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To: The Electricity Authority

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

### Genesis supports updating and mandating existing EIEP4

Genesis Energy Limited (**Genesis**) welcomes the opportunity to comment on the Electricity Authority's (**the Authority**) proposal to establish a new Electricity Information Exchange Protocol 4A for information about medically dependent consumers. We support the objectives of the Authority's proposal but believe these could be more efficiently and cost-effectively achieved by updating the existing EIEP4 rather than introducing a new EIEP altogether.

The key problem identified by submitters to the August 2024 consultation on the proposed Consumer Care Obligations was the lack of consistency, which results from the fact the existing EIEP4 is non-regulated and therefore voluntary. We note several of the distributor submitters called for updating and then mandating the existing EIEP4. We agree with their proposal. However, it is not entirely clear to us from the consultation paper why the Authority regards an updated EIEP4 as unsuitable.

We also do not support requiring provision of data at a frequency greater than daily. Requiring real-time updates would require significant process and platform changes for retailers with the result that the costs are likely to outweigh the benefits.

Please find our responses to the consultation questions on page two.

Yours sincerely,

A handwritten signature in black ink that reads "Mitchell Trezona-Lecomte".

Mitch Trezona-Lecomte  
**Senior Advisor, Government Relations and Regulatory Affairs**

## Consultation Questions – Genesis Energy Response

Question	Genesis Response
Q1. Do you agree that introducing a regulated EIEP4A will address the issues with EIEP4 described above in 2.6?	We agree with the issues as identified by the Authority, and that the new EIEP4A could address these issues. However, these issues could be more efficiently and cost-effectively addressed by amending the current EIEP4.
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?	As a retailer, Genesis already provides this data to networks in a full replacement format and at a frequency requested by the network (monthly or weekly). While it would be relatively straightforward to increase the frequency to daily, changing to real-time would be highly costly and complex as it would involve significant process and platform changes.
Q3. Should the use of the EIEP transfer hub be mandatory?	Yes, we agree.
Q4. Do you agree with the objective of the proposed form? If not, why not?	Yes, we agree with the objective. However, we support the alternative option of updating the existing EIEP4 and making it mandatory
Q5. Have we identified all the main costs and benefits? If not, what are we missing?	<p>As noted, requiring real-time updates would impose costs on retailers as it would mean implementing significant process and platform changes. These costs would likely outweigh the benefits of the proposal. Daily should be sufficient and would be far easier to implement.</p> <p>We believe updating the existing EIEP4 would be a more cost-effective way to achieve the Authority's objectives and realise the benefits identified.</p>
Q6. Do you agree the benefits of the proposed amendment outweigh its costs?	No, the costs are likely to outweigh the benefits, particularly if provision of data in real-time is required (as noted). Our key point is that the benefits identified could be achieved at materially lower cost by updating the existing EIEP4. It is not clear from reading the consultation paper why the Authority regards an updated EIEP4 as unsuitable.
Q7. Does the proposal adequately address privacy concerns? If not, what additional safeguards should be included?	It is unclear how the proposed EIEP4A improves privacy, as the existing EIEP4 already enables provision of personal information and MedDep status. Noting the privacy risks identified by the Authority, privacy could be slightly improved if the "Medical Restriction Type" field in EIEP4 was updated.
Q8. Do you foresee any practical or technical challenges with implementing ICP-only data exchanges? If so, what mitigations would you propose?	There are potential risks resulting from operationalising both EIEP4 and EIEP4A alongside each other. If delivered at different frequencies, there is the risk electricity distributors could match the ICP MedDep status to the incorrect consumer. If the Authority progresses with a new EIEP4A, the mitigation to this risk could be to include the same consumer or customer identifier in EIEP4 and EIEP4A to enable validation.
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	No, we recommend the Authority progress with its alternative option of updating the existing EIEP4. Making EIEP4 a regulated format, and mandating use of the EIEP transfer hub at a specified frequency requested by the network (monthly, weekly, or daily). Updating and mandating EIEP4 would be more cost-effective, consistent with the Authority's statutory objective to promote the efficient operation of the industry.