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Dear Carolina,

Consultation Paper – EIEP4A: Medically dependent consumer information

Wellington Electricity Lines Limited (WELL) appreciates the opportunity to provide a submission on the *Proposed Electricity Information Exchange Protocol – EIEP4A: Medically Dependent Consumer Information* consultation and has responded to the EA's questions overleaf.

WELL is not opposed to EIEP4A. However, as discussed earlier this month over the phone, the usefulness of medically dependent consumer (MDC) data will, in most cases, be limited for us given that we are not typically responsible for notifying consumers of outages.

We are grateful for the time and consideration that the EA has already taken in corresponding with us in relation to the Consumer Care Obligations and EIEP4A. If you'd like to discuss this submission in more detail, please email Ben Tuifao-Jenkinson, Economic Regulation & Pricing Specialist at ben.tuifaojenkinson@welectricity.co.nz.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'G Skelton', is written over a light blue horizontal line.

Greg Skelton
Chief Executive Officer

Submitter	Wellington Electricity
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Questions	Comments
Q1. Do you agree that introducing a regulated EIEP4A will address the issues with EIEP4 described above in 2.6?	No, as EIEP4 itself will not be mandated. However, publishing EIEP4A as a regulated EIEP will help ensure that distributors receive the MDC information consistently and in a timely manner.
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?	Yes. However, WELL may be required to cross-reference EIEP4A with EIEP4 should there be a rare instance where it is prudent to obtain and utilise an MDC customer's name and contact details outside of the normal interposed distributor/trader relationship. However, we do not anticipate needing to do this to comply with the Consumer Care Obligations.
Q3. Should the use of the EIEP transfer hub be mandatory?	Yes, for system integration and data security reasons.
Q4. Do you agree with the objective of the proposed form? If not, why not?	At a high level, yes. However, it is unclear how distributors are expected to use EIEP4A when planning and undertaking work on their networks. In our view, the processes ¹ that distributors have in place to coordinate with <i>retailers who are traders</i> ² on planned and unplanned outages affecting MDCs ensure compliance with clause 60(1) of the Consumer Care Obligations without the need for EIEP4A. While WELL's DDA does not distinguish between MDCs and non-MDCs for the purpose of service interruption communication requirements, MDCs are essentially covered under the definition of 'Customer'. As such, there does not seem to be an obligation to "use [EIEP4A] when planning and undertaking work on the network" for those distributors who are not responsible for notifying consumers of outages. WELL is currently assessing EIEP4A use cases but consider these to be limited.

¹ As set out in Schedule 5 of the default distributor agreement (DDA).

² While clause 60(1) uses the term "retailer" over "trader", the EA confirmed to WELL in December 2024 that the clause must be read alongside clause 51(1), under which only a trader can advise a distributor of MDC applications.

<p>Q5. Have we identified all the main costs and benefits? If not, what are we missing?</p>	<p>Yes.</p>
<p>Q6. Do you agree the benefits of the proposed amendment outweigh its costs?</p>	<p>At an industry level, yes – with most benefit to those distributors who are responsible for notifying consumers of outages, as these parties would be more likely to regularly utilise EIEP4A via the systems and processes they already have in place under EIEP4.</p>
<p>Q7. Does the proposal adequately address privacy concerns? If not, what additional safeguards should be included?</p>	<p>While the ICP identifier/MDC fields combination may be considered ‘personal information’³, the privacy implications associated with the current use of EIEP4 for identifying MDCs are mitigated to what is likely the maximum extent possible (that is, to enable collection of the necessary data required for the protocol to meet its purpose).</p> <p>However, as both EIEP4 and EIEP4A datasets are available and may be legitimately combined by distributors to obtain MDC customer names and contact details, privacy concerns may still remain.</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>Yes, as a system solution may be required should WELL need to cross-reference EIEP4A with EIEP4.</p> <p>WELL also recommends a consistent approach in respect of whether traders provide a ‘snapshot’ (replacement) file vs. an ‘incremental’ (partial replacement) file to avoid traders and distributors from having to agree different file types across the vast number of both participant types.</p> <p>WELL’s preference would be to receive complete ‘snapshot’ (replacement) files.</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>Yes. However, as mentioned, WELL has limited use for EIEP4A and would likely only occasionally utilise it under specific use cases.</p> <p>Our view is that our existing processes put retailers in the best position to have sole responsibility for providing care and consideration to MDCs, as supported by UDL’s submission on the Proposed Consumer Care Obligations⁴.</p>

³ What is personal information? | Office of the Privacy Commissioner
<https://privacy.org.nz/tools/knowledge-base/view/199>

⁴ Submission by Utilities Disputes Limited | Electricity Authority – Proposed Consumer Care Obligations
https://www.ea.govt.nz/documents/5655/Utilities_Disputes_Limited_KI2a2Te.pdf