9 August 2016

Submissions
Electricity Authority
By email: submissions@ea.govt.nz

Retail data project: standardised tariff plan data file format – Consultation paper

Meridian appreciates the opportunity to provide feedback on the above paper. All references to Meridian in this submission should be taken to also include Powershop unless stated otherwise.

Appendix A provides our responses to specific consultation questions. In summary we consider:

- Giving specific feedback is difficult at this time, but our view at this stage is that the draft EIEP 14 format requires several simplifications. We would also like to understand the logic to requiring earlier (within 2 BDs) notification of additional attribute code information.
- Uncertainty in relation to how the draft format will operate in a practical sense, and in the way that tariffs might evolve, mean that a voluntary approach is important.
- Detailed cost / benefit analysis of a JSON format and central repository for tariff information is needed.

Please contact me if you have any questions relating to this submission.

Yours sincerely,

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Appendix A   Responses to consultation questions

	Question	Response
1	Do you have any comments on the draft EIEP 14?	The format as currently drafted requires a highly detailed level of information. The information supplied clearly needs to enable reasonable comparisons to be made within reasonable timeframes, but we are concerned the format will be complex to administer. Having EIEP 14 voluntary is important because it is unclear how the format will operate until it is actually being adopted in practice and also given ongoing tariff innovation.[1] Meridian requests the following adjustments are made to simplify the format: • Re-classifying fixed term (date, period, and price) information as a category of plan (not tariff). • Consistent classification of information on discounts and credits (currently classified as a customer/plan attribute) and claw backs (currently classified as plan-related). Within, say, 18 months, we consider the Authority should revisit the option of introducing a central repository for tariff information.[2] In the longer term this may be more cost effective and efficient than the current retailer-administered arrangements.
2	Do you have any specific comments on any of the file format fields or business rules?	Giving specific feedback on detailed elements of the draft format is difficult at this pre-implementation stage. This was also found to be an issue recently through the process of implementing standardised consumption data formats. In terms of some initial feedback, proposed business requirement 9(c) of the 'strawman' protocol 14 format specifies that retailers must advise on the meaning of any additional attribute Code "within 2 business days of a request from a third party service provider".[3] We query why this information cannot be provided at the same time as supplying the requested tariff data information (i.e. within 5 BDs).
3	Do you consider there are alternatives to an EIEP 14 that could be used/developed as a standard format? Please give reasons for any alternatives.	An EIEP 14 format seems to us the most appropriate choice at this time.

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[1] With the Authority's distribution pricing review well underway, this can be expected to continue.
[2] The Authority's 23 June 2015 'Access to Tariff and Connection Data' consultation paper (available: https://www.ea.govt.nz/dmsdocument/19494) includes some initial analysis of a central tariff data repository, but does not assess potential costs or alternative types of approaches.
[3] Refer page 2, Appendix B of the Authority's consultation paper.

	Question	Response
4	Do you consider that within the format that the hierarchy should be "customer" as a subset of "retailer"? Currently the format shows "retailer" as a subset of "customer". Please give reasons.	At this stage we have no firm preference either way.
5	What are the pros and cons of specifying a JSON format? (a) for this EIEP (b) for other EIEPs both current and future?	Meridian considers the paper's claims of "strong support" from SDFG members for the adoption of a JSON format are overstated. [4] As a whole, we consider the group had mixed views with some strongly in favour and others more ambivalent. Introducing a new JSON format – whether for EIEP 14 or other EIEPs – needs to be considered as part of a full cost / benefit analysis. An important consideration for this analysis to address will be whether a JSON format is to be provided as a replacement or in addition to the more common CSV format (i.e. to be at the choice of the requestor, not the retailer). Meridian's systems[5] do not currently support a JSON format and our initial view is that a JSON format is likely to involve significant costs and complexity, particularly if retailers will be required to operate using dual (JSON and CSV) formats.

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[4] Refer paragraph 3.7.4 of the Authority's paper.
[5] While Meridian's own systems do not support a JSON format, the JSON format is able to be supported by systems operated by Powershop.