

AURORA ENERGY LIMITED

PO Box 5140, Dunedin 9058

PH 0800 22 00 05

WEB www.auroraenergy.co.nz



17 December 2018

Electricity Authority
PO Box 10041
WELLINGTON 6143

By email: submissions@ea.govt.nz

CONSULTATION PAPER – PROPOSAL FOR A SINGLE STANDARDISED REPORTING METHODOLOGY FOR EIEP1 AND DELIVERY MECHANISM FOR EIEP5A

Aurora Energy welcomes this opportunity to submit on the Electricity Authority's "Second consultation on electricity information exchange protocols (EIEPs) – Proposal for a single standardised reporting methodology for EIEP1 and delivery mechanism for EIEP5A".

No part of our submission is confidential and we are happy for it to be publically released.

If the Authority has any queries regarding this submission, please do not hesitate to contact:

Alec Findlater
General Manager Regulatory and Commercial
Aurora Energy Limited
alec.findlater@auroraenergy.co.nz
027-222-2169

Yours sincerely

A handwritten signature in blue ink, appearing to read "S. Ross", written over a blue circular scribble.

Shaan Ross

Regulatory Manager

Format for submissions: Proposal for a single standardised reporting methodology for EIEP1 and delivery mechanism for EIEP5A

Submitter	Aurora Energy Limited
-----------	-----------------------

No	Question	Comment
1	Do you agree that in the interests of standardisation and efficiency we should mandate a single standardised EIEP1 reporting methodology for trader to distributor files for NHH ICPs? If not, please provide reasons.	Yes.
2	If you agree that we should mandate a single standardised EIEP1 reporting methodology for trader to distributor files for NHH ICPs, do you agree that option 1 is the best option to implement. If not, please provide which of the Options 2 or 3 you prefer, and why?	We support a mandated single standardised EIEP1 reporting methodology for trader and distributor files for NHH ICPs and agree that Option 1 is the best option to implement.
3	As a trader, if you cannot currently provide replacement RM normalised files, please advise the estimated cost and time required to do so.	No comment.
4	As a distributor, if your current system does not have the capability to process replacement RM normalised files (including at least a month 3 replacement file), or you have not commenced developing the capability, please advise the estimated cost and time required to do so.	Our current billing system has the capability to process replacement files, therefore this would not be an issue for us.
5	Do you have any comments on the draft mark ups (attached as Appendices A and B) to EIEP1 and EIEP2 reflecting each of the three options?	No comment.
6	If we decide to implement one of the options, do you agree with setting 1 April 2020 as the implementation date, subject to a minimum lead time of 12 months from when we issue the decision paper? If not, please advise	We support a 1 April 2020 implementation date.

	what you consider to be a more appropriate implementation date and lead time, and why.	
7	Do you agree that in the interests of standardisation and efficiency we should mandate a delivery mechanism for EIEP5A planned service interruption information, instead of retaining the status quo? If not, please provide reasons.	We support, in principle, a mandated delivery mechanism for efficiency purposes.
8	If you agree that we should mandate a delivery mechanism, do you agree with our preferred option. If not which of the Options 1, 2 or 4 do you prefer, and why?	<p>We support either the status quo being retained, or the introduction of one of Options 1 to 3, for the following reasons:</p> <ul style="list-style-type: none"> • we see the benefit in the registry delivering customised outputs to traders and MEPs; • the costs associated with a move from emailing files to retailers to uploading those same files to the registry EIEP transfer hub would be minimal and would only impact on our own internal processes; and • in the case of Option 3, distributors would be able to choose to upload EIEP5A files to the EIEP transfer hub or to the registry SFTP. We note however, that if this choice did not exist in the final regulated EIEP5A, we could not support either Option 2 or 3 as the costs that we would need to incur to amend our internal systems and procedures in order to comply with the uploading of files to the registry SFTP would outweigh any benefits that we can perceive. <p>In implementing a mandated delivery mechanism, we believe that the ease and uncomplicated nature of the current process needs to be weighed up against the benefit of the process ultimately mandated.</p> <p>We oppose the introduction of Option 4 for the reason that the cost of implementing that option would, in our view, far exceed any potential benefit that would be achieved. In comparison to Options 1 to 3,</p>

		Option 4 significantly changes the current information transfer process, and could increase the risk of missed customer notifications.
9	If we mandated a delivery mechanism as for Options 1 to 4, what system costs would you incur? Please list the costs for each option.	If any of Options 1 to 3 were implemented, the system costs that we would incur would be minimal. However, as pointed out above, this is only the case if the choice remains for the distributor to upload their files to either the EIEP transfer hub or the registry SFTP. We have not quantified the system costs that would be incurred if Option 4 was adopted, however, we consider that they would be significant.
10	Do you have any comments on the draft mark ups of EIEP5A reflecting Options 1, 2 and 3?	No comment.
11	Do you have any comments on the draft registry functional specification?	No comment.
12	If we proceed, we intend to provide web services for planned outage information. Would you prefer a new dedicated web services for planned outage information or a a new version of icp_details with outage information appended? See Appendix C for further information.	No comment.
13	Do you have any comments on the draft Code changes proposed for Schedule 11.1 reflecting Option 4?	We do not support Option 4.
14	Do you agree that six to 12 months is sufficient lead time from the time the decision is issued to implement the proposed solution? If not, please advise what you consider to be a more appropriate implementation date and lead time, and why.	We consider that 6 to 12 months would be sufficient lead time if any of Options 1 to 3 were introduced.
15	Do you agree with the costs and benefits of the proposed amendments? If not, why not?	No comment.

16	What are your costs associated with making RM normalised the single standard reporting methodology for EIEP1? Please provide details.	We would incur no additional cost if RM normalised becomes the single standard reporting methodology.
17	Are there any other costs or benefits we have not identified?	No comment.
18	Do you agree with the objectives of the proposed amendment? If not, why not?	No comment.
19	Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?	No comment.
20	Do you agree the proposed amendment is preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010.	No comment.
21	If you prefer Option 4 over the other options, do you have any comments on the proposed Code drafting in Appendix D? If yes, please provide details.	No comment.
22	Do you agree the Authority's proposed amendments comply with section 32(1) of the Act?	No comment.
23	Do you have any comments on the drafting of the proposed amendment for Option 4?	No comment.