

21 January 2025

Electricity Authority

By email: ccc@ea.govt.nz

Proposed Consumer Care Obligations

Meridian appreciates the opportunity to provide comment on the Electricity Authority's (Authority) consultation on the proposed Electricity Information Exchange Protocol – EIEP4A: Medically Dependent Consumer (MDC) Information.

Meridian supports better outcomes for consumers

Meridian supports delivering better outcomes for consumers and considers that implementing an industry standard approach to the exchange of MDC status information between retailers and distributors will help achieve this.

Authority should determine required file type

In general, we support the Authority's efforts to standardise the method of exchanging MDC information by implementing the proposed EIEP4A. However, to simplify implementation of the Code amendments in what is a relatively short time period, we suggest that the Authority select and mandate the file type by which MDC status information will be provided (i.e. on a replacement or incremental basis). This will afford the retailers time to focus on other aspects of the implementation without having to agree this format with 29 distributors before 1 April 2025.

Concluding remarks

This submission is not confidential and can be released in full. I can be contacted to discuss any of the points made.

Nāku noa, nā

Debby Abrahams
Senior Legal Counsel

Appendix D Submission in respect of consultation questions

Submitter	Meridian Energy Limited
------------------	--------------------------------

	Question	Meridian submission
1.	Do you agree that introducing a regulated EIEP4A will address the issues with EIEP4 described above in 2.6?	The proposed EIEP4A will address the issues with EIEP4 only insofar as it relates to MDC status information. Other issues with EIEP4, as identified in the consultation paper, will remain.
2.	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?	Yes.
3.	Should the use of the EIEP transfer hub be mandatory?	Yes. Use of the EIEP transfer hub will ensure consistent sharing of MDC information across the industry.
4.	Do you agree with the objective of the proposed form? If not, why not?	Yes.
5.	Have we identified all the main costs and benefits? If not, what are we missing?	No comment.
6.	Do you agree the benefits of the proposed amendment outweigh its costs?	Yes. Meridian supports improving efficiency in the industry for the long term benefit of consumers and agrees that the benefits of implementing EIEP4A outweigh the costs.
7.	Does the proposal adequately address privacy concerns? If not, what additional safeguards should be included?	Yes.
8.	Do you foresee any practical or technical challenges with implementing ICP-only data exchanges? If so, what mitigations would you propose?	No, Meridian does not foresee any challenges with implementing ICP-only data exchanges.
9.	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.	Yes. The alternative option of continuing to use EIEP4 for sharing MDC status information is not sustainable nor a viable option for the reasons set out in the consultation paper.