

20 March 2013



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Electricity Authority
PO Box 10041
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Sent by email to: submissions@ea.govt.nz

Electricity Information Exchange Protocols Decisions and Further Consultation

1. Vector welcomes the opportunity to respond to the Electricity Authority's consultation *paper Electricity Information Exchange Protocols - decisions and further consultation*, dated 30 January 2013. No part of this submission is confidential and we are happy for it to be publicly released. Please find Vector's answers to the Authority's consultation questions attached in Appendix A.
2. Vector fully supports the Authority's proposal to make compliance with the Electricity Information Exchange Protocols (EIEPs) 1 – 3 mandatory, and remove reference of EIEP 12 and the Standard Tariff Codes from the Electricity Industry Participant's Code (Code).
3. Vector views that these changes will not only significantly improve the quality and efficiency of information exchanges between distributors and traders, but will also greatly assist distributors' ability to comply with their statutory reporting requirements under the Commerce Commission Information Disclosure regime (see Appendix A).
4. Vector's contact person for this submission is:
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Yours sincerely,

A handwritten signature in blue ink that reads "B. Girdwood".

Bruce Girdwood
Manager Regulatory Affairs

APPENDIX A: Vector's responses to consultation questions

Question No.	General comments in regards to the:	Response
1	<p>Are the EIEP functional specifications drafted clearly, completely and accurately? Please provide any comments you may have that would improve the drafting, specifying which EIEP(s) you are referring to.</p>	<p>Yes.</p> <p>All EIEPs - Header row The proposal is for "sender" to be 50 characters; four are currently in use.</p> <p>Vector recommends that this be reduced to approximately 10 characters to enable the readability of the header when files are opened manually.</p> <p>EIEP1</p> <p>1. New names</p> <p>Vector considers that the proposal to introduce new names of the normalised billing methodologies will result in continued confusion. Vector's view is that it would make more sense to use names which align with the <i>normalisation</i> process. For example, it would be more efficient to align the names with the billing undertaken by the retailers, or the electricity usage filed with the Reconciliation Manager. To this end, Vector strongly recommends that the Authority consider the following alternatives:</p> <ul style="list-style-type: none"> • "As Billed Normalised" instead of Incremental Normalised; • "RM Normalised" instead of Replacement Normalised; and • "Incremental RM Normalised" instead of Incremental Replacement Normalised. <p>2. Business requirements 13</p> <p>Vector recommends that this be expanded to show exceptions, such as billed files.</p> <p>3. Business requirements 17.</p> <p>Vector has experienced issues with some traders sending R files that do not cover all the ICPs submitted in the I files. The R file could be sent several months after the</p>

		<p>original I file has been processed and invoiced.</p> <p>We therefore suggest the following wording around the R files: "recipient must remove and replace the data pertaining to the ICPs within the R file".</p>
2	Do you agree with the proposal described in section 5? If not, please explain the reasons why you disagree.	Yes.
3	If the proposal proceeds, do you agree with the proposed approach to amend the Code? If not, please explain the reasons why you disagree.	Yes.
4	Do you agree with the problem definition set out in this section? If not, please explain the reasons why you disagree.	Yes.
5	Do you agree with the cost and benefit assumptions used in the CBA? If not, please explain your reasons.	Yes. There will be an additional benefit as the more prescriptive definitions will mean that the interpretation of the parties should be the same.
6	Do you agree with the results delivered by the CBA? If not, please explain your reasons.	Yes.
7	Do you support the proposal set out in this section that would require compliance with the billing information EIEPs in certain cases? If not, please explain your reasons.	<p>Yes. Mandatory compliance with the exchange of billing information will not only improve the consistency and accuracy of information exchanges between distributors and traders, but it will also help distributors meet their statutory reporting requirements under the Commerce Commission's Information Disclosure regime.</p> <p>Distributors are required to report on billed quantities and line charge revenues. This reporting needs to be accurate, subject to assessments of materiality. Hence inaccurate data provided by retailers could affect the ability of distributors to comply with their information disclosure obligations.</p>
8	What comments do you have on the information and analysis provided in	None.

	the regulatory statement?	
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