

Appendix B Format for submissions

Submitter	Contact Energy
Questions	Comments
<p>Q1. Do you agree that introducing a regulated EIEP4A will address the issues with EIEP4 described above in 2.6?</p>	<p>Partially – Contact considers that there are suitable mechanisms in place under the existing EIEP4 functionality and while creating an abbreviated second format may assist some participants, it will also create additional costs for parties that have already invested in suitable daily incremental EIEP4 functionality.</p> <p>There should also be appropriate rules and expectations set with distributors who receive the information as there doesn't seem to be any mandate around due care for recipients of this information. I.e. distributors could simply receive and discard/ignore the information which makes the protocol pointless.</p>
<p>Q2. If you are a retailer or distributor, does limiting the data provided in the proposed EIEP4A to only medically dependant status at the ICP level meet your operational needs? If not, what additional data would you suggest?</p>	<p>N/A – we already have functionality to enable timely updates in relation to MDC information changes. A second abbreviated protocol will simply introduce unnecessary cost for us.</p>
<p>Q3. Should the use of the EIEP transfer hub be mandatory?</p>	<p>The EIEP hub would be a logical location to facilitate any protocol, however we also don't want to limit future innovation. The primary focus should be that the transfer mechanism is robust and secure (no emails).</p>
<p>Q4. Do you agree with the objective of the proposed form? If not, why not?</p>	<p>We agree with the objective, however as mentioned above disagree with the proposed solution.</p> <p>Reiterating our primary concerns that mandating EIEP4A will create unnecessary cost for us and also that the objective still doesn't have any teeth in terms of distributors using the information to keep MDC's or vulnerable customers better informed during planned maintenance or unplanned outages.</p>

<p>Q5. Have we identified all the main costs and benefits? If not, what are we missing?</p>	<p>The costs and benefits categories look to be covered robustly, however we believe it would be more cost effective to enhance or strengthen the requirements around the existing EIEP4 protocol rather than create EIEP4A.</p>
<p>Q6. Do you agree the benefits of the proposed amendment outweigh its costs?</p>	<p>Not for us personally, we meet the objective today without the need for the EIEP4A protocol. Anything supplementary to this is additional cost.</p>
<p>Q7. Does the proposal adequately address privacy concerns? If not, what additional safeguards should be included?</p>	<p>We consider this would reduce the privacy risk lens, however its somewhat irrelevant as both EIEP4 and EIEP4A would be transmitted via the same mechanism so the risk and privacy point is somewhat moot.</p>
<p>Q8. Do you foresee any practical or technical challenges with implementing ICP-only data exchanges? If so, what mitigations would you propose?</p>	<p>We believe the abbreviated information contained within the new EIEP4A protocol to be lacking in terms of being useful. That is, without the customer information recipients can't really make good use or communicate anything meaningful with the customer (you only have an address and a MDC indicator).</p> <p>You could argue distributors can merge the new EIEP4A information with the existing EIEP4 customer info, however that then contradicts the objective, proposed solution and rationale for delivering a new protocol.</p> <p>MDC statuses often change at the point of a new contract, house move or switch transaction, therefore if you send a new EIEP4A MDC status update the distributor will have no reference or contact details to the customer the information relates to, making the transaction somewhat pointless.</p> <p>Another reason why our preference is to use the existing EIEP4 protocol to facilitate and provide visibility of the complete customer record.</p> <p>Regardless of the solution outcome, any changes will need to be fully understood and scheduled so a sensible implementation lead time should be allocated to avoid disruption to existing programs of work and competing resources. A minimum of 6 months from final decision would be recommended.</p>
<p>Q9. Do you agree the proposed amendment is preferable to the other options? If you disagree,</p>	<p>Our preference is to mandate and bolster the requirements around the existing EIEP4 framework.</p>

please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010.	All participants have implemented some form of functionality to meet the EIEP4 requirements (as is required by distributors in DDA's etc.) and it would be a smaller enhancement or change, as opposed to a new, duplicate interface creation.
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