Electricity Information Exchange Protocols (EIEPs)

Date for EIEP5A to be prescribed; and mandated delivery mechanism for EIEP5A

Decision

11 April 2023

Executive summary

This paper outlines decisions relating to:

- a date for making EIEP5A (planned service interruptions) a regulated EIEP under clause 2 of schedule 12A.2; and

- the delivery mechanism for EIEP5A (planned service interruptions),

including discussion on the main themes from submissions, and the detail and rationale for our decisions.

The Authority has decided to prescribe EIEP5A (planned service interruptions) under clause 2 of schedule 12A.2 from **1 April 2024**. This date is consistent with the implementation date of the delivery mechanism, although the Authority encourages distributors to use EIEP5A sooner than this date if possible.

The Authority has also decided to implement a mandatory delivery mechanism consistent with Option 3 in the consultation paper that, in summary, provides for:

(a)   MEPs to be able to elect to receive EIEP5A files

(b)   distributors to deliver EIEP5A files via the registry, either the EIEP transfer hub with recipient identifier RGST or the registry SFTP

(c)   centrally performed validations of header (HDR) and detail (DET) lines by the registry

(d)   customisation of the content of output files to reflect trader/MEP preferences (or defaults) set out on each registry user's supervisor screen

(e)   functionality to provide additional notifications to traders (if they have elected to receive only the ICPs they are responsible for) and MEPs as the gaining trader/MEP for switches completing between the initial advice and start date of the planned service interruption (including backdated switches and switch withdrawals)

(f)   displaying current and impending planned service interruption information via the ICP summary page and a new web services interface dedicated to planned service interruption information

The Authority has decided to set an implementation date of **1 April 2024** for the full functionality to be available in the registry. This will enable participants time to implement their own functionality to send and receive EIEP5A files to/from the registry or EIEP transfer hub if required. The Authority notes:

- there is already existing functionality using the EIEP transfer hub (with the target trader's participant identifier as the recipient identifier) to transfer EIEP5A files, which can be used prior to the implementation date. The only change needed on **1 April 2024** would be to change the recipient identifier to 'RGST'

- the functionality to display outages against the ICP in the registry and the webservice to provide automated M2M information to retailers is an optional service, and does not need to be implemented by 1 April but can be implemented when ready.

Contents

1   Background

1.2   EIEPs provide standardised formats and associated business requirements that support the low cost, standardised, and reliable exchange of information between:

   (a)   traders and distributors

   (b)   traders and their field services providers for non-network related customer faults and service requests

   (c)   retailers and consumers (or their authorised agents)

   (d)   retailers and any person who requests generally available retail pricing plan information.

1.3   The Authority consulted on and issued a decision paper to make changes to EIEPs 1-12 to add clarity and consistency to the format and business requirements, and to address a backlog of issues and alignment of terminology. These changes came into effect on 1 October 2019.

1.4   As a result of submissions, the Authority decided it could not make decisions on two matters without further consultation, being:

   (a)   the preference of distributors and traders for a single standardised EIEP1 reporting methodology, and for that to be replacement RM normalised, at least for interposed arrangements

   (b)   a delivery mechanism for EIEP5A files (planned service interruptions).

1.5   The Authority then issued a second consultation paper *Second consultation on electricity information exchange protocols (EIEPs) – Proposal for a single standardised reporting methodology for EIEP1 and delivery mechanism for EIEP5A* on 20 November 2018, seeking feedback on these two matters.

1.6   The first of the two matters (single standardised EIEP1 reporting methodology) was decided in a decision paper dated 1 November 2019 which resulted in a requirement to only use replacement RM normalised for both interposed and conveyance arrangements by 1 April 2021.[1]

1.7   This paper provides the detail and rationale for the Authority's decisions regarding the second of the two matters, the delivery mechanism for EIEP5A files (planned service interruptions) from distributors to traders and MEPs, and the date for EIEP5A to become mandatory.

2   Existing arrangements for planned service interruptions

2.1   For each distribution network either the distributor or trader is responsible for notifying affected customers of planned service interruptions.

---

[1] https://www.ea.govt.nz/development/work-programme/operational-efficiencies/second-consultation-on-electricity-information-exchange-protocols-eieps/development/.

2.2   Distributors provide planned service interruption information to traders (unless otherwise agreed[2]) in EIEP5A files, enabling traders to:

(a)   record details in their customer information systems

(b)   notify affected customers where required to do so by the relevant use of system agreement.

2.3   As a result of the 2017 operational review of EIEPs the Authority decided[3] to make EIEP5A a regulated EIEP but did not establish an effective date pending the second consultation paper[4] and this decision.

3   Authority decisions on delivery mechanism

Consultation proposal

3.1   The Authority proposed four options for delivery of EIEP5A files as an alternative to the status quo (email), summarised below:

(a)   Status quo: delivery via email (as the default), or EIEP transfer hub where both parties have agreed

(b)   Option 1: distributors upload EIEP5A files to the EIEP transfer hub with the recipient participant identifier of RGST, and the Registry delivers EIEP5A files to:

(i)   traders via the registry EIEP transfer hub with content reflecting the trader's preferences (and defaults) for files to include all ICPs or only ICPs the trader is responsible for, and include or exclude a description (DES) row

(ii)   MEPs[5] via the registry SFTP reflecting the MEP's preferences (and defaults) for files to include or exclude a description (DES) row

(c)   Option 2: as for Option 1, except distributors would be able to choose to upload EIEP5A format files to the EIEP transfer hub or registry format files (including the standard registry header (HDR) line) to the registry SFTP using the standard batch interface

(d)   Option 3 (Authority's preferred option): as for Option 2, except traders and MEPs would be able to elect to receive EIEP5A files via the EIEP transfer hub or registry SFTP, or both

(e)   Option 4: EIEP5A becomes a registry maintenance file in its entirety, with the maintenance file containing similar information to EIEP5A but with the standard registry header (HDR) line inserted before the EIEP5A header (HDR) line.

3.2   The following features are common to options 1, 2, 3 and 4:

---

[2] For example, the parties may agree in the relevant use of system agreement that the distributor is not required to provide planned service interruption information to traders where the distributor is required to notify all affected consumers of planned service interruptions and takes responsibility for receiving and managing all service interruption calls from consumers.

[3] EIEPs 2017 operational review decision paper dated 2 October 2018.

[4] EIEPs second consultation paper proposal for a single standardised EIEP1 reporting methodology and delivery mechanism for EIEP5A dated 20 November 2018.

[5] MEPs may elect to not receive or receive (the default) EIEP5A files, and if they elect to receive EIEP5A files they will contain only ICPs the MEP is responsible for.

(i)   registry to perform validations on header (HDR) and detail (DET) lines[6]

(ii)   participants able to query planned service interruption information via the registry ICP summary page and web services interface

(iii)   where the trader elects to receive files containing only ICPs it is responsible for, additional notifications as the gaining trader for trader switches (including backdated switches and switch withdrawals) that complete between the initial notification and date of the planned service interruption

(iv)   where the MEP elects to receive files, additional notifications as the gaining MEP for MEP switches (including backdated switches and switch withdrawals) that complete between the initial notification and date of the planned service interruption.

3.3   the Authority sought feedback on the four options, including:

(a)   whether submitters agreed 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, or otherwise the reasons why not (Question 7)

(b)   if submitters agreed with (a), did submitters also agree with the Authority's preferred Option 3, or otherwise which option was preferred and why (Q8).

3.4   The Authority also asked:

(a)   if we mandated a delivery mechanism as for Options 1 to 4, what system costs would submitters occur for each option (Q9)

(b)   submitters to provide any comments on the draft mark-ups of EIEP5A reflecting Options 1, 2 and 3 (Q10)

(c)   submitters to provide any comments on CR-1208 (draft registry solution proposal and Appendix A functional specification amendments) (Q11)

(d)   if the proposal proceeds and a web services interface is provided for planned service interruption information, would submitters prefer a new dedicated web services for planned service interruption information or a new version of 'icp_details' with planned service interruption information appended (Q12)

(e)   submitters to provide any comments on the draft Code changes proposed for Schedule 11.1 reflecting Option 4 (Q13)

(f)   if submitters agree that 6 to 12 months from when the decision is issued would be sufficient lead time to implement the proposed solution, or if not what would submitters consider to be a more appropriate implementation date and lead time, and why (Q14).

Submissions and Authority's consideration

3.5   This section summarises submitters' comments and the Authority's responses.

---

[6] Proposed registry validations which would apply to all options are detailed in CR1208 Registry Format (solution proposal and Appendix A functional specification amendments).

3.6 **Mandating a delivery mechanism (Q7)**

3.7 There were 18 responses to Q7, with 16 submitters in agreement with mandating a delivery mechanism for EIEP5A.

3.8 One distributor submitter preferred the status quo (email), noting that there would be additional costs associated with the other options.

3.9 Another distributor considered mandating a delivery mechanism was not necessary, although it is opposed to the status quo (email) and said that if a delivery mechanism is mandated it should be the EIEP transfer hub which was designed for EIEP file transfers.

3.10 Authority's response: Submitters have indicated overwhelming support for mandating the delivery mechanism.

3.11 **Preferred delivery option (Q8)**

3.12 There were 19 responses to Q8, with 12 of the submitters (6 of 9 trader submitters, 6 of 10 distributors) in agreement with the preferred Option 3.

3.13 One trader submitter would prefer a hybrid of Options 3 and 4 without the need to create a new registry maintenance file format or interface, and made the following comments:

   (a) EIEP5A format be retained and registry functionality further developed to suit the planned service interruption function

   (b) focussing on creating a web service interface for those with the capability or desire to interface via this mechanism will enable all parties to follow a standardised path and incentivise a move towards close to real time notifications

   (c) second preferred option is Option 4 as this would serve participants and customers best in the long term even though participants may incur additional implementation costs.

3.14 Authority's response: Option 3 would appear to deliver the essential elements of functionality sought by this trader – retention of EIEP5A format, no new registry maintenance file or interface, registry functionality further developed to suit the planned service interruption function, and a web services interface for planned service interruption information.

3.15 Two trader submitters who prefer Option 4 commented:

   (a) one of the biggest issues is that EIEP5A files are not always compliant with the prescribed format

   (b) Option 4 incorporates centrally performed validations of EIEP5A files

   (c) Option 4 avoids complexities and costs of multiple delivery options in Options 1 to 3, these complexities will complicate industry testing processes and introduce uncertainty more generally.

3.16 Authority's response:

   (a) the validations outlined for Option 4 will apply to all four options.[7] The consultation paper may not have made this clear.

---

[7] Proposed registry validations which would apply to all options are detailed in CR1208 Registry Format (solution proposal and Appendix A functional specification amendments).

(b)   with the 2 October 2018 decision to make EIEP5A a regulated EIEP (with only the effective date to be determined)[8], any non-compliance with the EIEP5A format will be a breach of the Code and therefore should no longer be an issue from the effective date

(c)   multiple delivery options are intended to minimise participant costs, allowing participants to choose the most cost-effective delivery channel and content of EIEP5A files to suit their business model and processes.

3.17   Of the three distributor submitters that did not prefer Option 3:

(a)   one distributor submitter prefers Option 1 because it closely aligns with its existing system and processes

(b)   two distributor submitters have no preference, however both opposed Option 4 on the basis it will impose more costs on participants.

3.18   Other comments included:

(a)   the costs associated with a move from emailing files to traders to uploading those same files to the EIEP transfer hub would be minimal

(b)   although Option 4 would appear to be the best solution, the implementation time and costs will be greater due to the need for the completely new registry file along with enhancements to the registry functionality. Therefore, the benefits of Option 4 are unlikely to exceed the costs that would be incurred by the industry over the implementation of Option 3 along with mandating the use of EIEP5A

(c)   distributors would be able to choose to upload EIEP5A files to the EIEP transfer hub or to the registry SFTP

(d)   Option 3 provides greater choice for distributors, traders, and MEPs over Options 1 and 2, and avoids having to create a new registry maintenance file as proposed under Option 4

(e)   in implementing a mandated delivery mechanism, the ease and uncomplicated nature of the current process needs to be weighed up against the benefit of the process being mandated

(f)   oppose the introduction of Option 4 as the cost of implementing that option would, in our view, far exceed any potential benefit that would be achieved and could increase the risk of missed customer notifications due to significant changes to the current information transfer process

(g)   Option 3 the best option for distributors and retailers to match existing processes, keeping change costs to a minimum.

3.19   Authority's response: submitters have indicated overwhelming support for mandating a delivery mechanism consistent with Option 3.

3.20   System development costs for Options 1 to 4 (Q9)

3.21   There were 18 responses to Q9, with 8 submitters stating there would be no cost, or the cost would be minimal to implement Options 1 to 3.

---

[8] EIEPs 2017 operational review decision dated 2 October 2018

3.22   The Authority understands several submitters have already automated processes, while others have manual processes and expect to incur additional costs if they decide to automate their processes in the future.

3.23   For Option 4, submitter responses were varied, including:

   (a)   least costly of all the options but modest overall

   (b)   not quantified but likely significant

   (c) $50k-$100k

   (d) $20k-$40k although have not scoped in detail

   (e)   additional cost compared to other options ($5k-$10k) and do not believe it is viable.

3.24   Authority's response:

   (a)   submitters have indicated the costs they expect to incur to implement Option 3 are minimal

   (b)   we note that for both the EIEP transfer hub and registry SFTP participants have three options. They can choose to:

      (i)   permanently maintain manual processes; or

      (ii)   temporarily maintain manual processes and include additional automation integrated with other changes being made to their systems at a later date; or

      (iii) incur additional implementation costs to automate their processes and reduce ongoing operational costs.

Summary of Authority's decisions on mandating a delivery mechanism

3.25   The Authority has decided to:

   (a)   mandate the delivery mechanism for EIEP5A planned service interruption information and prescribe EIEP5A from **1 April 2024**

   (b)   implement a solution consistent with Option 3 that in summary provides for:

      (i)   MEPs to be able to elect to receive (or stop receiving) EIEP5A files

      (ii)   distributors to deliver EIEP5A files to traders/MEPs via the registry (either the EIEP transfer hub with recipient RGST or registry SFTP) with the preferred channel decided by each distributor

      (iii) centrally performed validations of header (HDR) and detail (DET) lines by the registry

      (iv)   customisation of the content of output files to reflect trader/MEP preferences (or defaults) set out on each registry user's supervisor screen

      (v)   functionality to provide additional notifications to traders (if they have elected to receive only the ICPs they are responsible for) and MEPs as the gaining trader/MEP for switches (including backdated switches and switch

withdrawals) completing between the initial advice and start date of the planned interruption[9]

(vi) display current and impending planned service interruption information via the ICP summary page and a new web services interface dedicated to planned service interruption information

3.26 These decisions are reflected in the marked up and clean versions of EIEP5A v11.2 and CR-1208 EIEP5A Registry Format (Solution Proposal and Appendix A Functional Specification Amendments).

4 Authority decisions on EIEP5A file format

Consultation proposal

4.1 The consultation provided mark-ups of proposed changes to EIEP5A reflecting options 1 to 3 and sought feedback in Q10.

Submissions and Authority's consideration

4.2 There were 19 responses to Q10, with 14 submitters stating no comment or n/a.

4.3 Other responses received include:

(a) establish a technical group to assess and refine the requirements once the preferred option has been determined

(b) this technical group would also assist with planning and project timelines along with any impacts to participants, testing, and implementation

(c) clarity is required on what is to be included in the 'sender' and 'sent on behalf participant identifier' fields, specifically how the network identifier must be included in one of the two fields

(d) EIEP5A does not allow for the origin of the outage. Not all outages begin with the distributor, it is possible for an MEP or third-party contractors to initiate an outage and ask the distributor to initiate the EIEP5A process, there is no clear way to signal this to the traders

(e) 'feeder' field:

(i) it is not clear if this information is useful to a trader or MEP

(ii) it is not possible to put useful information here for the trader. The field should be increased to 50 characters or removed

(iii) the feeder and transformer supplying an ICP can be transient and may depend on the switching configuration at the time. The configuration may also change during the outage

(f) timeframe in clause 11.1[10] is unnecessary if all consumers are advised of the outage and agree it can proceed on short notice. Imposing a 4 days' minimum

---

[9] For the purposes of additional notifications 'start date of the planned service interruption' means start date or alternate date (whichever is later) of interruption 1 if the event includes a single service interruption, or start date or alternate date (whichever is later) of the final interruption if the event includes multiple service interruptions

[10] Should be clause 22 in the EIEP5A business requirement section, it was incorrectly referenced by the submitter.

notice timeframe can introduce inefficiency into the process by precluding work that was possible, at a time convenient for all

(g)   there are four communication type codes (PLS, PLI, PLR, and PLC) specified in table 3 with additional business rules on required notification lead times for each in clause 22 of the business requirements section:

(i)   the lead time for the revision code PLR is specified as seven business days in clause 22(c) while the lead time for the cancellation code PLC is four business days. In both cases these lead times should be clarified as only applying where the initial advice code was a PLS code (trader to notify affected customers)

(ii)   where the initial advice code was a PLI code (distributor has notified affected customers) a lead time of less than four business days should be allowed for the PLR and PLC codes as the minimum lead time for sending the initial PLI file is only four business days.

(h)   suggest 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.

4.4   Authority's responses:

(a)   the 2017 operational review of EIEPs resulted in a decision on final amendments to EIEP5A including making it a regulated EIEP, however the decision did not set an implementation date pending further consultation on the delivery mechanism

(b)   following this second consultation we can now make changes to EIEP5A that are related directly to the proposal for a mandated delivery mechanism, but we cannot make any other changes as they may impact participants currently using EIEP5A

(c)   if we consider that any format changes proposed by submitters have merit, we will include them on a list for future consultation

(d)   **Technical group**: we do not agree it is necessary to establish a technical group to refine requirements once the preferred option has been determined as the Standing Data Formats Group (SDFG) is the technical group responsible for assisting the Authority to make decisions on EIEPs and was consulted as part of the operational review of EIEPs

(e)   **'Sender' and 'Sent on behalf of participant' fields**: These fields are common to all EIEPs. Several submitters have suggested more clarity would be useful regarding these fields, including that the network participant identifier must be included in one of the two fields:

(i)   we consider there is sufficient clarity how these fields must be populated, and that the network participant identifier must be included in one of the two fields

(ii)   validation rules state:

1.   'Sender' is "Name of sending party. Participant identifier to be used if the sender is a participant."

2.   'Sent on behalf of participant' is "Participant identifier of party on whose behalf data is provided. Mandatory if sender is not a participant."

(iii)   the 'Sender' may be the distributor or distributor's agent

(iv)   if the sender is the distributor then 'Sender' in the file and file name must be the distributor's network participant identifier, and 'Sent on behalf of participant' can only be Null

(v)   if the sender is the distributor's agent, then 'Sender' must be the agent's name or its participant identifier if it is a participant, and 'Sent on behalf of participant' must be the distributor's network participant identifier

(vi)   we acknowledge that an agent may be a non-participant with an approved non-participant identifier with a prefix of "3" (as used for transfer hub identifiers), and note that the registry will accept a file submitted by an agent using its non-participant identifier in the file name provided the non-participant identifier is known to the Registry, and provided also that the agent is the owner of the outbox into which the EIEP file has been placed[11]

(vii)   we will add 'non-participant identifier' to the list for future consultation on EIEP5A, but in the meantime will provide more details around this in CR-1208 Registry Format[12] given a non-participant identifier that is known to the registry could be used without amending EIEP5A.

(f)   **Causer of a planned service interruption**: it is not relevant to traders and MEPs whether the distributor, MEP or third-party contractor has been the causer of a planned service interruption. If a distributor wants to convey that information, they could use the optional 'description' (DES) row

(g)   **'Feeder' field**: this is out of scope as it is not associated with the delivery mechanism. We note that the field was retained as a Conditional field following the 2017 operational review of the EIEPs[13] to avoid the need for traders to make system changes if it was removed

(h)   **Alternative notice periods**: consistent with allowing for alternative notice periods where agreed between the parties (clause 22, now 24), we acknowledge it may be appropriate to allow for reduced notice to traders where the distributor is responsible for notifying affected consumers and agrees a shorter notice period with every affected consumer. We will add this to the list of potential changes for future consultation

(i)   **PLR and PLC codes**: while it may not be explicit that the notice periods for files with communication type codes PLR and PLC only apply where traders are required to notify affected customers, we consider it is implicit given the sequence of minimum notice periods. However, we will add this to the list of potential changes for future consultation, i.e. to consider inserting "PLS" in the description of the PLR communication type code in Table 3.

4.5   In addition to the above responses to submitters' comments, the Authority will make the amendments described in the "Authority's decision" section below to reflect Option 3 being the mandated delivery mechanism and/or ensure clarity.

---

[11] More detail is provided in the section outlining the Authority's decisions on CR-1208 Registry Format

[12] More detail is provided in the section outlining the Authority's decisions on CR-1208 Registry Format

[13] EIEPs 2017 operational review decision paper dated 2 October 2018

Summary of Authority's decisions on EIEP5A

4.6 The Authority has decided to amend EIEP5A version 11.1 to:

(a) **Application**:

    (i) add new (b) "*allows MEPs to receive planned service interruption information*"

    (ii) add new (c) "*specifies the delivery mechanism for planned service interruption information*"

(b) **Participants**: add 'registry' and 'MEPs'

(c) **Description of when this protocol applies**: add "*MEPs may also receive planned service interruption information, but only for ICPs for which they are currently responsible*"

(d) **Business requirements 1 to 5**:

    (i) amend to ensure the business rules describe the key elements of Option 3 as the mandated delivery mechanism and remove any reference to the status quo (email) and Options 1-2

    (ii) amend the default for registry to trader files to the EIEP transfer hub[14]

    (iii) note that traders and MEPs can elect to receive files via either the EIEP transfer hub or registry SFTP, or both, according to their preferences (or defaults) as set out in the Supervisor screen

    (iv) amend the business requirement for the registry to provide additional notifications to gaining traders/MEPs (where the initial files include only ICPs the trader/MEP is responsible for) to ensure clarity regarding the cut-off date for single and multiple service interruptions by adding "….*with a completion date between the initial notification and start date of the planned service interruption. For the purposes of additional notifications, 'start date of the planned service interruption' means the start date or alternate date (whichever is later) of interruption 1 if the event includes a single service interruption, or of the final interruption if the event includes multiple service interruptions*"

(e) **Recipient participant identifier**: minor amendments to add clarity for registry to trader/MEP files

(f) **File naming convention**: amend current example (distributor to registry) and add new example (registry to trader/MEP) to add clarity

(g) **List for future consultation**:

    (i) consider providing explicitly that 'Sender' in the HDR and file name may be a valid non-participant identifier known to the registry

    (ii) PLR code: consider inserting "PLS" in the description of the PLR communication type code in Table 3.

---

[14] Reflects our response to several submitters' comments (refer also Q7) that the EIEP transfer hub should be the default delivery channel for trader files rather than the registry SFTP because it is more likely to match any existing processes and is aligned with other EIEP delivery.

4.7   The final decisions on EIEP5A are reflected in the marked up and clean versions of EIEP5A v1.2.

5   Authority decisions on CR-1208 EIEP5A Registry Format

Consultation proposal

5.1   The consultation provided a draft of CR-1208 EIEP5A Registry Format (Solution Proposal and Appendix A Functional Specification Amendments) reflecting the preferred Option 3 and sought feedback in Q11

Submissions and Authority's consideration

5.2   There were 18 responses to Q11, with 14 submitters stating no comment or n/a.

5.3   Other responses included:

(a)   due to the technical nature of the issue, a technical group should be established (or an existing appropriate group such as the SDFG) to assess and validate the technical details

(b)   the default delivery destination should be the EIEP hub rather than the registry SFTP as this would more likely match existing processes and is aligned with other EIEP delivery

(c)   request for additional information on what will be validated by the registry

(d)   a concern regarding the business requirement that the distributor event number must be unique and that the entire file must be rejected if distributor event number is reused after the planned service interruption has completed. Submitter notes the wording allows for a PLR to use an existing distributor event number and asks if this is intended or is it the intention to specifically allow the resending of a PLI (e.g. if it should have been a PLS)?

(e)   not sure that [distributor] event [number] is the correct term given 'event' has a specific meaning in the registry functional specification in chapter 1.6 (such as the unique reference applied to each registry update and visible in files such as PR-010 and PR-030). Not sure the reference number for an outage plan is an 'event' in that context. Suggests 'planned interruption reference' may be more appropriate.

(f)   Web services:

(i)   typo "logo" should be "logon"

(ii)   draft states "if no ICP supplied, impending planned service interruption information relevant to the requesting participant". If the participant is a large retailer with a national presence, not providing the ICP number would return huge amounts of entries. This is a web service, so response time and volume are important. It may be useful for reducing timeouts and bandwidth to be able to scope this down by date range and/or distributor code.

(iii)   one of the proposed filters 'outage identifier' not defined, may be intended to be 'distributor event number'

(iv) 'distributor event number' is not unique as it may be used by different distributors, so needs to be combined with distributor code (network participant identifier) to present a false positive match against the same distributor event number on another network. Using this as a filter also assumes the distributor event number is known by the trader

(g) Display ICP impending planned service interruption information: if showing PLR readers cannot see who is responsible for telling the consumer, only that the details have changed, i.e. difference between PLI and PLS can no longer be seen. What you have is four options: (i) PLI, (ii) PLS, (iii) revised-PLI, (iv) revised-PLS

(h) All planned service interruptions for ICP (indicative) screen mock-up: include column for PLS/PLI origin

(i) Page 7 field sizes: same comment as made earlier about feeder/transformer: (i) what problem is this trying to solve; and (ii) char 20 not big enough to provide anything meaningful anyway.

5.4 Authority's responses:

(a) **Technical group**: Standing Data Formats Group (SDFG) is the technical group responsible for assisting the Authority to make decisions on EIEPs, and was consulted as part of the operational review of EIEPs

(b) **Default delivery destination**: the default delivery destination for registry to trader EIEP5A files should be the EIEP transfer hub rather than the registry SFTP as this would more likely match existing processes and is aligned with other EIEP delivery. Accordingly we will amend EIEP5A and CR-1208 EIEP5A Registry Format to reflect this

(c) **Registry validations**: CR-1208 EIEP5A Registry Format (in particular SI-020) provides detailed information regarding the validations that will be performed (or not performed) by the registry, however we will make some minor amendments to ensure clarity. The proposed validations include:

(i) if information provided in either header (HDR) line fails validation the entire file must be rejected with an error stating failure is due to an error in the HDR record

(ii) if all DET lines fail validation the registry must reject the entire file

(iii) if at least 1 DET line passes validation the registry must load the interruption information for all valid DET lines to the registry

(iv) SI-020 states that "Sent on behalf of participant" will not be validated by the registry, however this will be amended to ensure that either the 'Sender" or 'Sent on behalf of participant' is a valid network participant identifier. We will amend the validations to require that:

1. if 'Sent on behalf of participant' is Null (i.e. distributor has submitted the file to the registry) then 'Sender' must be a valid network participant identifier

2. if 'Sent on behalf of participant' has a participant identifier (i.e. Sender is an agent) it must be a valid network participant identifier

(d) **Distributor event number must be unique**: it is intended that the registry must validate that the distributor has used a unique distributor event number (for that

distributor) for each new planned service interruption (PLS, PLI), and that a PLR or PLC file has used an existing distributor event number for an uncompleted planned service interruption

(e) **Distributor 'event' number**: it is out of scope to replace "event" with an alternative such as "reference", nevertheless the context is quite clear for use of distributor event number

(f) **Web services**:

    (i) typo "logo" will be replaced by "logon"

    (ii) if no ICP supplied: the filter options need to be appropriate for a web service application and we will amend to:

        1. ICP identifier; or

        2. distributor event number; or

        3. network participant identifier

    (iii) although distributor event number may not be unique unless combined with network participant identifier, there is a low probability that the same distributor event number might be used concurrently for uncompleted planned service interruptions by more than one distributor

(g) **Display of ICP current and impending planned service interruption information should include who is responsible for notifying the customer**: in the context of the purpose of the 'ICP summary page' it does not matter who is responsible for notifying the customer as it is only intended to show whether there is a current or impending planned service interruption for the ICP (which will reflect inclusion of the ICP in a PLS, PLI or PLR file)

(h) **All planned service interruptions for ICP (indicative) screen mock-up**: in the context of the purpose of this page it does not matter who is responsible for notifying the customer (i.e. whether PLS or PLI)

(i) **SI-020 'feeder' field size**: this is out of scope as it has is not associated with the delivery mechanism. We note that the field was retained as a Conditional field following the 2017 operational review of the EIEPs to avoid the need for traders to make system changes if it was removed.

Summary of Authority's decisions on CR-1208 EIEP5A Registry Format

5.5 the Authority has decided to:

(a) **Minor amendments**: make minor amendments to ensure clarity and consistency

(b) **Agent arrangements**: provide more detail around agent processes, including:

    (i) use of a valid participant identifier or non-participant identifier[15] that is known to the registry

    (ii) acknowledgements and notifications will be returned to:

---

[15] Non-participant identifiers known to the registry are the approved transfer hub identifiers with a prefix of '3'

1. agent (provided the agent has used a valid participant identifier or non-participant identifier known to the registry as 'sender' in the file name); and

2. distributor (as owner of the information in the file)

(iii) an agent may submit a file using:

1. its own EIEP directory, in which case the 'sender' in the file name must be its own valid participant identifier or non-participant identifier that is known to the Registry, otherwise the registry will reject the file

2. the distributor's EIEP directory, in which case the 'sender' in the file name must be the distributor's network participant identifier, otherwise the registry will reject the file

(c) **Split trader and MEP requirements**: reduce complexity and add clarity by splitting trader and MEP arrangements in the business requirements where different settings and defaults apply

(d) **Additional option for distributors to load planned service interruption information (all three options shown below for context)**:

(i) EIEP transfer hub:

1. EIEP5A format (<u>not</u> using the standard Registry HDR line); or

2. Registry file format (using the standard Registry HDR line) – additional; or

(ii) Registry SFTP:

1. Registry file format (using the standard Registry HDR line)

(e) **Acknowledgements and notifications will be returned to the file's point of origin (add clarity)**:

(i) if the file's point of origin is the EIEP transfer hub then results of file validation must be returned to the distributor's EIEP transfer hub input directory (and agent's EIEP transfer hub input directory if applicable)

(ii) if the file's point of origin is the registry SFTP server, results of file validation must be returned to the distributor's fromreg folder on the registry SFTP server (and agent's fromreg folder on the registry SFTP server if applicable)

(f) **Default receipt destination for traders**: change the default receipt destination for trader EIEP5A files to the EIEP transfer hub instead of registry SFTP

(g) **Additional receipt option for traders/MEPs (all three options shown below for context)**:

(i) EIEP transfer hub (the default for traders):

1. EIEP5A file format (<u>not</u> using the standard Registry header line); or

2. Registry file format (using the standard Registry header line) – additional; and/or

(ii) Registry SFTP (the default for MEPs):

1. Registry file format (using the standard Registry header line)

(h) **Additional notifications following trader/MEP switches**: ensure clarity regarding the cut-off for additional notifications to gaining traders/MEPs (where the initial files include only ICPs the trader/MEP is responsible for) for switches with a completion date between the initial notification and start date of the planned service interruption, as follows:

For the purposes of additional notifications 'start date of the planned service interruption' means:

    (i) for an event with a single service interruption, start date or alternate date (whichever is later) of interruption 1; or

    (ii) for an event with multiple service interruptions, start date or alternate date (whichever is later) of the final interruption

(i) **Participant performs multiple roles (add clarity)**:

    (i) if a participant performs multiple roles on an ICP and uses the same participant identifier for both roles, for example where it is both a trader and MEP with a common participant identifier, the supervisor settings must apply to all roles and the participant will receive a single planned service interruption notification

    (ii) in such circumstances, if the trader has elected to receive a file with only ICPs for which it is responsible, the file will only contain ICPs where the participant is the trader only or both trader and MEP, but not ICPs where the participant is the MEP only

(j) **Web services (also see next section)**:

    (i) build a new web services interface dedicated to planned service interruption information

    (ii) add two filters 'distributor event number' and 'network participant identifier'

(k) **Validations**: provide more detail around validations to be performed by the registry, including:

    (i) amendments to SI-020 business requirements, header (HDR) and detail (DET) validation rules

    (ii) either the 'Sender" or 'Sent on behalf of participant' must be a valid network participant identifier:

        1. if 'Sent on behalf of participant' is Null (i.e. where sender is the distributor) then 'Sender' must be a valid network participant identifier

        2. if 'Sent on behalf of participant' has a participant identifier (i.e. where sender is an agent) it must be a valid network participant identifier

    (iii) as a minimum, the first set of interruption information must be provided

(l) **Registry to MEP notifications**: insert where applicable that if an MEP elects to receive planned service interruption information (which will only include ICPs which it is the responsible for), it will also receive additional notifications as the gaining MEP for switches that complete between the initial notification and start date of the planned service interruption

(m) **Additional notifications for MEP switches**: insert functional specification amendments to provide for additional notifications to the gaining MEP for switches that complete between the initial notification and start date of the planned service interruption

(n) **Additional notifications following trader/MEP switches (where initial files include only ICPs the trader/MEP is responsible for)**: insert amendments to ensure clarity around the cut-off date for additional notifications, as follows:

(i) "…..start date of the planned service interruption *(i.e. start date or alternate date (whichever is later) of interruption 1 if the event includes a single service interruption, or of the final interruption if the event includes multiple service interruptions)*".

6 Authority decisions on web services for planned service interruption information

Consultation proposal

6.1 The consultation proposed web services for planned service interruption information including two options for consideration:

(a) new dedicated web services for planned service interruption information; or

(b) new version of icp_details with for planned service interruption information appended.

6.2 Submitters were asked to provide feedback in Q12.

Submissions and Authority's consideration

6.3 There were 18 responses to Q12, with 6 submitters stating no comment or no preference.

6.4 Of the 12 submitters who provided comments:

(a) two distributor submitters did not see a need for web services

(b) one distributor submitter preferred the lowest cost option

(c) another distributor had no position as it does not use web services

(d) one trader submitter did not have an opinion and would need more time to consider the proposed design if a new dedicated web services is proposed

(e) six submitters (5 traders, 1 distributor) preferred a new dedicated web services for planned service interruption information, comments included:

(i) a new dedicated web services ensures the existing icp_details web services remains unaffected

(ii) appending outage information to icp_details could unnecessarily complicate the file and compromise its primary purpose

(f) one trader submitter preferred using the current web services icp-details with planned outage information appended.

6.5 Authority's response:

(a)   we note traders are likely to be the primary users of web services for planned service interruption information

(b)   as 5 of 6 trader submitters preferred a new dedicated web services for planned service interruption information, we will implement this option.

Summary of Authority's decisions on web services for planned service interruption information

6.6   The Authority has decided to proceed with a new dedicated web services for planned service interruption information.

7   Authority decisions on lead time

Consultation proposal

7.1   The consultation proposed a lead time of 6 to 12 months before implementation to give participants time to make any changes they choose to use their preferred delivery or receipt option.

7.2   The actual transition period will be decided once submissions have been reviewed.

7.3   Submitters were asked for feedback in Q14.

Submissions and Authority's consideration

7.4   We received 18 responses to Q14, with one providing no comment.

7.5   Of the 17 submitters who provided comments:

(a)   one distributor submitter would only require time to make a configuration change

(b)   one trader submitter would require 3 months for Options 1-3, but 12 months for Option 4

(c)   one trader submitter would require 6 months' lead time

(d)   eight submitters (5 distributors, 3 traders) agreed with a 6 to 12 months' lead time

(e)   five submitters (2 distributors, 3 traders) preferred 12 months' lead time, with one trader noting that 12 months is more realistic because very few distributors are currently using EIEP5A

(f)   one distributor submitter requires a lead time of longer than 12 months because it is implementing an advanced distribution management system which will incorporate generation of EIEP5A files (additional time required due to the budget process and system changes).

7.6   Authority's response:

(a)   most distributors already provide EIEP5A files to traders, either via email or the EIEP transfer hub

(b)   we note that all distributors and traders currently use the EIEP transfer hub to exchange other EIEP files, and will be able to continue to do so with the proposed new delivery mechanism:

(i)   distributors will be able to submit EIEP5A files to the registry via the EIEP transfer hub (the only change being the recipient code RGST); and

(ii)   traders will be able to receive EIEP5A files via the EIEP transfer hub

(c)   participants have known since October 2018 that EIEP5A is to become a regulated EIEP pending this second consultation and a decision on the delivery mechanism and timeline for implementation

(d)   apart from one distributor seeking a longer lead time than 12 months to fit with implementation of its advanced distribution management system, other submitters agree with a lead time of no more than 12 months

(e)   we will set an implementation date of no less than 6 months from the date our decision is issued which should allow time for the registry, distributors, traders and MEPs make system changes and test systems and processes before go live.

Summary of Authority's decisions on lead time

7.7   The Authority has decided to set an implementation date of **1 April 2024** and will liaise with participants to facilitate testing and ensure a smooth transition to the new mandated delivery mechanism.

8   Other matters

Assessing costs and benefits

8.1   The Authority acknowledges that for Q15 and Q17 the questions did not seek separate responses regarding the costs and benefits of mandating a single EIEP1 reporting methodology and the EIEP5A delivery mechanism.

8.2   In Q15 we asked submitters if submitters agreed with the costs and benefits (and if not, why).

8.3   In Q17 we asked if there are any other costs or benefits that we have not identified.

Submissions and Authority's consideration

8.4   There were 17 responses to Q15, with all submitters agreeing or stating no comment.

8.5   There were 17 responses to Q17, with 5 submitters stating no comment or not applicable

(a)   of the 17 responses, only 3 submitters provided comments attributable to the proposal for mandating the delivery mechanism for planned service interruptions

(b)   one trader submitter said we should ensure that any option implemented can be extended to unplanned outages in the future, noting also that there are benefits in allowing other participants to supply information into the registry (e.g. on identification of a device losing power or a related resolution of supply post a natural event or outages).

(c)   another trader submitter referred to its first preference for Option 4 on the basis of its understanding that only Option 4 included centrally performed validations, and that it would incur additional costs to build additional validations for any of the other three options into its internal processes and systems

(d)   one distributor did not identify any other benefits but suggested the true magnitude of costs and time involved to implement EIEP5A has probably been underestimated.

8.6   Authority's response:

(a)   processes for unplanned service interruptions including EIEP5B (unplanned service interruptions) are out of scope, however we note that the functionality that we will implement can be easily extended to include unplanned outages

(b)   the 2017 operational review of EIEPs sought feedback on amendments to EIEP5B (unplanned service interruptions) and the idea of a static data table in the registry for unplanned service interruption information. However, as there was very little support for using EIEP5B and submitters rejected the idea of a static data table on the basis of a preference for existing or alternative processes, we decided not to pursue this further at this time

(c)   none of the responses to Q15 and Q17 affect the Authority's decision to implement a mandated delivery mechanism consistent with Option 3.

Regulatory statement

8.7   The Authority acknowledges that for Q18-20 we did not seek separate responses regarding mandating a single EIEP1 reporting methodology and mandating an EIEP5A delivery mechanism.

8.8   Q18 asked if submitters agree with the objectives of the proposed amendment (and if not, why).

8.9   Summary of submissions on Q18:

(a)   There were 17 responses to Q18, with 15 submitters agreeing with the objectives while 2 submitters stating no comment.

8.10   Q19 asked if submitters agree the benefits of the proposed amendment outweigh the costs (and if not, why).

8.11   Summary of submissions on Q19:

(a)   There were 17 responses to Q19, with 14 submitters agreeing the benefits will, or will eventually, outweigh the costs

(b)   one distributor[16] submitter sees it as an addition to its existing processes and procedures with questionable benefits and additional costs

(c)   one trader submitter agrees but only so long as the intention is to extend the functionality to EIEP5B unplanned outages in the near future.

(d)   one distributor submitter agrees the benefits will outweigh the costs for Options 1 to 3 due to EIEP5A being mandated, but considers it is unlikely the costs of Option 4 would outweigh the benefits which are largely achieved with Option 3.

8.12   Authority's response to Q19 comments:

(a)   for networks where traders have a delivered electricity contract with customers and the distributor is responsible for notifying affected customers of planned service interruptions, we consider distributors should still provide planned service interruption information to traders so they can respond appropriately to related customer calls without having to redirect the customer to the distributor.

---

[16] This distributor notifies planned service interruptions direct to affected customers, takes fault calls direct from customers, and does not advise traders of planned service interruptions.

(b)　　we have noted above why we will not be extending the functionality to EIEP5B unplanned outages.

8.13　Q20 asked if submitters agree the proposed amendment is preferable to other options, and if not what the submitters preferred option is in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010.

8.14　Summary of submissions on Q20:

(a)　　There were 17 responses to Q20, with 15 submitters in agreement with the preferred proposed amendment while 2 submitters stated no comment

(b)　　one distributor submitter agreed on the basis Option 3 gives flexibility to participants which should help reduce implementation costs.

8.15　Q21 asked that if submitters preferred Option 4 over the other options, did the submitter have any comments on the proposed Code drafting in Appendix D.

8.16　Summary of submissions on Q21:

(a)　　There were 17 responses to Q21, with 16 submitters stating no comment, not applicable, did not support Option 4, or showing support for the preferred Option 3

(b)　　one trader submitter prefers a hybrid of Options 3 and 4 to reduce impacts and implementation costs on all participants.

8.17　The Authority notes it has responded to the hybrid suggestion in the response to Q8 comments.

8.18　Q22 asked if submitters agree the Authority's proposed amendments comply with section 32(1) of the Act.

8.19　Summary of submissions on Q22:

(a)　　There were 16 responses to Q22, with 15 submitters either in agreement or stating no comment.

(b)　　one distributor submitter disagreed with respect to Option 4. It noted that given that most distributors have EIEP5A processes, changing this into a registry maintenance file effort does not seem to comply with 32(1)(c) of the Act.

8.20　Authority's response to Q22 comments: as the submission regarding compliance with 32(1)(c) of the Act lacks detail, we cannot respond meaningfully. However, participants will have the option of whether to use the EIEP transfer hub or the registry SFTP.

Code amendment to regulate Option 4

8.21　Q23 asked if submitters have any comments on the drafting of the proposed Code amendment for Option 4.

8.22　Summary of submissions on Q23:

(a)　　There were 16 responses to Q23, with 1 submitter noting Q23 was a repeat of Q13

(b)　　12 submitters stated they did not have any comments or noted not applicable

(c)　　one trader submitter did not agree that Option 4 should be implemented

(d)　　another trader submitter was strongly of the view that if the Authority wishes to progress Option 4, a more researched consultation would be required to fully lay out the cost-benefit analysis of changing from EIEP exchange to a registry maintenance mechanism. It also commented that based on the information

presented in the consultation paper, Option 4 seems to be costlier to implement and removes flexibility from traders on how they choose to handle and process the information.

Code amendment to regulate EIEP5A

8.23   EIEP5A v11.2 reflects the Authority's decision to implement Option 3 and there is no need to consider further the proposed Code amendment for Option 4.

Appendix A   EIEP5A v11.2 Planned Service Interruptions

A.1   Attached is the final version of EIEP5A v11.2.

Appendix B   CR-1208 EIEP5A Registry Format

B.1   Attached is the final CR-1208 EIEP5A Registry Format (Solution Proposal and Appendix A Functional Specification Changes).