Gas Industry Company – GIEP Consultation

Contact Response – June 2025

Introduction

Contact is supportive of considering changes or introducing new exchanges to the Gas Industry Protocols where it makes practical sense, provides benefits to industry participants or customers and doesn't introduce unnecessary complexity or cost.

There is currently a significant number of regulatory programs and initiatives underway across the Electricity sector, which is consuming critical resource, so any changes would need to be carefully considered and prioritised accordingly. 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 would likely be the same as Electricity and have competing priorities.

We also note that we have given this a reasonably light review and response and consider the best mechanism to assess and deliver any outcomes would be via a more comprehensive working group or workshop style approach.

Consultation questions:

EIEP4 – Customer information protocol

Question	Response
Do you support the introduction of a gas equivalent EIEP4 protocol? (Yes/No)	Yes
Why do you support/not support?	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. 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.
Are there any fields from EIEP4 that should be excluded? Please be specific.	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).
Further comments?	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.

	We also consider there is the opportunity to include additional useful information within this protocol, along with the potential for having a retailer to MEP channel also. I.e. Additional hazard information would be useful (Dog, site hazards etc.) to improve contractor H&S outcomes.

EIEP4a – MDC customer information protocol

Question	Response
Do you support the introduction of a gas equivalent EIEP4a protocol? (Yes/No)	No
Why do you support/not support?	A few reasons. 1. The costs outweigh the benefits. 2. 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. 3. 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). 4. Provision of the MDC indicator alone is pointless without the supporting customer information (what would a distributor do with the MDC indicator alone). Our preference is to incorporate any additional/supplementary information into the existing EIEP4 protocol.
Are there any fields from EIEP4a that should be excluded? Please be specific.	We don't consider EIEP4a is useful and having a second protocol creates unnecessary costs and complexity for no benefit.
Further comments?	Recommend discussing further with key industry parties before finalising requirements and implementing anything.

EIEP5a – Planned outage information protocol

Question	Response
Do you support the introduction of a gas equivalent EIEP5a protocol? (Yes/No)	Maybe – voluntary use feels like the right starting approach.
Why do you support/not support?	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.
Are there any fields from EIEP5a that should be excluded? Please be specific.	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.

Further comments?	None

EIEP5b – Unplanned outage information protocol

Question	Response
Do you support the introduction of a gas equivalent EIEP5b protocol? (Yes/No)	Maybe – voluntary use feels like the right starting approach.
Why do you support/not support?	Similar to the above EIEP5a feedback.
Are there any fields from EIEP5b that should be excluded? Please be specific.	Starting position looks ok - we would need to review this more thoroughly.
Further comments?	None

EIEP12 – Price change notifications

Question	Response
Do you support the introduction of a gas equivalent EIEP12 protocol? (Yes/No)	Yes
Why do you support/not support?	We agree – consistency and standardisation would create operational efficiency a reduce administrative costs.
Are there any fields from EIEP12 that should be excluded? Please be specific.	Align with the electricity equivalent as much as possible.
Further comments?	None

EIEP13a – Detailed consumption information

Question	Response
Do you support the introduction of a gas equivalent EIEP13a protocol? (Yes/No)	Yes – if voluntary
Why do you support/not support?	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.
Are there any fields from EIEP13a that should be excluded? Please be specific.	No
Further comments?	None

EIEP13b – Summary consumption information

Question	Response
Do you support the introduction of a gas equivalent EIEP13b protocol? (Yes/No)	Yes – if voluntary
Why do you support/not support?	Same as EIEP13a – customer requirements and volumes are considered low.
Are there any fields from EIEP13b that should be excluded? Please be specific.	No
Further comments?	None

EIEP13c – Request format for EIEP13a/b

Question	Response
Do you support the introduction of a gas equivalent EIEP13b protocol? (Yes/No)	Yes – if voluntary
Why do you support/not support?	Same as EIEP13a/b – customer requirements and volumes are considered low.

Are there any fields from EIEP13b that should be excluded? Please be specific.	No
Further comments?	None