

28 January 2025
Electricity Authority
PO Box 10041
Wellington 6143

Submitted via email to ccc@ea.govt.nz

Orion submission – Medically Dependent Consumer Information (EIEP4A)

Introduction

- 1 Orion welcomes the opportunity to submit on the consultation paper 'EIEP4A Medically Dependent Consumer Information.'¹
- 2 This submission is not confidential and can be publicly disclosed.
- 3 Orion owns and operates the electricity distribution infrastructure in central Canterbury, including Ōtautahi Christchurch city and Selwyn District. Our network is both rural and urban and extends over 8,000 square kilometres from the Waimakariri River in the north to the Rakaia River in the south; from the Canterbury coast to Arthur's Pass. We deliver electricity to more than 228,000 homes and businesses and are New Zealand's third largest Electricity Distribution Business (EDB).
- 4 We have reviewed the consultation paper, and our specific responses to the questions posed by the Authority as well as other feedback we consider appropriate to the consultation are set out in [Appendix A](#).

Key submission point

- 5 Orion supports the Authority's proposal to introduce a regulated EIEP4A format for medically dependent consumer information. We believe this represents a workable solution that will allow for consistent and reliable MDC data exchange between retailers and distributors. While we support the core proposal, we have suggested several technical enhancements to the EIEP4A format that would further strengthen its effectiveness, particularly around submission timeframes and retailer switching processes. These enhancements would help ensure continuous visibility of MDC status while maintaining simplicity in the underlying data exchange.

Concluding remarks

- 6 If the Authority has any questions or queries on aspects of this submission which you would like to discuss, please contact me on 03 363 9898.

Yours sincerely,



Connor Reich

Regulatory Lead – Electricity Authority

¹ [EIEP4A Medically Dependent Consumer Information](#)

Appendix A

Submitting organisation	Orion New Zealand Limited (“Orion”)
Contact person	Connor Reich
Contact email	Connor.Reich@oriongroup.co.nz

Questions	Comments
Q1. Do you agree that introducing a regulated EIEP4A will address the issues with EIEP4 described above in 2.6?	<p>Yes, Orion submits that introducing a regulated EIEP4A will address the issues identified with EIEP4. The proposed regulated format will address the identified issues while providing a consistent framework for industry participants.</p> <p>We previously outlined our concerns with EIEP4 in our response to the Consumer Care Obligations consultation.² We appreciate the Authority’s incorporation of industry feedback in developing these obligations.</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>Orion submits that limiting the data to only medically dependent status will meet our operational needs.</p> <p>However, to enhance its effectiveness, we suggest that the Authority consider:</p> <ul style="list-style-type: none"> • Establishing mandatory submission timeframes for the EIEP4A (e.g. daily, weekly intervals). We note that clauses 51(a)(1)(i) and 51(a)(1)(ii) have different requirements as to when a retailer must submit an updated EIEP4A. • Adding new fields to capture: <ul style="list-style-type: none"> ○ whether the EIEP4A notification is because an application has been received (clause 51(a)(1)(i)). ○ whether a retailer has accepted or declined a consumers’ MDC status – clause (51(a)(1)(ii)). ○ the date the retailer has accepted the MDC status. ○ the date the retailer has declined an MDC status. • Evaluating whether a new EIEP4A is required to be submitted by both the gaining and losing retailers, when an MDC switches retailers, and how to manage potential timing gaps during that transition.
Q3. Should the use of the EIEP transfer hub be mandatory?	Yes, Orion submits in support of making the use of the EIEP transfer hub mandatory.

² [Orion submission: Consumer Care Obligations](#), pages 6-7

<p>Q4. Do you agree with the objective of the proposed form? If not, why not?</p>	<p>Orion submits that we agree with the objective of the proposed form.</p>
<p>Q5. Have we identified all the main costs and benefits? If not, what are we missing?</p>	<p>Orion submits that the main costs and benefits have been accurately captured by the Authority.</p>
<p>Q6. Do you agree the benefits of the proposed amendment outweigh its costs?</p>	<p>Orion submits that the benefits of the proposed amendment outweigh its costs.</p>
<p>Q7. Does the proposal adequately address privacy concerns? If not, what additional safeguards should be included?</p>	<p>Orion submits that the proposal adequately addresses 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>Orion submits that it does not foresee any practical or technical challenges with implementing ICP-only data exchanges.</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>Orion submits that the proposed amendment is preferable to other options.</p>