

22 September 2017

Submissions
Electricity Authority
PO Box 10041
Wellington 6143.

By email to submissions@ea.govt.nz

Re: Consultation Paper – EIEPs, 2017 operational review

Dear Electricity Authority

The ENA is appreciative of the opportunity to submit on the Electricity Authority consultation paper that proposes further amendments to the electricity information exchange protocols (EIEPs).

It is our understanding that this review was established to attend to a number of small issues that were identified by both industry participants and the SDFG, rather than in response to a defined problem. ENA members view the review as something of a ‘timely tidy up’ of a backlog of issues and a general alignment of the terminology in the EIEPs with that recommended in the ENA pricing guidelines for electricity distributors.

Members also regard the review of register content codes in a similar manner, – that is a tidy up of various aspects of the codes, and our feedback is provided in a separate submission.

Our EIEP submission takes the form of a letter because the consultation paper includes 53 specific questions on aspects of the proposed changes to the EIEPs that we are simply unable to address. Individual ENA members may provide specific feedback to the Authority on some or all of those questions but the ENA cannot.

While members agree that a tidy up is a good idea, they question the timing and the complexity of the changes that the Authority proposes. As regards timing, you are aware that the distribution sector is engaged in a programme of pricing reform. A core piece of work in this programme is to look at the technical issues with data, systems, information security and privacy and with billing issues, in the context of these issues possibly hindering the reform process.

The joint work group that has been set up to address these technical issues, will also look for any changes that will be needed to both the EIEPs and the register content codes. Given the potential

scope of the changes that will take place to definitions of distribution services, to price types and therefore to data types and formats, members consider the changes proposed in this 2017 EIEP review to be premature. It will likely be better to leave any material changes until the technical work group has made progress with its detailed review.

As regards complexity, we observe that the consultation paper includes quite detailed changes to definitions, pricing and price components, as well as to data and information protocols, all down to quite a level of detail. For the reasons we describe in the previous paragraph, we consider the changes to be too prescriptive at this time. Members consider that, other than more general tidy up changes, complex revisions should be avoided while it is possible they could end up as redundant and result in wasted effort when the technical work group has completed its task.

ENA members do however support the Authority effort to make the EIEPs more consistent with the developments in industry standardisation and therefore better fit for purpose in 2017. Members also encourage the effort to get the EIEPs ready for a more dynamic electricity sector but we caution the Authority not to make detailed changes to the EIEPs until the current pricing reform work is progressed further.

Yours sincerely

A handwritten signature in black ink, appearing to read 'David de Boer', written in a cursive style.

David de Boer

Principal Advisor