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Electricity Authority

By email: submissions@ea.govt.nz

Second consultation on Electricity Information Exchange Protocols

Genesis Energy Limited (**Genesis**) welcomes the opportunity to provide a submission to the Electricity Authority (the **Authority**) on the consultation paper *Second consultation on Electricity Information Exchange Protocols*, dated November 2018 (the **consultation paper**).

Please find our responses to the consultation questions on Electricity Information Exchange Protocols (**EIEP**) attached as Appendix A. If you would like to discuss any of these matters further, please contact Andrew Maseyk by email: andrew.maseyk@genesisenergy.co.nz or by phone: 07 857 1607.

Yours sincerely

A handwritten signature in black ink, appearing to read "McCrone".

Margie McCrone

Senior Advisor, Government Relations and Regulation

Appendix A: Responses to the consultation questions

QUESTION	COMMENT
<p>Q1: 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.</p>	<p>Yes.</p>
<p>Q2: 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?</p>	<p>Yes.</p>
<p>Q3: As a trader, if you cannot currently provide replacement RM normalised files, please advise the estimated cost and time required to do so.</p>	<p>We are currently providing replacement RM normalised files to some distributors.</p>
<p>Q4: 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.</p>	<p>Not applicable.</p>
<p>Q5: 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?</p>	<p>The references to non-half hour (NHH) installation control points (ICPs) and half hour (HHR) ICPs throughout the consultation paper are outmoded considering 80 per cent of ICPs included in EIEP1 are HHR advanced metering infrastructure (AMI). We note this is even higher for some distributors and/or retailers.</p> <p>Our concern is that some distributors will use this classification to force retailers to supply mass market ICPs with time interval volume information via EIEP3 formats not required for monthly billing.</p> <p>We suggest that if an ICP classification is required in EIEP1/EIEP3 file formats, then it would be better to base it on something such as meter categories than data measurement resolutions.</p>

<p>Q6: 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 what you consider to be a more appropriate implementation date and lead time, and why.</p>	<p>No. We suggest that 1 April 2020 should be the date by which changeover is completed, as opposed to the fixed change date.</p> <p>In our view, this will allow flexibility for distributors and retailers to work together to make the changes at a time that suits them best rather than all distributors/retailers having to make the change at one time.</p> <p>We note we have done these transitions i.e. as billed/incremental/RM normalised a few times already and they can be done at any time of year, provided the transition period does not cross the 1 April price boundary to avoid over complication.</p>
<p>Q7: 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.</p>	<p>Yes.</p>
<p>Q8: 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>	<p>Genesis prefers Option 3. In our view this provides the best opportunity for distributors and retailers to match any existing processes, keeping change costs to a minimum.</p> <p>We note that while some participants do have automated downloading from the Registry's Secure File Transfer Protocol (SFTP), this will be for specific files and is likely to be to different destinations/processes than for planned outages, so development will still be required if that path is chosen. Similarly, participants may also already have automation for EIEP transfers, so using existing automation on SFTP to tip a decision in favour of that delivery method is not valid.</p>
<p>Q9: 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.</p>	<p>As we currently manage varied notifications and delivery methods, (including EIEP5 and EIEP transfer), our costs will similar for all options.</p> <p>They will include configuring a file transfer tool to uplift EIEPs and move them to working folder to combine with customer and network data from billing engine/data stores for production and sending letters/texts to effected customers.</p> <p>We would estimate this cost to be in the region of \$5,000 - \$10, 000. Note we have not included Option 4 in this consideration. We believe it would come with added cost and do not believe it is a viable option.</p>

<p>Q10: Do you have any comments on the draft mark ups of EIEP5A reflecting Options 1, 2 and 3?</p>	<p>In our view, some clarification is needed as to what data will be included in the 'Sender' and 'Sent on behalf participant identifier' fields for the files delivered by the Registry to traders and meter equipment providers; for example, will it be RGST/Network identifier or Network identifier/blank? In any case, the Network identifier must be included in one of the two fields.</p>
<p>Q11: Do you have any comments on the draft registry functional specification?</p>	<p>We consider the EIEP hub should be the default delivery destination rather than the SFTP folders. This is because it is more likely to match any existing processes and is aligned with other EIEP delivery.</p>
<p>Q12: 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 new version of icp_details with outage information appended? See Appendix C for further information.</p>	<p>No comment.</p>
<p>Q13: Do you have any comments on the draft Code changes proposed for Schedule 11.1 reflecting Option 4?</p>	<p>We do not support Option 4.</p> <p>In our view, we do not see this type of dynamic information exchange as suitable for Registry Maintenance files.</p> <p>If a single transfer mechanism was mandated for the industry, then the EIEP transfer hub is the ideal selection, as this was the very purpose for which the hub was designed.</p>
<p>Q14: 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.</p>	<p>Yes. We would prefer closer to 6 months than 12.</p>
<p>Q15: Do you agree with the costs and benefits of the proposed amendments? If not, why not?</p>	<p>Yes.</p>
<p>Q16: What are your costs associated with making RM normalised the single standard reporting methodology for EIEP1? Please provide details.</p>	<p>We consider most of the costs will be internal costs in the re-creation of RM normalised files for the networks not receiving them, although there may be some external costs in configuring data stores etc. Much of our change will be from incremental to replacement formats: we anticipate this cost to be</p>

	\$10,000 – \$30,000.
Q17: Are there any other costs or benefits we have not identified?	No comment.
Q18: Do you agree with the objectives of the proposed amendment? If not, why not?	Yes.
Q19: Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?	Yes.
Q20: 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.	Yes.
Q21: 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.	As per our response to Q13, we do not support Option 4.
Q22: Do you agree the Authority's proposed amendments comply with section 32(1) of the Act?	Yes.
Q23: Do you have any comments on the drafting of the proposed amendment for Option 4?	<p>We strongly believe that if the Authority wishes to progress Option 4 - given that a consultation has only just mandated the use of the EIEP mechanism for the exchange of outage information - a more researched consultation is required to fully lay out the cost benefit analysis of changing from EIEP exchange to a Registry maintenance mechanism.</p> <p>Based on the information that has been presented in the consultation paper, Option 4 seems to be costlier to implement and removes flexibility from traders on how they chose to handle and process the information.</p>