

18 December 2018

Submissions
Electricity Authority
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UNISON SUBMISSION – SECOND CONSULTATION ON ELECTRICITY INFORMATION EXCHANGE PROTOCOLS (EIEPS)

Unison welcomes the opportunity to provide a submission to the Electricity Authority (Authority) on the consultation paper, *Second Consultation on Electricity Information Exchange Protocols (EIEPs): A proposal for a single standardised reporting methodology for EIEP1 and delivery mechanism for EIEP5A*.

Unison has previously submitted on the first consultation on the Operational Review of EIEPs¹. In that paper we set out our support for the Authority's approach to use 'Replacement RM Normalised' as the reporting methodology for EIEP1. We remain supportive of this approach in the current consultation as it allows for alignment with the market reconciliation process. This assists distributors with the analysis of network consumption and losses for example.

Unison is also supportive of the mandated delivery mechanism for EIEP5A, planned service interruptions. The proposal will ensure that any affected customers will receive planned outage notifications, regardless of whether they have switched traders after interruption notices have been issued.

Unison's responses to the consultation questions are attached to this letter. For any questions on the points raised in this submission, please Roanna Vining, Senior Regulatory Affairs Advisor, by phone (06) 873 9329 or email Roanna.Vining@unison.co.nz.

Yours sincerely



Nathan Strong

GENERAL MANAGER, BUSINESS ASSURANCE

¹ Unison (22 September 2017). *Unison Submission – Operational Review of EIEPs*.

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

Submitter	Unison Networks Limited
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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 – it’s simple and everything aligns with the market reconciliation process. This assists with analysis of network consumption, losses etc.
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.
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.	We estimate the cost of systems changes and internal development to be approximately \$50K. Change is needed to develop the functionality of the Gentrack system to be able to process and produce the washup files, as well as changes to facilitate the invoicing detail through the financial system.
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, these changes make sense.

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.	Yes, we consider this timeframe to be appropriate.
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 with this.
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, Unison supports the Authority's preferred choice: 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.	We expect these costs to be minimal.
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.	Unison believes it makes sense to develop dedicated, fit for purpose web services for planned outage information. Appending outage information to the existing file could unnecessarily complicate the file and compromise its primary purpose.
13	Do you have any comments on the draft Code changes proposed for Schedule 11.1 reflecting Option 4?	No
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, we believe 6-12 months is sufficient lead time to implement changes.

15	Do you agree with the costs and benefits of the proposed amendments? If not, why not?	Yes, these seem balanced.
16	What are your costs associated with making RM normalised the single standard reporting methodology for EIEP1? Please provide details.	As noted in response to question 4 above, we estimate there to be \$50K worth of system and internal development costs associated with implementing the RM normalised reporting methodology for EIEP1.
17	Are there any other costs or benefits we have not identified?	Not that we are aware of at this time.
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 statutory objective in section 15 of the Electricity Industry Act 2010.	Yes.
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?	Yes.
23	Do you have any comments on the drafting of the proposed amendment for Option 4?	No.