

Appendix D Submission form

Consultation for 'Options for Revised Electricity Information Exchange Protocol – EIEP14A: Retailer product information'

Submitter	Contact Energy
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Questions	Comments
Q1. Do you agree with our preferred option (Option 1)?	<p>We prefer Option 2 because it is simpler, although we would prefer if Option 2 could be modified to include the 'Tariff Type' concept provided in Option 1. That would reduce the duplication of the tariff metering information which is a particular issue with TOU plans.</p> <p>We don't see much benefit in the Tariff Region concept in Option 1 because our pricing is set up with tariffs linked to networks, which are linked to plans. We think it unlikely that many retailers will have common tariff rates across multiple networks, so the benefits of the reduction in duplication will be limited.</p>
Q2. Do you agree with the structural changes we propose for both options? If not, please explain why?	<p>We think there may need to be some changes to the Plan and/or tariff fields across both Option 1 and 2:</p> <ul style="list-style-type: none">• Should there be a field making clear which plans are currently in-market (i.e. that new customers can join on)? It seems likely that the EIEP14A will most often be used to view information about current in-market plans so having a flag that lets users easily find these plans would be useful. It could be something like "In_market" with a "Y" or "N" required?• We don't record when our plans closed to new users, so it's not clear what benefit the 'Close date' field will offer. Wouldn't the 'In-market' flag make it redundant, and not require a date to be provided? If it is retained it should be made optional, as we won't know the date when plans became unavailable to new customers.• The purpose of the 'End date of plan' is unclear. It seems to assume that the unique product ID code will change each time tariff prices change - but this would mean that customers see a new product ID on their bill after every price change. <p>Instead, we recommend that the specification have the new attributes 'Start date' and 'End date' linked to the tariff itself. We will have plans in place for many years but are likely to change the tariffs annually. That would also allow EIEP14A to handle scenarios where tariffs within a plan are changed at different times. (E.g. a plan might have several Christchurch customers whose tariffs could be changed on 1 April 2027 but the Auckland customer tariffs are changed until 1 April 2028. Despite the difference in timing, the Auckland and Christchurch customers are still on the same plan with the same unique product ID).</p> <p>That addition of the new tariff 'start date' and 'end date' fields also accounts for situations where EIEP14A is expected to include current</p>

	<p>tariffs as well as future tariffs that reflect upcoming price changes (e.g. we notify customers on 20 October that their prices will change on 1 December). If we provide the EIEP14A between 20 Oct and 1 December, we assume that we would be asked to provide both the current and future tariffs? It's not clear that this would be possible based on the current options proposed.</p>
Q3. Are there any other structural changes you consider necessary to support the protocol achieve its objective?	As per the response to Q2.
Q4. Do you agree with our proposal to adopt the ISO 8601 date and date-time formats? Do you foresee this adoption impacting your use of other EIEPs in any way?	Yes
Q5. Have we identified all the required attributes to be added? If not, what are we missing?	Yes.
Q6. Do you agree with the attributes we propose to introduce into EIEP14A? If not, please identify which attributes and explain why not, or what changes are required?	Yes
Q7. Do you consider the protocol adequately enables representation of feed-in tariffs for different generation types?	Yes
Q8. Do you agree with our assessment of the limitation of EIEP14A to represent aspects of electricity plans with undisclosed values? Do you believe this limitation is adequately offset for the reasons outlined above? If not, please explain why.	Yes
Q9. Do you agree with the proposal to modify the business requirement to provide the Authority a right of decline to any requests for additional attributes.	Yes
Q10. Do you agree with the objective of EIEP14A as describe above? If not, why not?	Yes
Q11. Do you agree that the Authority's proposals meet these objectives?	<p>Yes, although we expect additional questions will arise as retailers implement the new protocol. The pricing data is inherently complex and there may be edge cases that aren't covered by the current specifications. It seems likely the EA will need to iterate minor specification changes over the next six months in response retailer feedback (as occurred with the EA Retail Market Monitoring tables last year). There may also be requests for changes from Daylight/Billy or Powerswitch if they use the new format. We would recommend that the EA have a process in place for making and communicating these changes to all retailers in a transparent, timely and consistent way.</p>
Q12. Have we identified all the main costs and benefits? If not, what are we missing?	Yes
Q13. Do you agree the benefits of the proposed EIEP14A outweigh its costs? If not, why not?	<p>We believe the benefits of option 1 and option 2 are very similar, but option 2 will be simpler to understand and implement (especially if it can be modified to include the Tariff Type).</p> <p>It will take a significant amount of work to build EIEP14-A as it differs significantly from the current tariff files we provide to switching providers and other third parties. The approach does not fit neatly with the way our pricing data is stored. Most retailers have never used EIEP14, so creating EIEP14A will require starting from scratch. It will need data engineers and architect resource that are in very high demand (often for other compliance activity from the EA). We do not currently have a unique product ID in our system, so this will need to be built - and new logic created - to handle the complex linkages between tariffs, plans and discounts.</p>

	<p>It's still unclear whether the major power comparison sites (Powerswitch and Billy) will use EIEP14A, because it doesn't include information about other products like mobile or broadband. The outcome may be that the file has very limited usage despite significant work by retailers to build it. The non-tabular CSV and JSON formats proposed aren't user-friendly for non-technical types: some people just want simple data that can be viewed in Excel with consistent columns across all rows. It seems likely some third parties and customers will continue to request data in a simplified format, meaning that we will need to maintain formats other than EIEP14A.</p>
<p>Q14. Do you agree the proposed preferred EIEP14A 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.</p>	<p>We think the new options are better than the current EIEP14. However, including plans that are no longer available will make Contact's EIEP14A file extremely large—potentially millions of rows—because each plan and discount combination still used by a customer needs its own ID. That file size could be hard for third parties to work with.</p>
<p>Q15. Do you have any other comments?</p>	