

**FLICK**

24/01/2025

Electricity Authority

P O Box 10041

Wellington 6143

By email: [ccc@ea.govt.nz](mailto:ccc@ea.govt.nz)

Re: Consultation Paper— EIEP4A Medically Dependent Consumer Information

Flick appreciates the opportunity to provide a submission on the Electricity Authority's proposed EIEP4A Medically Dependent Consumer Information.

We have provided our comments through the attached appendix.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Craig Ironside', with a stylized flourish extending to the right.

Craig Ironside

Head of Customer Service



Appendix A - EIEP4A Medically Dependent Consumer Information

Submitter	Flick Energy Limited
Questions	Comments
Q1. Do you agree that introducing a regulated EIEP4A will address the issues with EIEP4 described above in 2.6?	<p>We believe that mandating EIEP4 would have achieved the same outcome and there is no need for the introduction of EIEP4A. The EIEP4 already has provision to exchange "disconnection restriction" and "Medical restriction type" details.</p> <p>The introduction of EIEP4A will just add operational costs and inefficiencies to the retailers and distributors.</p>
Q2. If you are a retailer or distributor, does limiting the data provided in the proposed EIEP4A to only medically dependent status at the ICP level meet your operational needs? If not, what additional data would you suggest?	<p>We believe that providing the Medical Dependent status at ICP level meets our operational needs. As stated above the current EIEP4 also meets our operational needs.</p>
Q3. Should the use of the EIEP transfer hub be mandatory?	<p>We believe the use of EIEP transfer hub should be mandatory to ensure a consistent approach across the industry. This approach will avoid operational inefficiencies.</p>
Q4. Do you agree with the objective of the proposed form? If not, why not?	<p>We do not agree with the proposed objective of the proposed form as we believe that this could have been easily achieved through mandating EIEP4. Most retailers across the industry already provide this information to distributors through EIEP4.</p>

<p>Q5. Have we identified all the main costs and benefits? If not, what are we missing?</p>	<p>We believe the cost of duplicating the process by sending the same information twice via different EIEPs has not been accounted for. Most retailers already provide this information through EIEP4 .</p>
<p>Q6. Do you agree the benefits of the proposed amendment outweigh its costs?</p>	<p>As stated above we strongly believe that these additional operational costs could have been avoided by mandating EIEP4.</p>
<p>Q7. Does the proposal adequately address privacy concerns? If not, what additional safeguards should be included?</p>	<p>The consultation paper describes how distributors already have access to information which is supposedly the crux of the privacy concerns.</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 that there would be challenges faced both by distributors and retailers as there will be exchange of multiple files especially for those retailers who already provide EIEP4 files to distributors. Further, the Authority's proposals create more confusion and complication by adopting different codes for the same information (currently MDN and MDV in the EIEP4 with the EIEP4A using MDA and MDR).</p>
<p>Q9. Do you agree the proposed amendment is preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010.</p>	<p>We do not prefer the proposed amendment. Our preferred option would have been to mandate the EIEP4 which already has provision to exchange "disconnection restriction" and "Medical restriction type" details.</p>