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Gas Industry Co
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Via email: consultations@gasindustry.co.nz

Tēnā koe,

Alignment with EIEP will add value in some cases

As one of Aotearoa's largest gas and electricity distributors, Powerco has an interest in effective and efficient data exchange between energy system operators. We are familiar with the electricity information exchange protocols (EIEP) and have some concerns about the appropriateness of applying these to gas processes through the gas information exchange protocols (GIEP). We provide the following overview comments and attach further comments on the individual proposed GIEP:

Alignment with EIEP could assist with consistent approaches

- In principle, alignment of GIEP with the existing EIEP is appropriate to optimize systems implementation and facilitate consistency in customer information exchange.
- All GIEP are proposed to be voluntary, even those that are mandatory for electricity. In our experience, voluntary protocols are likely to attract more limited uptake, however we consider there is not a valid case to make these gas protocols mandatory.

The gas context is not the same as electricity

- There are very different drivers and needs for gas vs electricity, so a like for like replication is generally not warranted.
- We caution against the wholesale adoption into GIEP to avoid inappropriate application, limited customer benefit and/or unjustified process cost.

This submission does not contain any confidential information and may be published in full. If you have any questions regarding this submission or would like to talk further on the points we have raised, please contact Irene Clarke (Irene.Clarke@powerco.co.nz).

Nāku noa, nā,

Emma Wilson
Head of Policy, Regulation and Markets
POWERCO

Proposed GIEP – Powerco responses

Table 1 Powerco responses

Topic	Powerco response
GIEP4	We support introduction of a gas equivalent to EIEP4 as this is key baseline customer information. Consistency between electricity and gas would be beneficial.
GIEP4A	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 ie we are not aware of any gas specific service or appliance that would be associated with this classification. Checking relevance is important as distributors holding this sensitive information require specific systems to manage privacy. 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, however it is our view that EIEP4A is not relevant in a gas context in any case.
GIEP5A	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. The current approach for information exchange between distributors and retailers is appropriate and should not be disrupted with a new protocol. 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.
GIEP5B	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. The proposed data fields and the threshold for when the protocol could be used would need adjusting to reflect this approach in gas compared to electricity.
GIEP12	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. 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.
GIEP13A **GIEP13B** **GIEP13C**	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.
Existing GIEPs	It is appropriate to consider opportunities to improve existing protocols as part of this review process. Powerco does use the gas registry for some data exchange. We do not have any feedback on existing protocols.