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

Submitter	Contact 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.	Contact agrees with the proposal to standardise and mandate the EIEP 1 reporting methodology. However Contact is concerned that participants' interpretation of what are NHH ICPs may differ and this could cause confusion between traders and distributors. For example, traders consider the Registry settlement type flags (NHH / HHR) as the basis for determining an NHH ICP, however distributors' interpretation is different. We suggest that as part of mandating EIEP 1 under the Code clear definitions are included to ensure consistent rules are applied for determining ICP selection.
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?	Contact prefers Option 1 – while some parties may initially not be in a position to provide RM Normalised files, these traders maybe in a position to report using the Half Hour As Billed (HHAB) methodology if the selection criteria issue that Contact has highlighted in Question 1 determines that ICPs submitted as HHR can then be included in the HHAB version of EIEP1.
3	As a trader, if you cannot currently provide replacement RM normalised files, please advise the estimated cost and time required to do so.	Contact can currently provide replacement RM Normalised files
4	As a distributor, if your current system does not have the capability to process replacement RM normalised files	N/A

	(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?	
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 what you consider to be a more appropriate implementation date and lead time, and why.	Agree with 1 April 2020 subject to a minimum lead time of 12 months from date of issuance of the decision paper.
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.	Contact agrees with the proposal to standardise and mandate the delivery mechanism for EIEP5A.
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?	Contact's preferred option is a hybrid of Options 3 and 4 without the need to create a new registry maintenance file format or interface. Contact recommends that the EIEP5A format should be retained and the registry functionality further developed to suit the planned outage function. Retaining EIEP5A format as the standard and creating a web service interface for those with the capability or the desire to interface via this mechanism will enable all parties to follow a standardised path and incentivise a move towards close to real time notifications. The key to this process being efficient is the enablement of web services, not the file format itself. Contact believes this will provide the foundation for a great customer focussed process and it will be simpler and more cost effective to

		develop functionality at the source (electricity registry) as opposed to imposing interface and system changes on all participants. The industry should invest now, do it once and do it right. If a hybrid of Option 3 and 4 is untenable, Contact's preferred alternative approach would be Option 4. Contact believes Option 4 would best serve participants and customers in the longer term, even though participants may incur additional costs to enable implementation. There is a need to accelerate the near real time notifications of planned outages between participants, and establish a framework in the registry. This will create the potential to facilitate unplanned outage (EIEP5B) notifications, in the future. Another way to improve communication on outages is to potentially incorporate other participants into the EIEP5 outage management process once it is formally part of the registry process. This collaborative approach to outage management will provide customers with a better outcome overall.
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.	Option 1 – Minimal cost for Contact to implement. Option 2 – Minimal cost for Contact to implement. Option 3 - Minimal cost for Contact to implement. Option 4 – Contact estimates that this option would cost anywhere between $50,000 and $100,000 to fully integrate into our system. Option 3 &4 (alternative proposed solution) – Minimal cost to Contact and other participants as development costs will be shared through centralised registry functional changes.
10	Do you have any comments on the draft mark ups of	Contact recommends that an industry technical group be established

	EIEP5A reflecting Options 1, 2 and 3?	to assess and refine the requirements, once the preferred option has been decided. The technical group could also assist with planning and project timelines along with any considerations around impacts to participants, testing and implementation.
11	Do you have any comments on the draft registry functional specification?	Due to the technical nature of the issue Contact recommends a technical group is established (or use an appropriate existing group – perhaps SDFG – Standing Data Formats Group) to assess and validate the technical details.
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.	Our preference would be to include a clean/standalone web service for the planned outage function.
13	Do you have any comments on the draft Code changes proposed for Schedule 11.1 reflecting 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.	Contact would require 12 months to implement a new registry interface (option 4). All other options could be implemented within 3 months.
15	Do you agree with the costs and benefits of the proposed amendments? If not, why not?	
16	What are your costs associated with making RM normalised the single standard reporting methodology for EIEP1? Please provide details.	No additional costs
17	Are there any other costs or benefits we have not identified?	The appropriate option should be implemented to enable extension to unplanned outages in the future. There are also benefits in allowing other participants to supply information into the registry (e.g. on

		identification of a device losing power or a related resolution of supply post a natural event or outage).
18	Do you agree with the objectives of the proposed amendment? If not, why not?	Yes
19	Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?	Yes the benefits of the proposed amendment outweigh the cost if the intention is to extend this functionality to EIEP5B unplanned outages in the near future.
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.	As mentioned under Question 8, Contact prefers a hybrid of options 3 and 4 to reduce impacts and implementation costs on all participants. This will create a platform for a great customer experience and enable future improvements to optimise and make the process more efficient.
22	Do you agree the Authority's proposed amendments comply with section 32(1) of the Act?	
23	Do you have any comments on the drafting of the proposed amendment for Option 4?	No