8 August 2016

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Electricity Authority
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(by email to submissions@ea.govt.nz)

Submission on Retail Data Project: a file format for exchanging generally available retail tariff plan data

Please find attached Cortexo's response to the above Consultation Paper dated 28 JUNE 2016. Cortexo appreciates the opportunity to participate in the working group and provide input into this process.

We fully support the Authority with regard to this project and believe that the outcomes will be increased competition and innovation in the electricity market that will directly benefit consumers.

Our response to the consultation questions are attached.

Yours faithfully,

Terry Paddy
Managing Director

Question	Comment
Q1: Do you have any comments on the draft EIEP 14?	Cortexo fully supports this format for the exchange of tariff data and consider it fit for purpose.
	Our view is that a standard format is important to ensure the growth of innovative solutions and the ability to automate solutions.
Q2: Do you have any specific comments on any of the file format fields or business *rules?*	With reference to the JSON format:
	Currently entire option is shown as being in an array. We do not think this necessary or desirable. There should be one file per JSON document
	Field "Uniquifier" should be "Identifier" for clarity
	Although not critical, it is worth noting that with JSON format fields are not name length limited and could be descriptive. For example LFC, DPC, FixVar, DTST could be clearer. FixVar could be FixedVariable for example.
	For examples and actual file names should end in ".json" rather than ".txt". This is clearer and allows stand tools to recognise files and pick up errors etc.
	Presumably these files could be zipped for transfer
	Attribute objects should have a description with each to allow them to be displayed to the consumer by various services.
	Regarding Tariff:
	On fixed rates, why does it have some columns that only really relate to variable rates. For example RegisterContentCode.
	Would be clearer if example showed how seasonal rates are implemented.

Q3: 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.	Cortexo is not aware of any alternatives that would be suitable for adaption to this use.
Q4: 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.	We note that the CSV version and JSON version are presented differently at this stage. We have a strong preference for customers being a subset of retailers as it makes sense to be able to process all customers across each retailer at one time.
Q5: What are the pros and cons of specifying a JSON format (a) for this EIEP? (b) for other EIEPs both current and future?	For this EIEP14 we believe the JSON version is significantly easier to understand than the CSV version. This is due to the hierarchical structure of the data which is difficult to understand in the CSV format as column names keep changing for each record type In our view JSON is an excellent format to use for this sort of data as there is little replication and hierarchy is clear. It is also very suitable for API use. As the demand for more responsive systems increases then incremental updates can be catered for with JSON. We believe that future standards are likely to be suited to JSON as well, given that there is likely to be a need for hierarchy and responsive API use. As earlier standards are updated it may be appropriate to use JSON, but not as a matter of course.