

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

Submitter	WEL Networks
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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, for efficiency a single reporting methodology is preferred. The RM normalised is our preference due to the ability to refer to RM files as a check, the ability to check file submission volumes to GXP and easier analysis of UFE.
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?	Do not agree or disagree and as we do not have NHH ICP's on conveyance.
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 currently accept full replacement files, we cannot currently process partial replacement files. If we had to accept partial replacements an approximate cost is \$50k to upgrade the billing system to handle them, we see no benefit in having to receive partial replacements, only additional administration and cost to our customers.
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?	With regards to our answer to question 4, an addition to business requirement 12 for the EIEP, where a participant must be capable of receiving an X file (add where both parties agree).

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.	System changes can take a significant period of time to be successfully implemented. Individual participants will be best able to advise on their circumstances.
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.	A single delivery mechanism is preferred, currently we email and send via the EIEP transfer hub as one retailer on our network was unable to receive the files via the SFTP. This adds work and also confusion for ourselves and retailers.
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?	Our preference is for a single delivery mechanism. Given the proposed registry development costs we agree with 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.	Minimal costs, some staff time and testing.
10	Do you have any comments on the draft mark ups of EIEP5A reflecting Options 1, 2 and 3?	n/a
11	Do you have any comments on the draft registry functional specification?	n/a
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.	Preference is for the option which has the least cost associated.
13	Do you have any comments on the draft Code changes proposed for Schedule 11.1 reflecting Option 4?	n/a
14	Do you agree that six to 12 months is sufficient lead time	These timeframes would be acceptable to WEL.

	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.	
15	Do you agree with the costs and benefits of the proposed amendments? If not, why not?	Yes, they seem reasonable.
16	What are your costs associated with making RM normalised the single standard reporting methodology for EIEP1? Please provide details.	n/a, we already accept them. However if we are required to also accept partial replacement files this would cost approximately \$50k.
17	Are there any other costs or benefits we have not identified?	n/a
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, based on the information given.
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?	n/a