

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

Submitter	Mercury
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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.	Mercury agrees with this approach.
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?	Mercury agrees with option 1
3	As a trader, if you cannot currently provide replacement RM normalised files, please advise the estimated cost and time required to do so.	-
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.	-
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	Yes Mercury believes changes can be made with this notification period.

	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.	Mercury agrees that EIEP5A should be the delivery mechanism
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?	Mercury agrees with the preferred option.
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.	No comment at this stage as we need more time to estimate the costs for the required changes.
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.	Mercury would prefer a new dedicated web service
13	Do you have any comments on the draft Code changes proposed for Schedule 11.1 reflecting Option 4?	Mercury is still assessing the draft changes and will advise the Authority if we have any concerns.
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.	Mercury believes that 12 months will be more realistic period.

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.	No comment
17	Are there any other costs or benefits we have not identified?	None that Mercury has identified
18	Do you agree with the objectives of the proposed amendment? If not, why not?	Mercury agrees with the objectives
19	Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?	Whilst Mercury has not been able to estimate the costs we are of the view that the benefits will outweigh them.
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.	Agree
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.	Mercury supports the preferred option so no further comments.
22	Do you agree the Authority's proposed amendments comply with section 32(1) of the Act?	Agree
23	Do you have any comments on the drafting of the proposed amendment for Option 4?	No comment