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## **Submission on Gas Information Exchange Protocols (GIEPs) – Phase 2**

1. This is Vector Limited's (Vector) submission on the Gas Industry Company's (GIC) Consultation relating to Gas information Exchange Protocols (GIEPs). We acknowledge the GIC's earlier work related to the GIEPs.
2. Vector supports the overall objective of maintaining non-regulated, industry-agreed information exchanges processes for the gas sector. Vector recognises the benefits of improved standardisation and alignment with electricity protocols, while retaining flexibility through voluntary adoption.
3. Overall, we support voluntary adoption of GIEPs provided this does not result in unintended system or compliance costs. Vector does not support outcomes where voluntary protocol changes effectively require distributors to support multiple formats simultaneously.

### **Protocol specific feedback**

4. GIEP 1 – Network detail consumption information - Vector supports the proposed minor amendments in principle. However, Vector is concerned that any changes resulting in dual format acceptance would impose material system and implementation costs. Vector therefore seeks confirmation that the proposed changes will be fully backward-compatible (i.e. changes should work with existing systems exactly as they are, without the need for upgrades or parallel processes). The risk is highest for billing critical consumption data (GIEP1), where even minor format differences would require Vector to create dual ingestion, validation and reconciliation protocols.
5. GIEP 2 – Network summary consumption information - Vector supports the changes, subject to the same backward-compatibility principle applying to avoid the need for parallel processing.
6. GIEP 8 – Network price category and tariff change – Vector supports standardised tariff change notifications and existing security provisions.

7. GIEP 4 – Customer information – Vector supports the use of GIEP 4 as an optional protocol for use where agreed. Vector supports the emphasis on privacy, confidentiality and secure data transfer.
8. GIEP 5B – Unplanned service interruptions – Vector supports GIEP 5B as an available standard format, with secure transfer and Privacy Act obligations.
9. GIEP 12 – Delivery price change notification – Vector supports standardisation and alignment with published delivery price schedules.
10. GIEP13B/GIEP 13C - Consumer consumption information and request formats. Vector is supportive. We support clear, auditable processes for consumer and agent requests, including identify verification and response timeframes.
11. Overall, we recommend GIC:
  - a. ensure amendments to existing GIEPs do not necessitate parallel or dual-format support
  - b. provide clear and concise change logs and implementation guidance for each amended protocol
  - c. explicitly state whether proposed changes are additive and backward compatible, or whether they will require system and process changes by participants and how or why this is beneficial
  - d. maintain robust and consistent privacy and security requirements across all protocols relating to customer and consumption data.

Yours Sincerely

For and On Behalf of Vector Limited,



Monica Choy  
Senior Regulatory and Pricing Partner