9 August 2016

Submissions
Electricity Authority
Level 7, ASB Bank Tower
2 Hunter Street
Wellington

By email: submissions@ea.govt.nz

Dear Electricity Authority,

Consultation Paper – Retail data project: a file format for exchanging generally available retail tariff plan data

Thank you for the opportunity to comment on the Electronic Information Exchange Protocol 14 (**EIEP 14**), developed by the Electricity Authority (**Authority**).

This submission sets out Contact's answers to the questions posed by Authority in Appendix A.

Contact's position can be summarised as:

1. The EIEP 14 should remain voluntary;
2. Further clarification is required as to what the means of transfer will be;
3. Further clarification is required around the details of customer, plan, and tariff attributes;
4. The hierarchy within the format should ensure that "customer" is a subset of "retailer"; and
5. Standardisation should be a key consideration in terms of developing and maintaining the protocols.

Should you wish to discuss any of the matters raised in this submission please don't hesitate to contact me on 04 462 1017.

Yours sincerely

Dave Gendall
Regulatory Affairs and Government Relations Advisor

Appendix A: Format for submissions: a file format for exchanging generally available tariff plan data

Submitter	Contact Energy

Question	Comment
Q1: Do you have any comments on the draft EIEP 14?	EIEP14 must remain voluntary as there are different formats currently being exchanged between parties which are fit for purpose and providing the required information. Given the variety of pricing plans and attributes involved this format needs to take as wide a view as possible to capture this information. Given that the file is to become part of the EIEP suite of protocols consideration should be given to trying to standardise the file wherever possible to retain consistency.

Q2: Do you have any specific comments on any of the file format fields or business rules?	Discussion document: 3.3.1
	Mentions machine to machine transfer via the internet but is non-specific as to the actual means of transfer. Clarification is required as to what the means of transfer will be.
	Attribute codes: Any new attribute codes are to be sent to the EA within 3 months of the first use of the code. What action will the EA take (for example – can the EA decline use of a new attribute code)? How will the table of attribute codes be managed - will this be published and updated on the EA website?;
	The preamble should include clarification on the difference between "trader" and "retailer" as this distinction is made within the protocol;
	Recipient: requires participant identifier – do all third party service providers have a 4 character participant code?; and
	File header: Not consistent with EIEP (Report period start/end dates and Utility type missing).
	Customer attributes:
	Unit of measure: The validation rules refer to different unit types that do not exist in the current Unit of Measure table – and are not actual units of measure (eg ANZSIC). Should this field be renamed and a new table created and populated?
	Plan attributes:
	Unit of measure (as per comment above).
	Network record type: Clarification is required on what should be populated in this field – is it "NETWORK"?
	Tariff attributes:
	Unit type – does this refer to the Unit of Measure table included in the protocol? - noting that this table differs from the table in other EIEPs as this is flagged as "not exhaustive". Should some consistency be applied here?
	Register Content Code: Validation rule allows for "Fixed" to be populated in this field- the Tariff section already has a F/V flag – is there any merit in including "Fixed" here if F has been populated?
	Period of availability is Num 2.1 whereas in EIEP1 Num 2 is used.

	<u>Tariff attributes:</u> Unit of measure: please refer to comments above.
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.	There are alternative file formats that are fit for purpose but as mentioned as wide a view as possible is required to be captured by this file format to ensure that the diversity of attributes are included.
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.	The file is Retailer-specific (RETPRCE) and therefore the CUSTOMER should be a subset of RETAILER. With the CSV format, the hierarchical relationships are order-dependant. This adds complexity in terms of consuming the file and potential for misinterpretation. An example of how to structure a CSV file for hierarchical relationships can be found in the Registry Functional Specification's MM-010 file format.
Q5: What are the pros and cons of specifying a JSON format (a) for this EIEP? (b) for other EIEPs both current and future?	Standardisation should be a key consideration in terms of developing and maintaining the protocols. There is merit in using JSON for this voluntary format given the nature of the data being included in the file and the potential for a large number of repeating fields. Most other EIEPs are "flat-file" structure with the exception of EIEP6 and EIEP8. Typical data volumes in these file formats are relatively small (EIEP8 has repeating rows to link the different attributes).