

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

Submitter	Simply Energy
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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.	Yes
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?	Option 1 would be our preferred option. One format for everything is easier to manage not multiple versions.
3	As a trader, if you cannot currently provide replacement RM normalised files, please advise the estimated cost and time required to do so.	Simply Energy currently provides RM normalised files to a few Distributors. Some internal systems would need to be updated but the time to make these changes would be minimal.
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 comment.
6	If we decide to implement one of the options, do you	While 1 April is used for the majority of Distributors for pricing

	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.	changes there are others, like Embedded Network owner who have a different date. Would this change have to align to Pricing changes? Surely one date would be more beneficial than multiple dates and this would be easier. Our recommendation would be 15 months from decision paper. This covers all the dates. If traders wanted to align prior to this date then they could as long as all distributors were also able to.
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.
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?	Simply Energy does not agree with the Preferred Option, our preference is Option 4. All files sent should be as per format, the "reject" option when a Distributor's file fails this format is a very good option. One of the biggest issues currently faced with EIEP5A is files that they are not consistent with the prescribed format. We would also welcome additional notifications when a switch is in progress or a withdrawal is progressing. One location for notifications is preferable.
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.
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	No comment.

	dedicated web services for planned outage information or a new version of icp_details with outage information appended? See Appendix C for further information.	
13	Do you have any comments on the draft Code changes proposed for Schedule 11.1 reflecting Option 4?	No comment.
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.	12 months would be adequate, six months I don't believe would be achievable across the industry given the amount of change needed to occur. Very few distributors are currently using EIEP5A.
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?	No comment.
18	Do you agree with the objectives of the proposed amendment? If not, why not?	No comment.
19	Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?	No comment.
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.	No comment.
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.	No comment.

22	Do you agree the Authority's proposed amendments comply with section 32(1) of the Act?	No comment.
23	Do you have any comments on the drafting of the proposed amendment for Option 4?	Our preferred option is Option 4. We accept the proposed amendment.