



Submissions Summary and Next Steps

Gas Information Exchange Protocols

August 2025



Gas Industry Co.



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1. Introduction and next steps

This paper summarises industry submissions from the consultation on Gas Information Exchange Protocols (GIEPs), which took place from 16 May 2025 to 13 June 2025.

The consultation asked participants for feedback regarding proposed new and existing voluntary GIEPs.

We received submissions from:

- Contact Energy
- Genesis
- Powerco
- Bluecurrent

We also received informal feedback from Mercury.

Some of the proposed new voluntary GIEPs relate to gas industry developments, while others relate to areas where additional Electricity Information Exchange Protocols (EIEPs) have been developed over time and the addition of an equivalent GIEP for the gas industry participants may enhance efficiency of gas industry processes.

For further detail relating to the rationale for each proposed GIEP, please refer to the consultation paper.

Next steps

Below outlines next steps in the process following this report.

1. **Drafting** – Protocols prepared by GIC with reference to the Decision Framework (Section 2)
2. **Review** – Drafted protocols circulated for feedback and discussion
3. **Finalisation** – Protocols finalised and shared for final comment
4. **Publication** – Approved and published



2. Decision framework – voluntary protocols, proposed and existing

| Protocol | Status | Data flow | Gas Industry Co initial view ¹ | Submission summary |
|---|----------|--|---|---|
| GIEP1 – Network detail consumption information | In place | Retailer → Distributor Distributor → Retailer | Amend | Clarity for units of measure and decimal precision |
| GIEP2 – Network summary consumption information | In place | Retailer → Distributor Distributor → Retailer | Amend | Clarity for units of measure and decimal precision |
| GIEP4 – Customer information | Proposed | Retailer → Distributor | Develop | All submissions support adding protocol because it provides key customer information. Some scope to discuss additional fields. |
| GIEP4A – Medically Dependent Customer Information | Proposed | Retailer → Distributor | Include in GIEP4 | All submissions do not support adding as a separate protocol but do support including this into EIEP4. |
| GIEP5A – Planned Service Interruptions | Proposed | Distributor → Retailer | Develop | Submissions neutral or not supportive. Planned gas outages different to electricity. More value consideration needed. |
| GIEP5B – Unplanned Service Interruptions | Proposed | Distributor → Retailer | Develop | Retailers not supportive, but distributor sees value. Gas outages different to electricity. More value consideration needed. |
| GIEP7 – General installation status change | In place | Retailer → Distributor | Test if still relevant | One retailer questioned the value of this protocol |
| GIEP8 – Network price category and tariff change | In place | Retailer → Distributor | Amend | One retailer comment Rationale/reason field could be added. For example, help gas pipeline businesses understand reason for request. E.g. “site converted from residential to business”, or “Residential standard user now a low user”, or “meter downgraded”. |
| GIEP12 – Delivery price change notification | Proposed | Distributor → Retailer | Develop | All submissions support adding this into an EIEP12 gas equivalent. |

¹ Protocols to develop or amend is our starting point for drafting purposes. This position is subject to change during drafting and development as we work through issues raised by submissions.

| Protocol | Status | Data flow | Gas Industry Co initial view ¹ | Submission summary |
|--|----------|--------------------------------------|--|--|
| | | | | Key considerations raised include: aligning closely with electricity, standardised of units of consumption, and for protocol usage to exclude individually priced sites. |
| GIEP13A – Detailed consumption information | Proposed | Retailer → Consumer (or their agent) | Develop | <p>All submissions support adding a EIEP13A gas equivalent.</p> <p>Key considerations raised include: current customer volumes considered low, could become more useful in future, and in electricity the peak vs off peak pricing incentives are a key driver and this does not exist in gas.</p> |
| EIEP13B – Summary consumption information | Proposed | Retailer → Consumer (or their agent) | Develop | <p>All submissions support adding this into an EIEP13B gas equivalent.</p> <p>Customer volumes are considered to be low, albeit one retailer has recently used EIEP13B as a template for a gas data request. Further discussion to determine value, e.g. in electricity the peak vs off peak pricing incentives are a key driver, and this does not exist in gas</p> |
| GIEP13C – Request file for EIEP13 and EIEP13B | Proposed | Consumer (or their agent) → Retailer | <p>Develop</p> <p>Subject to EIEP13A and EIEP13B development</p> | <p>All submissions are supportive.</p> <p>Consumer number should also be considered.</p> |
| Procedures for requests for consumer consumption information | Proposed | Consumer and retailer process | Develop | Either no comment or general comments provided in submissions. |



3. Individual submissions and our responses

3.1 Proposed protocols

3.1.1 GIEP4 – Customer information

Proposal

Extend *Electricity Information Exchange Protocol 4 (EIEP4) – Customer Information* to gas with modifications.

Data flow: Retailer to Distributor

Does industry support this proposal?

| Participant | Support | Comments | GIC response |
|-------------|---------|--|--|
| Contact | Yes | We see benefit in distributors (and other 3rd party providers) having access to customer information to enable better communication and safer outcomes for contractors attending site. | Consideration will be given to the scope of customer information during the development phase. Consideration to be given to data confidentiality. |
| Genesis | Yes | EIEP4 provides a single, complete, accurate, and secure file of customer related data. Customer contact details have been helpful to gas pipeline businesses (i.e. Powerco) when doing planned outages so they can coordinate with customers. | Acknowledged |
| Mercury | Yes | Generally supportive of all proposals | Acknowledged |
| Powerco | Yes | We support introduction of a gas equivalent to EIEP4 as this is key baseline customer information. Consistency between electricity and gas would be beneficial. | Acknowledged |
| Bluecurrent | Yes | No comment | No comment |

Related comments

Implementation, amendments and other concerns

| Participant | Comments | GIC response |
|-------------|--|---|
| Contact | <p>Contact has EIEP4 functionality and exchanges in place with a number of distributors already. Within reason (depending on final requirements) any changes should be relatively minor for Contact to implement.</p> <p>Proposed fields look ok as a starter point; however, we consider the overarching EIEP4 requirements need a wider lens and assessment (noting the starting position of the Electricity equivalent protocol hasn't been reviewed for some time).</p> <p>As mentioned above, a more holistic lens should be applied to any changes or considerations surrounding EIEP4 functionality. The electricity industry recently missed an opportunity to implement a single format or protocol to inform or drive good industry outcomes. I.e. introducing EIEP4a actually resulted in unnecessary cost/complexity for all retailers due to only a small number of distributors wanting EIEP4a. Further EIEP4a feedback provided below.</p> <p>We also consider there is the opportunity to include additional useful information within this protocol, along with the potential for having a retailer to meter equipment provider channel also. I.e. Additional hazard information would be useful (Dog, site hazards etc.) to improve contractor H&S outcomes.</p> | <p>We plan to align the protocol as closely to electricity as practicable to minimise negative impacts on uptake.</p> <p>We can consider this within the development phase.</p> <p>Consideration will be given to the scope of customer information during the development phase.</p> |
| Genesis | <p>Would the Medically Dependent status reflect dependency on gas only? and/or electricity?</p> <p>Mechanism: Must be secure (i.e. secure file transfer protocol, SFTP)</p> <p>Frequency: Send monthly/weekly</p> | <p>MDC status would reflect gas only; this is a gas protocol.</p> <p>Mechanism currently used in gas are SFTP, this would continue with any proposed gas protocols including this one.</p> <p>Frequency to be proposed and finalised with industry during the development phase.</p> |

| | | |
|-------------|--|--------------|
| Mercury | <p>'Cost v benefit' in terms of what it will cost us to build the system requirements, versus the potential benefit</p> <p>Main concern was just ensuring that we have enough lead time once a decision is made so that we have time to implement.</p> | Acknowledged |
| Powerco | No comment | No comment |
| Bluecurrent | Gas retailers and distributors are best placed to determine the cost of any system changes to implement GIEP4. | Acknowledged |

3.1.2 GIEP4A – Medically Dependent Consumer Information

Proposal

Extend *Electricity Information Exchange Protocol 4 (EIEP4A) – Customer Information* to gas with modifications

Data flow: Retailer to Distributor

Does industry support this proposal?

| Participant | Support | Comments | GIC response |
|-------------|---------|---|--|
| Contact | No | <p>We don't consider EIEP4a is useful and having a second protocol creates unnecessary costs and complexity for no benefit. The costs outweigh the benefits. Provision of the Medically Dependent Customer (MDC) indicator alone is pointless without the supporting customer information (what would a distributor do with the MDC indicator alone).</p> <p>The existing EIEP4a protocol that was mandated by the EA was rushed and therefore missed the mark, particularly where retailers and distributors already had a more comprehensive EIEP4 mechanism in place but still had to implement EIEP4a to meet a Code mandate.</p> <p>The electricity solution had several other shortfalls/limitations (no practical regulatory flexibility, some privacy risk, no teeth in requiring distributors to apply due care and use the information, potential timing issues that meant up to date MDC information wouldn't be available).</p> | <p>We will consider the value of a gas equivalent EIEP4A bearing in mind this information is already captured in a gas equivalent EIEP4.</p> |
| Genesis | No | <p>A second format containing customer's personal identifiable information (PII) is not our preference as it doubles the number of files being transferred with PII. EIEP4a is an incomplete data set, that requires addition of EIEP4 to meet some EDB/GPB requirements.</p> | |

| | | | |
|-------------|-----|--|---|
| | | Implementation/Structure/format of EIEP4a largely opposed by most submissions during consultation, with participants and working group reps indicating a preference to improve EIEP4. | |
| Mercury | Yes | Generally supportive of all proposals | Acknowledged |
| Powerco | No | <p>It is our view that EIEP4A is not relevant in a gas context in any case.</p> <p>We query if EIEP4A (medically dependent consumer information) is relevant. Customers who are medically dependent on electricity are unlikely to be medically dependent on gas i.e. we are not aware of any gas specific service or appliance that would be associated with this classification.</p> <p>Checking relevance is important as distributors holding this sensitive information require specific systems to manage privacy.</p> <p>In electricity, EIEP4A was separated as EIEP4A is mandatory and EIEP4 voluntary. They could be combined if both were mandatory. For gas, they could be combined if both are voluntary.</p> | <p>This was debated at length when Gas Industry Co consulted on the gas Consumer Care Guidelines with some consumer groups having strong views on this matter.</p> <p>We are also not aware of any specific examples where gas is required by medically dependent customers. However, we cannot rule out that an example could exist (for example, using a stove for heating water or some item of medical equipment). Ultimately whether a consumer requires gas for critical medical support is a matter for the judgement of a medical professional. What we can do is have a process in place if an instance does arise.</p> <p>We maintain that it remains important to provide a safety net for vulnerable customers that we have not yet considered. Having a flag in customer information protocols covers this.</p> <p>We also note that this would be a voluntary protocol.</p> |
| Bluecurrent | Yes | No comment | No comment |

Related comments

Implementation, amendments and other concerns

| Participant | Comments | GIC response |
|-------------|---|---|
| Contact | Our preference is to incorporate any additional/supplementary information into the existing EIEP4 protocol. Recommend discussing further with key industry parties before finalising requirements and implementing anything. | Acknowledged |
| Genesis | Better to properly specify EIEP4 and remove 4a. Would this be medically dependent on gas supply? And/or electricity? If gas pipeline businesses are unanimous in not needing EIEP4 CUSIN data then EIEP4a on a monthly or weekly basis (not daily or as changed) will be sufficient. | Acknowledged This field would be for gas MDCs only. There are a lot of other fields across gas and electricity that we could also consider, and electricity MDCs is already covered by a separate protocol in electricity. Acknowledged |
| Mercury | ‘Cost v benefit’ in terms of what it will cost us to build the system requirements, versus the potential benefit. Main concern was just ensuring that we have enough lead time once a decision is made so that we have time to implement. | Acknowledged |
| Powerco | No comment | No comment |
| Bluecurrent | We note that Gas Industry Co’s first assessment of retailers’ alignment with the gas industry guidelines, including the Gas Consumer Care Guidelines, in 2023 found that: Responses to the self-assessment of alignment suggest that dual fuel retailers are fully or substantially aligned with most aspects of the Guidelines. | Acknowledged |

| | | |
|--|--|--|
| | <p>We particularly note that dual-fuel retailers are either in “full alignment” or “substantial alignment” with the “additional recommendations for medically dependent consumers” that form part of the Gas Consumer Care Guidelines.</p> <p>We look forward to Gas Industry Co’s future assessment(s) of retailers’ alignment with the gas industry guidelines covering all gas retailers.</p> | |
|--|--|--|

3.1.3 GIEP5A – Planned Service Interruption

Proposal

Extend *Electricity Information Exchange Protocol (EIEP5A) – Planned Service Interruptions* to gas with modifications.

Data flow: Distributor → Retailer

Does industry support this proposal?

| Participant | Support | Comments | GIC response |
|-------------|---------|--|--|
| Contact | Neutral | Maybe – voluntary use feels like the right starting approach. Like everything else, the protocol might be useful if there is a robust need or reasonable volume of customers that would benefit from the notifications, however this would need to stack up to justify the implementation effort and costs. | When we assessed retailer alignment with Gas Consumer Care Guidelines, one retailer considered that the absence of a GIEP equivalent to EIEP5A would impact the ability of retailers to align the requirement that retailers and distributors have processes to coordinate planned service disruptions that will impact MDCs. From the feedback that we have received here, it seems that there may already be processes in place, perhaps through use-of-system agreements, and there may be no need to prescribe the form of information exchange through a new GIEP. We would like to test this further with submitters before proceeding to the development phase. |
| Genesis | Neutral | These are usually notified by gas pipeline businesses to customer, so would likely only be as a PLI. Reinforces helpfulness of EIEP4 data to networks who may need to contact customers for planned outages. | |
| Mercury | Yes | Generally supportive of all proposals | |
| Powerco | No | We do not see benefit in a gas equivalent to EIEP5A. The process for planned interruptions differs significantly for gas compared to electricity. For gas, it is not common practice to interrupt supply to individual (or multiple ICPs at the same time) for planned maintenance. For example, in the case of network mains renewal, a project can span weeks/months, but ICP transfer happens on an ICP-by-ICP basis throughout the process. Timing of impact for each individual ICP will vary and be subject to change as a project progresses. Gas customers are not impacted in planned maintenance projects in the same way they are in electricity. | |

| | | | |
|-------------|-----|---|------------|
| | | <p>The current approach for information exchange between distributors and retailers is appropriate and should not be disrupted with a new protocol.</p> <p>If the GIC determines to proceed with GIEP5A then this should be voluntary, and a protocol applying only at a suitable threshold number of ICPs, such as 100 ICPs.</p> | |
| Bluecurrent | Yes | No comment | No comment |

Related comments

Implementation, amendments and other concerns

| Participant | Comments | GIC response |
|-------------|---|---------------------------------|
| Contact | The format would be best to align with electricity 100% (or as close as possible) to reduce any implementation effort, assuming parties' electricity outage management systems will also be used to process gas outage information. | Acknowledged |
| Genesis | Include notified (upcoming and in progress) interruptions on GREG. | Acknowledged |
| Mercury | <p>'Cost v benefit' in terms of what it will cost us to build the system requirements, versus the potential benefit</p> <p>Main concern was just ensuring that we have enough lead time once a decision is made so that we have time to implement.</p> | Acknowledged |
| Powerco | No comment | No comment |
| Bluecurrent | <p>We believe the description of the gas data flow in the table on page 6 of the consultation paper (under section 3.1 Proposed protocols – Overview) needs to be corrected. The flow of gas data for GIEP5A should be from distributor -> retailer, not retailer -> distributor.</p> <p>Gas distributors and retailers are best placed to determine the cost of any system changes to implement GIEPA.</p> | Agreed, we have corrected this. |

3.1.4 GIEP5B – Unplanned service interruption

Proposal

Extend *Electricity Information Exchange Protocol (EIEP5B) - Unplanned service interruptions* to gas with modifications.

Data flow: Distributor → Retailer

Does industry support this proposal?

| Participant | Support | Comments | GIC response |
|-------------|---------|---|--|
| Contact | Neutral | Maybe – voluntary use feels like the right starting approach. Like everything else, the protocol might be useful if there is a robust need or reasonable volume of customers that would benefit from the notifications, however this would need to stack up to justify the implementation effort and costs. | Value proposition to discuss further. |
| Genesis | No | Probably wouldn't use. For electricity is less accurate at low voltage level. May only be useful at a gas gate level (i.e. major outage). Does frequency of major outages justify format and system updates? | Acknowledged |
| Mercury | Yes | Generally supportive of all proposals | Acknowledged |
| Powerco | Yes | Compared to planned service interruptions (GIEP5A) we see some benefit in more standardised reporting of unplanned service interruptions, noting the majority of unplanned outages relate to a single ICP. The proposed GIEP5B is similar to Powerco's current network fault and emergency plans where retailers are notified when unplanned supply outage impacts a large commercial or industrial customer, and/or a significant length of outage duration for an ICP or significant number of ICPs affected duration. | Value proposition to discuss further. It appears Powerco already have processes in place for unplanned supply outages. Need to test this further with other distributors to determine value proposition of a protocol to formalise this process. |
| Bluecurrent | Yes | No comment | No comment |

Related comments

Implementation, amendments and other concerns

| Participant | Comments | GIC response |
|-------------|--|---------------------------------|
| Contact | Starting position looks ok - we would need to review this more thoroughly. | Acknowledged |
| Genesis | No comment | No comment |
| Mercury | 'Cost v benefit' in terms of what it will cost us to build the system requirements, versus the potential benefit Main concern was just ensuring that we have enough lead time once a decision is made so that we have time to implement. | Acknowledged |
| Powerco | The proposed data fields and the threshold for when the protocol could be used would need adjusting to reflect this approach <i>[approach covered in above table]</i> in gas compared to electricity. | Acknowledged |
| Bluecurrent | As above, we believe the description of the gas data flow in the table on page 6 of the consultation paper (under section 3.1 Proposed protocols – Overview) needs to be corrected. The gas data flow for GIEP5B should be from distributor -> retailer, not retailer -> distributor. Gas distributors and retailers are best placed to determine the cost of any system changes to implement GIEP5B. | Agreed, we have corrected this. |

3.1.5 GIEP12 – Delivery price change notification

Proposal

Extend *Electricity Information Exchange Protocol (EIEP12)* – Price change notifications to gas with modifications.

Data flow: Distributor → Retailer

Does industry support this proposal?

| Participant | Support | Comments | GIC response |
|-------------|---------|---|--------------|
| Contact | Yes | We agree with consultation paper – consistency and standardisation would create operational efficiency and reduce administrative costs. | Acknowledged |
| Genesis | Yes | We see value in this. Gas pipeline businesses change prices same as EDBs (annually). | Acknowledged |
| Mercury | Yes | Generally supportive of all proposals | Acknowledged |
| Powerco | Yes | We acknowledge there could be benefit to retailers in more standardisation of the data received on price changes, across distributors, and across both electricity and gas. The proposed GIEP12 is similar to Powerco's current approach to notifying retailers of gas price changes for standardised pricing. | Acknowledged |
| Bluecurrent | Yes | No comment | No comment |

Related comments

Implementation, amendments and other concerns

| Participant | Comments | GIC response |
|-------------|---|--------------|
| Contact | Align with the electricity equivalent as much as possible. | Acknowledged |
| Genesis | Helpful if all gas pipeline businesses use the same unit of measure for consumption. For example, two are using kWh and two are using GJ. | Acknowledged |
| Mercury | ‘Cost v benefit’ in terms of what it will cost us to build the system requirements, versus the potential benefit Main concern was just ensuring that we have enough lead time once a decision is made so that we have time to implement. | Acknowledged |
| Powerco | Powerco has approximately 200 individually priced sites for gas which can be subject to change at different times. These are notified to individual retailers only. Under EIEP12 we do not include individually priced electricity sites in the EIEP12 file. Should a GIEP12 be established, it should exclude individually priced sites. | Acknowledged |
| Bluecurrent | Gas distributors and retailers are best placed to determine the cost of any system changes to implement GIEP12. | Acknowledged |

3.1.6 GIEP13A – Detailed consumption information

Proposal

Extend *Electricity Information Exchange Protocol (EIEP13A) – Detailed consumption information* to gas with modifications.

Data flow: Retailer → Consumer (or their agent)

Does industry support this proposal?

| Participant | Support | Comments | GIC response |
|-------------|---------|--|---|
| Contact | Yes | Support only if voluntary. We consider the voluntary protocol option to be sensible at this point in time. We still consider the customer requirement and volume of requests to be low. | More discussion needed in working group to determine the right level or frequency to cater for gas compared with electricity which has more detail. |
| Genesis | Yes | May be more useful in future as gas advanced metering infrastructure (AMI) is completed and retailer data systems upgraded. The 13A is to the lowest granularity held/used by the Retailer. May assist customers in reviewing their actual maximum hourly quantity (MHQ), and appropriateness of current metering and gas pipeline business price category. Is there significant value to mandate if Retailer already provides this information via website/app? Very limited requests for data in this format to date. | |
| Mercury | Yes | Generally supportive of all proposals | |
| Powerco | Yes | These protocols may provide some benefit to consumers in standardising the form of request for consumption data, and the form of the retailer response. We note that in electricity the peak vs off peak pricing incentives are a key driver, and this does not exist in gas. There is therefore not the same incentive for a standardised data exchange protocol. | |
| Bluecurrent | Yes | No comment | No comment |

Related comments

Implementation, amendments and other concerns

| Participant | Comments | GIC response |
|-------------|--|---|
| Contact | No comment | No comment |
| Genesis | No comment | No comment |
| Mercury | <p>'Cost v benefit' in terms of what it will cost us to build the system requirements, versus the potential benefit</p> <p>Main concern was just ensuring that we have enough lead time once a decision is made so that we have time to implement.</p> | Acknowledged |
| Powerco | No comment | No comment |
| Bluecurrent | <p>As an advanced gas metering service provider, Bluecurrent may be required to support our customers (retailers) in the implementation of GIEP13A.</p> <p>We will need to assess the cost of any system changes as required by our individual customers to implement GIEP13A.</p> | Something to discuss during workshopping. |

3.1.7 GIEP13B – Summary consumption information

Proposal

Extend EIEP13B – Summary consumption information to gas with modifications.

Data flow: Retailer → Consumer (or their agent)

Does industry support this proposal?

| Participant | Support | Comments | GIC response |
|-------------|---------|---|--|
| Contact | Yes | Support only if voluntary Same as EIEP13a – customer requirements and volumes are considered low. | Acknowledged |
| Genesis | Yes | We see value in having a GIEP13b, and it may get used more than a 13a. We recently had a customer gas data request from BRANZ for about 50 ICPs. This is being fulfilled using a format based on EIEP13b. | Acknowledged |
| Mercury | Yes | Generally supportive of all proposals | Acknowledged |
| Powerco | Yes | These protocols may provide some benefit to consumers in standardising the form of request for consumption data, and the form of the retailer response. We note that in electricity the peak vs off peak pricing incentives are a key driver, and this does not exist in gas. There is therefore not the same incentive for a standardised data exchange protocol. | Electricity vs Gas incentives to be further discussed during drafting. |
| Bluecurrent | Yes | No comment | GIC comment |

Related comments

Implementation, amendments and other concerns

| Participant | Comments | GIC response |
|-------------|--|--|
| Contact | No comment | No comment |
| Genesis | No comment | No comment |
| Mercury | 'Cost v benefit' in terms of what it will cost us to build the system requirements, versus the potential benefit Main concern was just ensuring that we have enough lead time once a decision is made so that we have time to implement. | Acknowledged |
| Powerco | No comment | No comment |
| Bluecurrent | As an advanced gas metering service provider, Bluecurrent may be required to support our customers (retailers) in the implementation of GIEP13B. We will need to assess the cost of any system changes as required by our individual customers to implement GIEP13B. | Discussion required. GIC to determine if there is value in this protocol, then have further discussion with Bluecurrent to determine potential further system change costs required from a metering perspective. |

3.1.8 GIEP13C – Electronic request format for GIEP 13A or 13B

Proposal

Extend EIEP13C - Electronic request format for EIEP13A or 13B to gas with modifications.

Data flow: Consumer (or their agent) → Retailer

Does industry support this proposal?

| Participant | Support | Comments | GIC response |
|-------------|---------|---|---|
| Contact | Yes | Support only if voluntary Same as EIEP13a/b – customer requirements and volumes are considered low. | GIC to determine value in 13a and 13b first. |
| Genesis | Yes | Agree. Consumer# must be mandatory not conditional. | Acknowledged |
| Mercury | Yes | Generally supportive of all proposals | Acknowledged |
| Powerco | Yes | These protocols may provide some benefit to consumers in standardising the form of request for consumption data, and the form of the retailer response. We note that in electricity the peak vs off peak pricing incentives are a key driver, and this does not exist in gas. There is therefore not the same incentive for a standardised data exchange protocol. | Need to determine value proposition of 13a and 13b first. |
| Bluecurrent | Yes | No comment | No comment |

Related comments

Implementation, amendments and other concerns

| Participant | Comments | GIC response |
|-------------|---|--|
| Contact | No comment | No comment |
| Genesis | No comment | No comment |
| Mercury | 'Cost v benefit' in terms of what it will cost us to build the system requirements, versus the potential benefit Main concern was just ensuring that we have enough lead time once a decision is made so that we have time to implement. | Acknowledged |
| Powerco | No comment | No comment |
| Bluecurrent | As an advanced gas metering service provider, Bluecurrent may be required to support our customers (retailers) in the implementation of GIEP13C. We will need to assess the cost of any changes as required by our individual customers to implement GIEP13C. | Discussion required. GIC to determine if there is value in this protocol, then have further discussion with Bluecurrent to determine potential further system change costs required from a metering perspective. |

3.1.9 Procedures for requests for consumer consumption information

Proposal

In electricity, this document sets out procedures that apply to retailers when they respond to requests for consumer information about their own consumption of electricity. This document also contains information to assist consumers, and their agents make requests for this consumption information.

In gas, this document would set out procedures that apply to retailers when they respond to requests for consumer information about their own consumption of gas. This document would also contain information to assist consumers, and their agents make requests for this consumption information.

Key topics in electricity equivalent procedure document

1. Introduction
2. What information must retailers provide?
3. What if a consumer switches retailers?
4. When must a retailer provide consumption information to a consumer?
5. How can a consumer request its consumption information?
6. Can a retailer charge a fee for providing consumption information?
7. When must a retailer advise its consumers of the availability of consumption information?
8. What must retailer's do to keep information secure?
9. What if the request comes from a consumer's agent?
10. What are the timeframes for responding to a request?
11. What format and transfer method must the retailer use to provide information?
 - a. EIEP13A: Detailed electricity consumption information for consumers (non-half hour, half hour or sub half hour)
 - b. EIEP13B: Summary consumption information
 - c. EIEP13C: Electronic request format for EIEP13A or EIEP13B
12. Example timeline showing typical events in sequence

Does industry support this proposal?

| Participant | Support | Comments | GIC response |
|-------------|---------|---|--------------|
| Contact | n/a | No comment | No comment |
| Genesis | n/a | No comment | No comment |
| Mercury | Yes | Generally supportive of all proposals | Acknowledged |
| Powerco | n/a | No comment | No comment |
| Bluecurrent | Yes | We generally support the key topics that are proposed to be included in the document that will set out the procedures that apply to retailers when they respond to requests for information about a consumer's own gas consumption. | Acknowledged |

Related comments

Implementation, amendments and other concerns

| Participant | Comments | GIC response |
|-------------|--|--------------|
| Contact | No comment | No comment |
| Genesis | No comment | No comment |
| Mercury | 'Cost v benefit' in terms of what it will cost us to build the system requirements, versus the potential benefit Main concern was just ensuring that we have enough lead time once a decision is made so that we have time to implement. | Acknowledged |
| Powerco | No comment | No comment |
| Bluecurrent | We agree with the proposed key topics which include, among others: 1. the information that retailers must provide; 2. how a consumer can request his/her consumption information; 3. how a consumer's agent can request consumption information; 4. the fee a retailer can charge; 5. timeframes for responding to the request; 6. what retailers must do to keep the information secure; 7. data format and transfer method; and 8. other information that would assist consumers and their agents make requests for consumption information. | Acknowledged |

3.2 Current protocols

Proposal

Amend existing protocols if there is widespread agreement among participants. Gas protocols that are already in place and used by industry will otherwise remain in place to avoid unnecessary cost burden to those who have already designed their systems and processes around these.

Which voluntary protocols do you use and how can these be improved?

| Participant | Protocols | Comments | GIC response |
|-------------|-----------------|--|---|
| Contact | No comment | No comment | No comment |
| Genesis | GIEP1 and GIEP2 | Consumption units provided in 3 units of measure, but rate in file does not identify the units of measure. There are two gas pipeline businesses which use kWh and two gas pipeline businesses which use GJ. Mandate a single unit of measure or include a field for the unit of measure. | We will consider these amendments during drafting. |
| | GIEP7 | Necessary to keep? Gas pipeline businesses can refer Registry and Reg notification (NOT) files. | Value proposition needs consideration |
| | GIEP8 | Can a rationale/reason field be added? This helps gas pipeline businesses understand reason for request. E.g. “site converted from residential to business”, or “Residential standard user now a low user”, or “meter downgraded”. | We can consider this during drafting. |
| Mercury | No comment | No comment | No comment |
| Powerco | No comment | No comment | No comment |
| Bluecurrent | General comment | We consider the following to be limitations of the current GIEP transfer process: 1. Users cannot view or confirm uploaded files after submission. We can see when the files have been uploaded successfully (green message pops out) but we are not able to see the breakdown of all the files that have been uploaded. 2. No notifications are issued when retailers have uploaded files. 3. Uploaded files disappear if not downloaded within a set timeframe. | We can consider these amendments across new and existing protocols. |

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|--|--|--|--|
| | | 4. There is a restriction on how users can name files when uploading them; a consistent naming structure must be followed. This means that when we request contact information, we are unable to name the file according to our preference or use a more meaningful file name. | |
|--|--|--|--|

3.3 Other comments

| Participant | Category | Comments | GIC response |
|-------------|---|---|--------------|
| Contact | Concerns for implementation timing, resource allocation, and workshopping | <p>Sensible lead and implementation timeframes should be applied to any future programs of work in this area given the resources required to deliver these changes.</p> <p>The best mechanism to assess and deliver any outcomes would be via a more comprehensive working group or workshop style approach.</p> | Acknowledged |
| Genesis | No comment | No comment | No comment |
| Mercury | No comment | No comment | No comment |
| Powerco | No feedback on existing protocols | <p>It is appropriate to consider opportunities to improve existing protocols as part of this review process.</p> <p>Powerco does use the gas registry for some data exchange.</p> <p>We do not have any feedback on existing protocols.</p> | Acknowledged |
| Bluecurrent | General support for voluntary arrangement, and use of AGM data. | <p>We particularly support the voluntary nature of the proposed and existing GIEPs.</p> <p>This preserves flexibility for future updates in the context of the gas sector transition. This enables gas market participants to streamline their information exchange processes – ensuring consistency and compatibility with industry agreed standards – while maintaining the ability to innovate so they can deliver new and improved services to consumers.</p> <p>With the introduction of advanced gas meters, we agree that it is appropriate to introduce new protocols that would help unlock and optimise the value of more granular and timely advanced meter data for industry participants and consumers. As an advanced gas metering service provider, we are happy to help shape the initial drafting of the proposed GIEPs.</p> | Acknowledged |

About Gas Industry Co

Gas Industry Co is the gas industry body and co-regulator under the Gas Act. Its role is to:

- develop arrangements, including regulations where appropriate, which improve:
 - the operation of gas markets
 - access to infrastructure and
 - consumer outcomes
- develop these arrangements with the principal objective to ensure that gas is delivered to existing and new customers in a safe, efficient, reliable, fair and environmentally sustainable manner; and
- oversee compliance with, and review such arrangements.

Gas Industry Co is required to have regard to the Government's policy objectives for the gas sector, and to report on the achievement of those objectives and on the state of the New Zealand gas industry.

