



17 February 2025

Electricity Authority
PO Box 10041
Wellington 6143

Via email: ccc@ea.govt.nz

Consultation Paper – Electricity Information Exchange Protocol – EIEP4A: Medically Dependent Consumer Information

The WEL Networks appreciates the opportunity to provide feedback on the proposed mandating of an EIEP for medically dependent consumer information.

WEL Networks (WEL) is New Zealand's sixth largest electricity distribution company and is 100% owned by our community through our sole shareholder WEL Energy Trust. Our guiding purpose is to enable our communities to thrive, and we work to ensure that our customers have access to reliable, affordable, and environmentally sustainable energy.

Our responses to the specific questions sought by the Authority are attached.

In general, WEL is supportive of the creation of a mandated EIEP file format for the exchange of medically dependent consumer information. We do believe though that the omission of customer contact information will limit the potential additional consumer benefits that distributors may wish to add in the future.

Should you require clarification on any part of this submission, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in blue ink that reads 'Andrew Maseyk'.

Andrew Maseyk

MEP Operations Manager

M +64 21 984 347 DDI +64 7 850 3375

E andrew.maseyk@wel.co.nz





Submitter	WEL Networks
------------------	---------------------

Questions	Comments
Q1. Do you agree that introducing a regulated EIEP4A will address the issues with EIEP4 described above in 2.6?	Yes, in respect of the timeliness of the data intended to be supplied in new EIEP4A
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>By not including customer information in the EIEP4A, this change does not address the main failing of the current non-regulated EIEP4 process – that is inconsistent and/or outdated supply of currently provided customer information.</p> <p>To realise the full value of having MDC information, the new EIEP4A will need to be matched with the existing EIEP4 customer data, creating a potential mismatch of up-to-date MDC flagging, but outdated customer information.</p> <p>For distributors notifying consumers of outages, this disjoint in information between the MDC status and the current consumer onsite will add further complexity.</p> <p>A solution to this could be to include accurate customer information within the new EIEP4A, or to mandate that existing EIEP4 files must be sent on the same frequency as the new EIEP4A.</p>
Q3. Should the use of the EIEP transfer hub be mandatory?	Yes, the whole reason for its creation was to provide a single industry wide transfer mechanism for mandated EIEP files.
Q4. Do you agree with the objective of the proposed form? If not, why not?	Yes
Q5. Have we identified all the main costs and benefits? If not, what are we missing?	Yes



<p>Q6. Do you agree the benefits of the proposed amendment outweigh its costs?</p>	<p>Without accurate and timely customer contact information, the benefits of receiving this data are limited.</p>
<p>Q7. Does the proposal adequately address privacy concerns? If not, what additional safeguards should be included?</p>	<p>Potentially the concerns are overstated as Retailers are already sharing customer data with Distributors (including medically dependent customer information). If the real concern is how distributors may use the customer contact data, then this could be addressed by explicitly outlining the purpose in the EIEP4A.</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>While not all distributors may wish to receive and use customer contact information, it is a reasonably cost-free exercise to ignore and destroy unneeded data, however exclusion of customer contact data restricts any potential developments for distributors who would provide enhanced protections to medically dependant customers.</p> <p>Provision of customer contact data in the new EIEP4A (the extent of which is limited to customers who have declared as medically dependant), seems to be a cleaner, more efficient option than requiring distributors to individually negotiate with retailers for the provision of EIEP4 files (which contain all customers) in conjunction to the EIEP4A.</p> <p>This may even lead to less data being exchanged on the whole as the existing EIEP4 could cease to sent except for distributors who need the full customer set of data for outage management and ad hoc requests (trust elections, customer surveys etc).</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>Only to the extent that the only other option presented is the status quo. No evidence is given that other changes (e.g. refining and mandating existing EIEP4) have been assessed.</p>

