

28 January 2025

Electricity Authority
Level 7
AON Centre
1 Willis Street
Wellington 6011

Via email: ccc@ea.govt.nz

Proposed Electricity Information Exchange Protocol – EIEP4A: Medically Dependent Consumer Information – Consultation paper

Introduction

The Lines Company (TLC) appreciates the opportunity to provide feedback on the Electricity Authority's (Authority) consultation paper. The Authority is seeking feedback on the proposed EIEP4A to support retailers' upcoming obligations under the Consumer Care Obligations (Obligations) to share information with distributors about medically dependent consumers on their networks. The requirement to share information about medically dependent consumers comes into effect on 1 April 2025.

Summary

TLC is fully supportive of the consistent, reliable and timely exchange of medically dependent consumer information between retailers and distributors, while safeguarding consumer privacy and data security – *but we oppose the introduction of a new EIEP4A.*

*The Authority says*¹ it is addressing industry concerns that the existing EIEP4: Customer information (EIEP4), which is currently voluntary, is not fit for this purpose because of:

- inconsistent application across the sector
- delayed or outdated data, with some retailers providing insufficiently frequent updates
- incomplete or irrelevant data that does not align with privacy requirements or operational needs
- a lack of data standards for accuracy, frequency and privacy safeguards.

TLC's experience

TLC's experience with retailer EIEP4 files has generally been positive, with retailers providing good quality data in a timely manner. Most retailers adhere to the specified requirements and regularly submit the files as agreed upon in our Use of System Agreement (Conveyance).

Conclusion

TLC does not support the implementation of a new EIEP. It is considered unnecessary and duplicative, and improving the existing EIEP4 (Customer Information Non-regulated) would achieve the same objective.

For further information, please contact Craig Donaldson on craig.donaldson@thelines.co.nz.

Yours sincerely

Craig Donaldson
Pricing & Regulatory Specialist

¹ [Proposed Electricity Information Exchange Protocol – EIEP4A: Medically Dependent Consumer Information](#), page 2.

Appendix: Format for submissions

| Submitter | The Lines Company Limited (TLC) |
|---|---|
| Questions | Comments |
| Q1. Do you agree that introducing a regulated EIEP4A will address the issues with EIEP4 described above in 2.6? | We oppose introducing a regulated EIEP4A. Instead, we believe it is more practical to add the requirements to the existing EIEP4 and regulate that. |
| 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? | No, our operational needs cannot be met solely with an EIEP4A. TLC requires EIEP4 information, and the proposed file may cause duplication and potential errors in data alignment. |
| Q3. Should the use of the EIEP transfer hub be mandatory? | Yes, TLC supports the EIEP transfer hub being mandatory for regulated EIEPs for consistency and security. |
| Q4. Do you agree with the objective of the proposed form? If not, why not? | The goal is to ensure the consistent, reliable, and timely exchange of information regarding medically dependent consumers, in accordance with the Obligations. This objective can be achieved by regulating the EIEP4. |
| Q5. Have we identified all the main costs and benefits? If not, what are we missing? | The Authority has not taken into account that many distributors already receive EIEP4 files and have established processes for handling them. The introduction of both EIEP4 and EIEP4A results in redundant data processing and unnecessary duplication of information. |
| Q6. Do you agree the benefits of the proposed amendment outweigh its costs? | As above. |
| Q7. Does the proposal adequately address privacy concerns? If not, what additional safeguards should be included? | The Privacy Act is comprehensive, and all organisations should comply with its requirements. We do not consider additional safeguards necessary; however, mandating hub transfer is a prudent measure. |
| Q8. Do you foresee any practical or technical challenges with implementing ICP-only data | TLC will continue to require EIEP4 files for customer distributions, communications, etc. Adding another file (EIEP4A) would create unnecessary complexity, potential errors require additional data storage and new processes for some distributors where current processes are fit-for-purpose. |

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| exchanges? If so, what mitigations would you propose? | |
| 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>TLC's preferences include:</p> <ul style="list-style-type: none"> • Regulating EIEP4 • Add necessary requirements to align with the Consumer Care Obligations • Mandate EIEP4 file sharing timing (whether they are replacement or incremental) • Mandate EIEP4 file transfer via the hub |