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

Submitter Cory Annable – Electric Kiwi

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.	Yes, we agree that the move to a single standardised EIEP1 should be mandated.
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?	Yes, we agree that Option 1 is the best 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.	N/A
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
6	If we decide to implement one of the options, do you	Yes, we agree

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	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.	
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.	Yes, we agree that the EA should mandate a standardised 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?	Yes we agree with the preferred option (3).
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.	There would be no development costs for us if option 3 was implemented. We currently receive two distributors EIEP5as through the registry sftp, and our system is built to auto send notifications to customers. If the delivery options are 1, 2, or 4, then it will incur a cost but we are
		unsure of the total amount.
10	Do you have any comments on the draft mark ups of EIEP5A reflecting Options 1, 2 and 3?	No, we do not have any comments
11	Do you have any comments on the draft registry functional specification?	No, we do not have any comments
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 do not have an opinion on this currently and would need further time to consider the design proposed if it were a new dedicated web service.

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13	Do you have any comments on the draft Code changes proposed for Schedule 11.1 reflecting Option 4?	We do not agree that Option 4 should be implemented.
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.	Yes, 6 to 12 months is more than sufficient to implement this solution. We would like to reiterate our usual stance that other retailers or distributors legacy systems should not be the reason to delay this type of standardization.
15	Do you agree with the costs and benefits of the proposed amendments? If not, why not?	Yes, we agree
16	What are your costs associated with making RM normalised the single standard reporting methodology for EIEP1? Please provide details.	There will be no cost as we currently can provide RM normalised.
17	Are there any other costs or benefits we have not identified?	No
18	Do you agree with the objectives of the proposed amendment? If not, why not?	Yes, we agree
19	Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?	Yes, we agree
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.	Yes, we agree that the proposed amendment is preferable to other options
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.	N/A
22	Do you agree the Authority's proposed amendments	Yes, we agree

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	comply with section 32(1) of the Act?	
23	Do you have any comments on the drafting of the proposed amendment for Option 4?	We do not agree that Option 4 should be implemented.