be a need for hierarchy and responsive API use. As earlier standards are updated it may be appropriate to use JSON, but not as a matter of course.</p>	Points noted.
Mercury	While JSON may be suited for B2B transmission, it is not well suited for consumer use, as it is less well understood than CSV. In addition, formatting will be required that could result in errors and incorrect comparisons. Using the JSON format would drive calls into retailers as consumers seek technical assistance using it. Changing the formats to JSON will add to costs significantly.	The format proposed is designed for machine to machine exchanges. It is not intended to be used by consumers – retailers will likely provide tariff plan information in alternative formats to meet requests from consumers.

Meridian	<p>Meridian considers the paper’s claims of “strong support” from SDFG members for the adoption of a JSON format are overstated.⁸ As a whole, we consider the group had mixed views with some strongly in favour and others more ambivalent.</p> <p>Introducing a new JSON format – whether for EIEP 14 or other EIEPs – needs to be considered as part of a full cost / benefit analysis. An important consideration for this analysis to address will be whether a JSON format is to be provided as a replacement or in addition to the more common CSV format (i.e. to be at the choice of the requestor, not the retailer). Meridian’s systems⁹ do not currently support a JSON format and our initial view is that a JSON format is likely to involve significant costs and complexity, particularly if retailers will be required to operate using dual (JSON and CSV) formats.</p>	<p>View noted.</p> <p>Noted.</p>
Nova	Nova does not use JSON currently. Therefore we would not be willing to supply our data in this format.	Noted.
Pioneer	-	
Saveawatt	-	
Trustpower	<p>(a) The JSON format allows for a better representation of the hierarchy in play than CSV formats do.</p> <p>(b) For future EIEPs, if they are hierarchical in nature then we believe the JSON format would also be suitable.</p>	Noted.

⁸ Refer paragraph 3.7.4 of the Authority’s paper.

⁹ While Meridian’s own systems do not support a JSON format, the JSON format is able to be supported by systems operated by Powershop.