#### Standing Data Formats Group

Venue ::: Electricity Authority, Level 7, ASB Bank Tower, 2 Hunter Street, Wellington, Meeting Room 1

Time and date ::: 10:00 - 4:30 ::: Friday 11 April 2014

#### **Minutes**

#### **Present**

Nick Bennetts (Chair)

#### **Members**

Chris Cooper TrustPower
Jason Christini-Crawford Genesis Energy

Lisa Gilmore Advanced Metering Services
Stefan Kirkwood Powershop New Zealand Limited

Danny McManamon Contact Energy

Alex Nisbet Orion New Zealand Limited

Joan Purdie Vector

Helen Youngman Meridian Energy

#### **Apologies**

Michael Peterson Arc Innovations
Peter Smith Northpower

#### In attendance

Grant Benvenuti Manager Market Operations, Electricity Authority

Chrissy Burrows Consultant, Momentous Consulting Ltd

Nicole Gagnon Assistant Adviser Market Operations, Electricity Authority

For the agenda item 'Draft format for the provision of customer information in the event of a retailer default

situation':

Andrew Walker GIC representative

Marianna Pekar GIC representative

For the agenda item 'Issues with EIEP 12':

Ron Beatty Principal Adviser Market Services, Electricity Authority

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The meeting opened at 10.00am.

#### 1 Welcome

#### a) Apologies

The Chair noted apologies had been received from Peter Smith and Michael Peterson.

#### b) Members update

The Chair welcomed and introduced two new members, Chris Cooper and Lisa Gilmore. The Chair advised that Michael Peterson, also a new member, had forwarded his apologies. Resignations from Blair Jones and Zane Khan had been received. The Assistant Adviser advised that nominations would be called for a further distributor member in the next few days. Nominations would close on 3 May 2014.

#### c) Minutes

The Chair noted that the minutes from the previous meeting held on 8 August 2013 had been approved by members via email and were published on the Authority's website.

#### d) Actions

Of the four action points outstanding, the following was agreed:

Action point 100 - Completed.

Action point 109 –Leading zero's not accepted in application of post codes on the registry: The Assistant Adviser advised that the Authority is about to consult on three changes to the registry after Easter. Consultation was required as changes could impact participants systems.

Action point 110 –Education is required on the new billing methodologies and other aspects of the new EIEPs. Advice sought from the Authority on the best approach: The Assistant Adviser noted that the Authority is considering holding a series of forums for participants which would occur later in 2014. The intention is to hold registry training forums for all participants and then have individual forums for distributors, retailers and metering equipment owners. A member suggested that there was a need for reconciliation and switching forum to be held alongside the distributor's forum.

Action point 111 – Completed.

#### e) Work plan

One member queried if the first work plan item included requests for EIEPs to be made mandatory under the Electricity Industry Participation Code 2010 (Code). It was agreed that the request for EIEPs to be made mandatory would be included in the change request form.

The SDFG agreed that a new work plan item be created to allow for other data exchange and communication requests from the Authority.

The Assistant Adviser noted that not all documentation, especially communications through email, was resulting in publication on the website for the SDFG. The Assistant Adviser proposed that a summary of decisions made by the SDFG from email communications be published. Any summary of decisions papers would include the same level of review by the Chair and the members as required by the current meeting papers.

One member inquired as to what had happened in relation to the work presented by Mathew Keir at the

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meeting of 8 August 2013. Mathew's presentation was to open discussion on suggested amendments to EIEP1 or to incorporate a new EIEP for the purposes of capturing pricing information required by the Authority. Assistant Adviser to follow up.

No further points were noted for the work plan.

Action	Ву	Date for action
Follow up with Mathew Keir to inquire if and when the	Assistant Adviser	May 2014
requirements for a new or revised EIEP for the purposes of		
capturing pricing information are required.		

#### 2 Update on publication of regulated and non-regulated EIEPs

The Assistant Adviser opened this topic by explaining that because consultation for the mandating of EIEPs 1, 2, and 3 occurred at the same time as consultation for the proposed Code, the consultation for mandating EIEPs 1, 2 and 3 was deemed to have not occurred. The Assistant Adviser also explained that there were some minor Code amendments that were underway that would resolve this situation and would come into force mid May 2014.

There was discussion around the proposed effective date of mandated EIEPs 1, 2, and 3. One member requested that the date be pushed out to at least April 2015 to ensure system readiness. Some of the other members disagreed and noted that any change to the date at this stage would impact their external source requirements. It was also noted that, as the due date of 1 November 2014 had been in existence for some time, there would need to be a good reason why the date should be changed. The SDFG agreed that, as long as the minor Code amendments came into force in mid-May, that the effective date for EIEPs 1, 2, and 3 to be made mandatory remain at 1 November 2014.

The issue of the ability to reach agreement between participants on the use of the mandated EIEPs as part of a use of system agreement was also discussed. Agreement is not always easily reached; one member asked what is to be done if either party does not agree. Members noted that the default EIEP should apply, the dispute process could be applied, or a Code breach allegation made.

Action	Ву	Date for action
Assistant Adviser to ensure EIEPs 1, 2, and 3 are finalised and published once the minor Code amendments come into force in May 2014.	Assistant Adviser	May 2014

#### 3 Application for amendments to EIEPs

A discussion paper including individual requests from industry participants for amendments was provided to SDFG members prior to the meeting. This paper requested that the SDFG determine if:

- the chargeable days field in EIEP 2 should be increased from integer 4 to integer 7
- the network tariff rate field in EIEP 2 should be increased to numeric 6.6
- the network charge field in EIEP 2 should be increased from numeric 7.2 to numeric 9.2
- there would be benefit in making EIEP5A mandatory.

A member suggested that application forms be in the form of a word document as the existing application form as a PDF that required a signature which was not practical. The Consultant noted that it had previously been a work plan item to review the application process and associated forms. It was agreed that the application process and associated forms would be reviewed.

The SDFG discussed whether EIEP 5A should be made mandatory. The Assistant Adviser noted that before an EIEP can be made mandatory under the Code, the Authority would need to consult with interested parties. The Chair requested the SDFG vote on this matter. The SDFG unanimously agreed to propose that EIEP 5A be made mandatory and released for consultation. The majority of members agreed that a nine month lead time would be required in the event that EIEP5A was to be made mandatory.

#### The SDFG recommended that:

- the chargeable days field in EIEP2 be increased from integer 4 to integer 7
- the network tariff rate field in EIEP2 is not increased as it is already a numeric 6.6
- the network charge field in EIEP 2 be increased from numeric 7.2 to numeric 9.2
- the Authority consults with interested parties to propose that EIEP5A be made mandatory.

#### **Actions**

- Increase the chargeable days field in EIEP 2 from integer 4 to integer 7
- Increase the network charge field in EIEP 2 from numeric 7.2 to numeric 9.2
- Consult with interested parties to propose that EIEP5A be made mandatory
- Review the EIEP application process and associated forms

Note: timeframes for implementation of any amendments to EIEPs to be reviewed.

# Assistant Date for action June 2014 to

Adviser

June 2014 to increase the EIEP fields

#### 4 Request to allow use of IN24 as a register content code

The Authority received a request from a participant to approve IN24 as a register content code. The main reasons being that the removal of IN24 would be costly and participants have not raised any issues with the use of IN24.

The Chair requested that members think about what would be best practice for the industry.

The Manager Market Operations believed that there were two issues with IN:

- should the period of availability mean something about the primary controlled load?
- what should the period of availability be?

The discussion raised the following points:

• In the future, a distributor could provide two periods of availability for the one code but a trader

would not know which was which.

- The number 24, as it could cover varying periods depending on which and how each network applies the number, does not mean anything at present.
- The number after IN should mean something about the primary controlled load.

The majority of the SDFG agreed that the number after IN should mean something about the primary controlled load. The number should represent the period of availability for the primary load. On this basis the SDFG recommend that the application for IN24 to be included as a valid register content code is declined.

This then raised some further questions:

- If the hours are not specified? A distributor is able to change the number of hours on a controlled supply in its network at any time.
- What control number would mean where there are no control hours?
- If there is no minimum control hours, does one stick with 24?

A memo that was released by the Principal Adviser (attached as Appendix A) during the Part 10 review advises participants where to locate a list of valid content codes and the definition of period of availability. It was suggested that this memo be used to assist in resolving any issues with existing valid code combinations.

#### **Actions**

- Respond to the requesting participants' request for IN24 to be approved as a register content code, noting that the SDFG recommend the request be declined.
- Ensure that the Powershop and AMS members have taken into account the Part 10 memo released by the Principal Adviser when creating business rules for register content codes.

#### By Date for action

Manager Market Operations

Assistant Adviser June 2014

#### 5 Period of availability for register content codes

A discussion paper was provided to members prior to the meeting that highlighted some inconsistencies regarding the application of register content codes.

- Point 2 of the discussion paper one member disagreed with the statement that NC8 be used as a night rate; NC8 should only be used when there is a DC. A CN can be used when there is for example a night store.
- Point 8 of the discussion paper- members agreed that there is clearly confusion within the industry
  on the use of register content codes and that business rules would not only benefit metering
  equipment providers but also new entrants.
- Point 9 of the discussion paper The question of whether any proposed business rules should be in the form of a guideline or made mandatory was discussed. Suggestion from a member was to have guidelines with monitoring by the Authority. The question was raised as to what costs would be

involved with monitoring, to which the Manager Market Operations responded they would be minimal. One member raised the concern that guidelines do not change participant behaviour.

It was agreed that business rules should be drafted and proposed. Two members of the SDFG, Stefan Kirkwood and Lisa Gilmore, agreed to draft the business rules. The Assistant Adviser agreed to co-ordinate and collate responses to emails regarding drafting, as necessary. It was agreed that the group would be in a better position to make a decision whether to monitor or regulate once the draft business rules had been created.

The discussion then moved on to the table of codes supplied with the discussion document. It was discussed that, before the business rules can be drafted, consideration needs to be given to whether the register content codes will be generic or specific to networks. This could not be done until the Principal Adviser had completed work on the current register content codes awaiting approval. The Manager Market Operations noted that one issue is where participants are confusing the registry content codes with customer pricing plans and not the configuration of the meter.

One member raised the issue that register content codes applied for previously by Meridian and Contact do not appear to have been officially approved or put on the registry. These had been discussed with the group and agreed. The Assistant Adviser to follow up with these codes as noted in the minutes of July 2012.

Further discussion ensued raising the following:

- The registry is not getting changes through in a timely manner. The Manager Market Operations noted this and requested that participants please notify the Authority of these cases.
- The SDFG queried how the process for approval of register content codes should work. Whether the group has the authority to approve the register content codes or make a recommendation to the Authority. It was also discussed whether new register content codes require consultation with the wider industry or whether they can be implemented with notice to the industry. The Manager Market Operations asked how traders handle register content codes that just appear on the registry. Members advised that they need notice before register content codes are implemented.
- The SDFG requested clarity on the approval process for decisions that the SDFG make. The Assistant Adviser noted that, if group decided whether or not to go forward with any decisions via email that these should be published on the website. A member added that any decision should have also been recorded in meeting minutes.

#### Actions

- Draft business rules regarding the application of register content codes, once the Principal Adviser has released the results of the current amendments to the register content codes.
- Co-ordinate responses to drafting of business rules for register content codes from all members, as necessary.
- Follow up on the approved register content codes submitted by Contact Energy and Meridian Energy.
- Determine the approval process of the SDFG for register content codes.

# By Date for action Powershop and TBC

Assistant Adviser TBC

Assistant Adviser

AMS members

Assistant Adviser

June 2014

June 2014

#### 6 Non half hour meter frequency guidelines and format for submission

As there was time prior to the lunch break the Chair moved this agenda item forward.

The SDFG had been provided with a draft guideline prior to the meeting. On the non-half hour meter read frequency guidelines discusses what could be constituted as best endeavours when attempting to obtain a validated meter reading, to promote a greater level of consistency for submitted data to the Authority, and allow for easier identification of breaches.

A member opened discussion by asking why the Authority requires the meter frequency report monthly. The Manager Market Operations commented he receives the report and it goes to the Chief Executive. The report does show every now and then that the reconciliation participants are having issues.

The following points were discussed:

- Table 2 of the guidelines: Would be a big cost to implement. The Manager Market Operations was going to use table 2 to validate exceptional circumstances. However, this may also be achieved on an as needed basis and agreed that table 2 should be removed from the guideline.
- The Manager Market Operations queried how a trader knows how accurate their records are. A response was that accuracy is determined through the audit process. It was later added to this point that the audit process alerts to systemic issues, it is at this point that the Authority would need to ask if reasonable endeavours have been met and to provide examples.
- One member requested a column on the left side of table 1 for retailer month and the month of the report.
- The Manager Market Operations noted that all ICPs held continuously for the 12 months are to be reported.
- What would be the preferred transfer mechanism email or hub (SFTP)? If the hub is to be used a file naming convention would be needed that aligns with the EIEP hub transfer system (CSV) file.

Actions

Update non half hour meter read frequency guidelines:

remove table 2

add columns in table 1 for retailer and month of the report

review whether the format in table 1 might be transferred via the EIEP hub. If so, create the correct file naming convention and add it to the guideline.

Date for action

Assistant
Adviser

June 2014

The group broke for lunch at 12.30 pm

The GIC representatives joined the meeting at 1.00 pm

#### 7 Draft format for the provision of customer information in the event of a retailer default situation

The Chair introduced the two GIC representatives who had been invited to partake in the discussions on the paper supplied for this meeting "Provision of customer information in the event of a retailer default situation.

In the event of a retailer default situation, it may be difficult to obtain customer information for a recipient retailer. The Authority has drafted a format for the provision of customer information and would like the SDFG's comments on what fields are necessary for retailers to efficiently accept assigned ICPs from the Authority.

The Assistant Adviser explained the options noted in the paper. The concept is that the Authority would be able to provide customer information to the recipient retailer in the event of a retailer default situation. The draft format will form part of a wider consultation with several options for the provision of customer information. The consultation will be clear in what the information gathered would be used for.

A member noted that, as a starting point, having customer information would aid a retailer to contact customers.

The Chair clarified the process for a defaulting Retailer in relation to 5(a) of the document.

A member wanted assurance that customer information is not used for other purposes as their Terms and Conditions don't cover other options for providing information. Further discussion raised concern that another trader or team at the Authority could have access to the information. The Assistant Adviser noted that the consultation would be clear that the information could only be used for certain purposes.

It was queried what kind of information recipient traders would want to be able to process customers in a retailer default situation.

Discussion took place on the following points

- Registry doesn't provide read information. This raised further issues like knowing if there were multiple meters and that data loaded could be as much as six weeks out of date (re extra fields at the end of the suggested file). The CS file does not contain read information.
- Concern was noted of big overhead for including information in the file that is not necessarily valid.
- The question was raised as to who is responsible for the reconciliation for the missing period between defaulting retailer and new.
- The Assistant Adviser noted that the draft format and consultation is to mitigate risk and explore the
  options. A member added that it is how much information is needed and what frequency. Do not
  want it made too complex.
- Date of transfer would be date the ICP is transferred and would not be back dated.
- The group discussed gaps between days in the month files are transferred. No resolution was arrived at.
- Inactive ICPs will not necessarily have a customer attached to it, it could be vacant. In these cases the information for the ICP will be blank. For the purpose of a default scenario 'vacants' would need to be included, everything except decommissioned ICPs.
- The GIC representative and a member commented from experience that inactive ICPs in a default situation have been a problem. In one case the liquidator retained staff so billing could occur, but this will not necessarily be the case in all default scenarios.

- Question was asked, is EIEP4 currently adequate? The answer from the SDFG was that EIEP 4 is a one
  direction format; it is more whether the additional fields would be beneficial. Rather than creating a
  new EIEP, use EIEP 4 as a basis with some minor alterations, but the reads would have to be obtained
  separately.
- The Assistant Adviser queried whether EIEP4 should go out for consultation with the draft fields removed and ask in the consultation what is wanted, or provide the draft fields in the format and ask participants if they are needed?
- It was noted that retailers who offer dual fuel complicate a retailer default situation.
- It would be sufficient for the Authority to collect and store or archive the information, and retrieve it only if it is needed in a default process, rather than loading the information on the registry.

#### The SDFG agreed:

- the draft format for the provision of customer information is styled on EIEP4 as is, with no new fields inserted. Additional information to be provided in the body of the consultation paper instead.
- the consultation paper includes the difficulty with multiple meters and out of date information.

## Actions By Date for action Assistant August 2014

- Draft format for the provision of customer information be styled on EIEP 4 as is, with no new fields inserted. Additional information to be discussed in the body of the consultation paper instead.
- Include in the consultation paper for the provision of customer information in the event of a retailer default situation the difficulty with multiple meters and out of date information.

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Assistant Adviser	August 2014

The GIC representatives left the meeting at 2 pm

#### 8 EIEP1: Clarification on network charge field

A brief discussion paper was provided noting that the network charge description in EIEP1 is unclear. Discussion centred on the use of 'net of' in the network charge description field and the meaning that is associated with it.

The SDFG agreed that 'net of' means after deduction of discounts not pre-discounts.

The SDFG recommended that the Authority clarify the meaning of 'net of' and circulate to participants.

Action	Ву	Date for action
Memo to be sent to participants clarifying what 'net of' means in the network charge field description in EIEP1.	Assistant Adviser	June 2014

#### Ron Beatty joined the meeting.

#### 9 **Issues with EIEP12**

The Authority had previously communicated with the SDFG by email regarding some clarity issues with the register content and unit type in EIEP12. It was decided that the SDFG meet to discuss these, and other, issues to do with EIEP 12.

There was discussion on the following:

- Some distributors are unsure of the differences between register content codes and tariff codes. A
  member noted that the question is about pricing not quantity, so the price is to be placed against the
  tariff code.
- The issue of whether the consultation from the Principal Adviser related to the format of EIEP12 or the standardisation of information in the file.
- What a meter register code was. For example PF for power factor could be unique to a distributor. A
  tariff code is an identifier assigned to a rate. It was suggested that a working example would be of
  benefit.
- What the benefit of EIEP12 is as it does not instruct how it is to be applied. It was clarified that EIEP12 was created to advise of pricing changes.
- Prices that are applied against multiple categories should be applied against each individual category in EIEP 12.
- There are conflicts between the distributor's pricing schedules and what has been populated in EIEP12.
   It was noted that the inaccurate population of EIEP 12 with the pricing schedules may be remedied with some guidance from the Authority.
- There is insufficient information in EIEP12 to implement network pricing. It was noted that EIEP12 was
  never meant to deliver full information for implementation purposes; it was designed as a notification of
  pricing updates only.
- EIEP12 was received too late to be of use to some participants. The Principal Adviser Market Services considered that there should be some mention of timeframes in part 12A of the Code. The Principal Adviser Market Services will review section 12A of the Code to see if there is a timeframe specified.
- How units are to be populated in EIEP12. There needs to be more flexibility, especially under Unit Type. A member proposed that any suitable unit type that reflects the charge, could be used rather than selection from a table. The SDFG recommended that the Authority consult with interested parties on amending the Unit Type field to allow for other terms to be used to match distributors published pricing schedules.

#### Proposed amendments to EIEP12:

- Change comment of Unit Type to read: "The type of unit in which data is supplied as per the distributor's published pricing schedule (eg kWh, kW/day, Day, kVA.km)". Delete "unit of measure type table. If no unit is advised, the unit type is kWh (for variable charges), and days (for fixed charges)".
- Change "O" in mandatory optional column to "M" for Unit Type to make it a mandatory requirement.

Actions	Ву	Date for action	
Review part 12A of the Code to see if a time frame is specified	Principal	June 2014	
for the provision of EIEP 12.	Adviser Market		

- Propose the following amendments to EIEP 12:
  - Change comment of unit type to read: "The type of unit in which data is supplied as per the distributor's published pricing schedule (eg kWh, kW/day, Day, kVA.km)". Delete "unit of measure type table. If no unit is advised, the unit type is kWh (for variable charges), and days (for fixed charges)"
  - Unit Type change "O" in mandatory/optional column to "M" to make this field a mandatory requirement

Ву	Date for action
Principal Adviser Market Services	June 2014
Assistant Adviser	ТВС

#### 10 Other business

The Principal Adviser Market Services asked if SDFG member/s could present at the distributor forum to discuss EIEPs. The Orion member offered to present if he had assistance from other SDFG members.

The SDFG meeting closed at 3.20 pm

Appendix A: Memo from the Principal Adviser on register content codes and period of availability

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### Memo

**To** Part 10 contacts

From Ron Beatty

Date 20 February 2013

**Subject** Register content codes and period of availability

For your information

#### Register content codes

Metering Equipment Providers (MEPs) are required to populate registry metering records with the register content code for each channel used in the settlement process. The list of valid register content codes is available at: <a href="http://www.ea.govt.nz/our-work/programmes/priority-projects/part-10-review/part10-implementation/registry-functional-specification/">http://www.ea.govt.nz/our-work/programmes/priority-projects/part-10-review/part10-implementation/registry-functional-specification/</a>

There are currently no register content codes in the list for half hour channels. The Authority proposes to include the following register content codes within the Part 10 registry to allow MEPs to populate channels correctly for sites that use half hour channels. Note that the channel description does not indicate if the channel is subject to load control or not.

Code	Description	Associated period of availability
7302	30 minute recorded channel kVAh	24
7304	30 minute recorded channel kWh	24
7306	30 minute recorded channel kVArh	24

Should any participant require an additional register content code, application should be made to the Authority as soon as possible.

#### Period of availability

There has been considerable debate on the definition of period of availability. This is defined in the current registry functional specification as "Minimum service hours of supply per day" and in the new Part 10 registry functional specifications as being "Minimum service hours per day". It is mandatory in the channels for metering components of meter and data storage devices.

To assist understanding for the Part 10 registry, the following examples are provided and align with the Part 10 registry functional specification:

Register Content Code and Period of availability memo 759606-3

#### **Example 1**

A metering installation comprises an uncontrolled channel and a controlled channel with downstream load control that may be exercised by the distributor for a maximum control period of 5 hours per day (meter 2).

The register content code and period of availability that is associated with these channels is then as follows.

Uncontrolled channel = UN24 Controlled channel = CN19

#### Example 2

A metering installation comprises a uncontrolled channel with downstream load control that may be exercised by the distributor for a maximum control period of 5 hours per day measured through the same channel. The channel is then defined as "inclusive" with both anytime and controlled measured through the same measuring element.

The register content code and period of availability that is associated with this channel is then as follows.

Inclusive channel = IN19

Ron Beatty

**Manager Market Operations** 

DDI: (04) 462 0609 Mobile: 021 618 048

Email: ron.beatty@ea.govt.nz