

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

Submitter	The Embedded Network Company
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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 of mandating RM replacement normalised. This methodology is our preferred option as we will only have to support one reporting method. Our assumption is the traders will align their submission volumes with the RM submissions.
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.	Tenco is in the process of upgrading its IT systems. No additional system cost in developing for RM replacement normalised during this project.
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	We noted the 1 April 2020 was identified as it aligned with distributor

	<p>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.</p>	<p>price changes for cost reflective pricing. Tenco manage many participant codes and our price changes usually occur one month after the local network to allow us to mirror the local network and provide sufficient notice to market. I'd suggest embedded networks transition inline with their price changes.</p> <p>We would require retailers to provide meter readings for each ICP, meter, register they supply up to the changeover date and inline with their RM forward estimates.</p> <p>I don't think we should underestimate the work required by some retailers to support the transition across all local distributors and embedded networks.</p>
7	<p>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.</p>	<p>No comment</p>
8	<p>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?</p>	<p>No comment</p>
9	<p>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.</p>	<p>No comment</p>
10	<p>Do you have any comments on the draft mark ups of EIEP5A reflecting Options 1, 2 and 3?</p>	<p>No comment</p>
11	<p>Do you have any comments on the draft registry functional specification?</p>	<p>No comment</p>
12	<p>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</p>	<p>No comment</p>

	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.	No Comment
15	Do you agree with the costs and benefits of the proposed amendments? If not, why not?	Yes
16	What are your costs associated with making RM normalised the single standard reporting methodology for EIEP1? Please provide details.	We already have an IT project underway and RM replacement normalised will be included.
17	Are there any other costs or benefits we have not identified?	Tenco currently uses its own obtained meter readings each month to bill traders for UoS. Antidotally we have observed volatile EIEP1 submissions from most traders. As a result, we have now engaged Ampli as a data analytics company to provide revenue assurance reporting to better understand the impacts of this change. We might need to establish a process where we scale to gateway NSP or estimate R0 invoices and replace with trader provided EIEP1 from R3 onwards.
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
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	Yes

	statutory objective in section 15 of the Electricity Industry Act 2010.	
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?	No comment