Better together.

9 August 2016

Submissions
Electricity Authority
Level 7, ASB Bank Tower
2 Hunter Street
P O Box 10041
WELLINGTON

By email: submissions@ea.govt.nz

TRUSTPOWER SUBMISSION: A FILE FORMAT FOR EXCHANGING GENERALLY AVAILABLE RETAIL TARIFF PLAN DATA

1   Introduction and overview

1.1.1   Trustpower Limited (Trustpower) welcomes the opportunity to provide a submission to the Electricity Authority (EA) on its '*A File Format for Exchanging Generally Available Retail Tariff Plan Data*' consultation paper (the Consultation Paper).

1.1.2   We understand that the main points put forward in the Consultation Paper are as follows:

a)   The Electricity Industry Participation Code 2010 was amended 1 February 2016 to require retailers to provide information around their generally available retail tariff plans, to any person that requests them;

b)   The amendment did not specify a format of method for retailers to provide this information; and

c)   The consultation paper is introducing a draft file format for use by retailers in order to provide this information.

1.1.3   Our submission focuses on two issues:

d)   The file format; and

e)   The definition of Generally Available Retail Tariff Plans.

2   File Format

2.1.1   Trustpower is in support of the file format as presented – it captures the complexity of offers currently in the market, as well as leaving room for future innovation.

2.1.2   Trustpower believes that the hierarchy should be brand before customer, as brands generally operate independently of each other, rather than brands being mixed across a customer group.

2.1.3   Trustpower supports the JSON format, as better suits the hierarchical nature of the information in question.

3   Generally Available Retail Tariff Plan definition

3.1.1   One matter that arose during the working party's work on the file format is that there is still some confusion around what constitutes a generally available retail tariff plan.

3.1.2   Thus Trustpower believes it would be beneficial for more guidance to be provided in this respect, to ensure all retailers are consistent in approach.

3.1.3   Our answers to the specific questions posed in the Consultation Paper are attached in Appendix A.

3.1.4   For any questions relating to the material in this submission, please contact me on 07 572 9888.

Regards,

GARETH BANKS
MANAGER PRICING AND COMMERCIAL ANALYSIS

Trustpower response EIEP14 v1.0.docx

Question	Response
1. Do you have any comments on the draft EIEP 14?	1.1 No.
2. Do you have any specific comments on any of the file format fields or business rules?	2.1 Clarification of what tariffs need to be submitted would be useful.
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.	3.1 No, we believe that to show all available tariffs, there is a lot of complexity required so this format caters for the complexity. Other formats will likely lead to information such as terms, exit fees not being easily conveyed.
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.	4.1 Trustpower considers that customer should be a subset of retailer, so that the file allows for ready splits between brands, which should be before customer.
5. What are the pros and cons of specifying a JSON format (a) for this EIEP? (b) for other EIEPs both current and future?	5.1 (a) The JSON format allows for a better representation of the hierarchy in play than CSV formats do. 5.2 (b) For future EIEPs, if they are hierarchical in nature then we believe the JSON format would also be suitable.