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Electricity Authority
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Submission on the Second Consultation on EIEPs

Introduction

1. This is Vector Limited's (Vector) submission on the Electricity Authority's (the Authority) second consultation paper on its proposed changes to the electricity information exchange protocols (EIEPs), issued on 20 November 2018.
2. The Authority proposes a single standardised reporting methodology for EIEP1 (detailed ICP billing and volume information) and a delivery mechanism for EIEP5A (planned service interruptions). We set out below our comments on these proposals.
3. No part of this submission is confidential. Vector's contact person for this submission is:

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Single standardised reporting methodology for EIEP1

4. Vector supports the Authority's preferred option for EIEP1 (Option 1), which is a single standardised replacement RM normalised reporting methodology for both interposed and conveyance arrangements.
5. We agree that Option 1 will deliver the biggest efficiency gain for existing traders and distributors as maintenance and future replacement is only needed for one methodology. It will reduce costs and remove a barrier to market entry as traders only need to develop one methodology.
6. We also agree with the proposed minimum lead time of 12 months from the date the Authority issues a decision to the adoption of the new reporting methodology.

Delivery mechanism for EIEP5A

7. Vector agrees with the Authority's preferred option for EIEP5A (Option 3), in principle, and subject to the appropriate privacy and security settings. This option involves the registry: 1) receiving notifications of planned service interruptions from distributors, 2) processing the notifications and indicating outages against the ICP, then 3) notifying retailers and gaining retailers if a switch is initiated after the notification is sent.
8. In our view, Option 3 provides greater choice for distributors, traders, and metering providers over Options 1 and 2, and avoids having to create a new registry maintenance file as proposed under Option 4. Option 3 provides: 1) distributors the choice to upload files to the registry EIEP transfer hub or registry SFTP, 2) traders the choice to have notification files sent to their EIEP inbox in addition to the registry SFTP, and 3) metering providers the choice of having EIEP5A notification files delivered to their registry SFTP.

9. We suggest that the Authority issue a practical implementation guide on, and/or conduct a trial of, its preferred delivery mechanism to provide distributors and traders the opportunity to provide feedback on its impact on their operations.
10. We further suggest a lead time of at least 12 months, rather than the proposed six to 12 months, before implementation to provide the above parties sufficient preparation time to ensure a smooth transition to the new arrangements.

Concluding comment

11. We are happy to discuss with the Authority any aspects of this submission.

Yours sincerely
For and on behalf of Vector Limited

A handwritten signature in blue ink, appearing to read "Richard Sharp".

Richard Sharp
Head of Regulatory and Pricing