

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

Submitter	Nova Energy Limited
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No	Questions – EIEP1	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.	<p>Yes.</p> <p>It would also help if the definitions around HHR data reconciliation and TOU reporting requirements were better defined; as there is a wide scope for each distributor to place different requirements on the way traders must submit data. This causes complexity and additional costs for traders. It is also important in the context of expected changes in distribution pricing.</p>
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?	<p>Yes, it is consistent with the methodology currently used in most cases and creates fewest problems for parties.</p> <p>Nova notes however that many Consumer Trusts base their rebates/network discounts on as-billed EIEP1s. As such, the benefits of standardising to RM Normalised are somewhat negated as traders then still have to support both formats, i.e. RM normalised for network invoicing, and as-billed for network rebates.</p> <p>This requirement by-passes the proposed EIEP1 regulations because the additional data request may potentially be classified as an additional data request rather than the standardised exchange of data between a trader and distributor for invoicing purposes. Such requests are not ad hoc and tend to be the same every year for each network where applicable.</p>

3	As a trader, if you cannot currently provide replacement RM normalised files, please advise the estimated cost and time required to do so.	Nova can, and does provide replacement RM normalised files where the distributor will accept those.
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?	<p>The changes should not preclude traders and distributors from using RM normalised for HH as well as NHH (I.e. there is no ICPHHRM file type in the proposed specification)</p> <p>Multiplier errors and reversals can still occur in ICPHHAB EIEP1 so examples of how to deal with reversals in the specifications should be retained.</p>
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.	The implementation date should be 'no later than 1 April 2020' and as soon as the distributor and traders on their network have the capability of handling those files.

No	Questions – EIEP5	Comment
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.	Agree
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?	Agree 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.	N/A
10	Do you have any comments on the draft mark ups of EIEP5A reflecting Options 1, 2 and 3?	No
11	Do you have any comments on the draft registry functional specification?	No
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 new version of icp_details with outage information appended? See Appendix C for further information.	icp_details with outage information appended
13	Do you have any comments on the draft Code changes proposed for Schedule 11.1 reflecting Option 4?	No

15	Do you agree with the costs and benefits of the proposed amendments? If not, why not?	Agree. Maintaining systems to manage one reporting methodology and assurance that recently switched customers receive notification of planned service interruptions outweigh any trader incurred development costs.
16	What are your costs associated with making RM normalised the single standard reporting methodology for EIEP1? Please provide details.	Nil. It would provide savings from no longer needing to deal with exceptions and errors arising from those.
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?	Agree
19	Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?	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.	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.	N/A
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