

18 December 2018



Submissions  
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By email

### **EIEP1 and 5A Consultation**

Thank you for the opportunity to make a submission on the Authority's EIEP1 and 5A consultation paper.

MainPower (New Zealand) Limited's submission is in the Authority's preferred format and attached to this letter. No part of this submission is confidential.

Should you have any questions please do not hesitate to contact Sarah Barnes at this office.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Sarah Barnes". The signature is fluid and cursive, with a large initial "S" and "B".

Sarah Barnes  
**Regulatory Manager**  
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**1. Format for submissions: Proposal for a single standardised reporting methodology for EIEP1 and delivery mechanism for EIEP5A**

Submitter	Mainpower New Zealand Ltd
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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.	MainPower supports the proposals to standardise billing methods regardless of whether it is Replacement RM Normalised or As Billed format. We can manage As Billed or Replacement RM Normalised reporting files equally on our current system.
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?	MainPower can process Replacement RM Normalised files, we have no strong preference regarding whether As Billed report files are retained as a reporting option.
3	As a trader, if you cannot currently provide replacement RM normalised files, please advise the estimated cost and time required to do so.	N/A
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.	MainPower's current system is already capable of processing replacement RM normalised files for initial and month 3 replacement files.
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?	<p>For the draft EIEP1 specification for Option 1:</p> <p>(1) On page 4 the specifications 23 and 24 did not state whether these are NHH ICPs. We recommend that words be added to such effect "provide billing and volume information (insert) for NHH ICPs (end insert) in accordance with...".</p> <p>(2) MainPower also recommend that a new specification 25 be added that states "for HHR ICPs traders must provide billing and volume information in accordance with the As Billed methodology", and renumber subsequent specifications accordingly.</p> <p>(3) On page 10 of the draft specification the file type for ICPMMAB should be removed as ICPMMAB would be phased out if all NHH ICPs are to be reported under "Replacement RM normalised" methodology.</p> <p>For the draft EIEP1 specification for Option 2:</p> <p>(1) On page 4 the specifications 23 and 24</p>

		<p>did not state whether these are NHH ICPs. We recommend that words be added to such effect “provide billing and volume information (insert) for NHH ICPs (end insert) in accordance with...”.</p> <p>(2) The descriptions of methodology for each UoSA in specifications 23 and 24 appear mismatched.</p> <p>(3) We also recommend that a new specification 25 be added that states “for HHR ICPs traders must provide billing and volume information in accordance with the As Billed methodology”, and renumber the subsequent specifications.</p> <p>For the draft EIEP1 specification for Option 3:</p> <p>(1) On page 4 the specifications 23 and 24 did not state whether these are NHH ICPs. We recommend that words be added to such effect “provide billing and volume information (insert) for NHH ICPs (end insert) in accordance with...”.</p> <p>(2) The descriptions of methodology for each UoSA in specifications 23 and 24 appear mismatched.</p> <p>(3) We also recommend that a new specification 25 be added that states “for HHR ICPs traders must provide billing and volume information in accordance with the As Billed methodology”, and renumber the subsequent specifications.</p>
6	<p>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>MainPower’s billing system is already capable of managing any of the 3 options being considered, so it will not pose any issues for us. We support the 12 month lead in as it will allow time for all parties to update their systems.</p>
7	<p>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>We agree that a delivery mechanism should be mandated as it will reduce transaction costs for recipients of EIEP5A files from distributors.</p>
8	<p>If you agree that we should mandate a delivery mechanism, do you agree</p>	<p>MainPower has no preference between Options 1, 2, and 3. However we believe that</p>

	with our preferred option. If not which of the Options 1, 2 or 4 do you prefer, and why?	Option 4 will impose more costs on both distributors and retailers compared with other options.
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.	It is not possible to give a reasonable estimate of costs for MainPower without the final specifications.
10	Do you have any comments on the draft mark ups of EIEP5A reflecting Options 1, 2 and 3?	We have no additional comments regarding the mark ups of EIEP5A standard.
11	Do you have any comments on the draft registry functional specification?	We have no additional comments regarding the draft registry functional specification.
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.	We have no preference.
13	Do you have any comments on the draft Code changes proposed for Schedule 11.1 reflecting Option 4?	We believe the draft Code changes correctly reflect Option 4 being tabled.
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.	<p>In Mainpower's case we believe a 12 month lead time is insufficient for the proposed changes to EIEP5A. We are in the early stages of implementing an ADMS (Advanced Distribution Management System), which will manage the whole MainPower network. A function of the new system will be to plan and control Outages so functions related to generating EIEP5A data would have to be included within the scope of the project.</p> <p>In order for a working ADMS to be fully functioning with the new EIEP5A specification, a decision on the finalised standard has to be made quickly. Even with a finalised standard, we will require a lead time of longer than 12 months due to budget process required to implement the changes required. We envisage a number of other EDBs and retailers will require similar lead times to make similar system changes, meaning that many participants would prefer a lead time of longer than 12 months as well. Therefore the Electricity Authority should consider extending the suggested lead time beyond the 6 to 12 month period proposed in</p>

		the consultation document.
15	Do you agree with the costs and benefits of the proposed amendments? If not, why not?	We agree with the costs and benefits identified for the proposed amendments.
16	What are your costs associated with making RM normalised the single standard reporting methodology for EIEP1? Please provide details.	The costs have already been accounted for as part of the redevelopment of our billing system.
17	Are there any other costs or benefits we have not identified?	We believe all costs and benefits have been considered.
18	Do you agree with the objectives of the proposed amendment? If not, why not?	We agree with the objectives of the proposed amendment being stated.
19	Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?	We agree that the benefits of the amendment outweigh the costs.
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.	We agree with the proposed amendment.
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.	We prefer Option 3 to be implemented.
22	Do you agree the Authority's proposed amendments comply with section 32(1) of the Act?	We agree with the Electricity Authority's position.
23	Do you have any comments on the drafting of the proposed amendment for Option 4?	We have no comment regarding the amendment drafted.