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Electricity Commission
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By email: submissions@electricitycommission.govt.nz

SUBMISSION ON USE OF DISTRIBUTOR PRICING CATEGORY CODES IN THE REGISTRY

- 1 Orion welcomes the opportunity to submit on the *use of distribution pricing category codes in the registry consultation paper* (the **consultation paper**) and the associated *use of distribution pricing category codes in the registry- information guide* (the **guide**).
- 2 Our submission is in three parts:
 - 2.1 general comments on the consultation paper;
 - 2.2 our response to the specific questions raised in the consultation paper, which we set out in schedule 1 to this letter; and
 - 2.3 our comments on the individual clauses of the guide which are set out in schedule 2 to this letter.

General comments

- 3 Orion has observed a significant variation in the way distribution pricing fields on the Registry are used. We agree that an information guide will provide the basis for a more consistent approach, enhancing the reliability and usefulness of the information.
- 4 The guide must recognise that these fields are used to convey information on distribution pricing, and in many cases this is not aligned with retail pricing for consumers. Paragraph 2.1.1 of the consultation paper suggests that “Distributors set price schedules for consumers...”, this is not the case. Distributors set delivery prices (otherwise referred to as line prices) that apply for connections or groups of connections.
- 5 In New Zealand, electricity delivery for most connections is provided on an interposed basis, where the retailer contracts with the distributor to provide delivery, and the distributor applies a set of ICP and/or GXP based prices. There is no obligation under law or regulation, that we are aware of, that requires a retailer to use the distributor’s pricing structures when designing retail price offerings. The retail market

- is based on competition between suppliers and price offerings form a fundamental part of any competitive market.
- 6 Distributors have been excluded from the retail market under legislation and the structure of their pricing is, in some cases, used by retailers for their pricing – the choice is the retailers.
 - 7 Distribution charges are just one cost input into retail prices and retailers could choose to reflect other cost drivers.
 - 8 We consider that the role of the Registry pricing fields is to convey information on delivery pricing to retailers and prospective retailers to enable them to formulate and apply a competitive retail offering.
 - 9 We are concerned that the “guide” has gone well beyond this role. We consider that, inappropriately, the guide:
 - 9.1 attempts to require retailers to apply the distributor’s pricing in its retail offerings,
 - 9.2 specifies retailer obligations in relation to distributor pricing categories,
 - 9.3 specifies obligations in relation to other, non-pricing Registry fields, and
 - 9.4 details the use of industry standard files.
 - 10 As noted in our response to individual clauses in schedule 2 (attached), we consider that these sections (9.1 to 9.4) should be deleted.
 - 11 We were involved in the initial development of these registry fields and we support the original view that the pricing fields are intended to convey pricing information 99% of the time, but accept that there are a small number of complex cases (usually larger connections) where the fields are not sufficient to convey the necessary information. We have drafted an alternative to clause 18 which provides for these situations.
 - 12 Distributors operate in different commercial, economic and physical environments and have developed and innovated a range of pricing approaches in response to these differences. It is important that any desire to standardise the use of pricing codes should not be interpreted as a desire to standardise or dilute cost reflective pricing structures or commercial arrangements.

Concluding remarks

- 13 Thank you for the opportunity to make this submission. Orion does not consider that any part of this submission is confidential. If you have any questions arising from this submission, please contact Dennis Jones (Industry Developments Manager), DDI 03 363 9526, email dennis.jones@oriongroup.co.nz.

Yours sincerely



Dennis Jones
Industry Developments Manager

SCHEDULE 1

Answers to the Commissions specific questions

Question ID	Question	Comment
a.	Do you agree with the concept that the distributor price category code is a single code that represents a group of tariffs applicable to an ICP?	Yes, we agree with the concept that the distributor categories code is a single code that represents a group of price components applicable to an ICP, but only to the extent that it represents the distributor's delivery pricing and does not determine retail consumer pricing. For the avoidance of doubt we note that each price category has a code and a description, and a number of price components and price options. The distributor's published "price schedule" provides a schedule of all price categories together with the relevant price components and price options.
b.	Do you have another interpretation of the definition price category code that you would like to discuss? Please provide details of the option, benefits, etc.	We do not suggest any alternative definition for price category codes.
c.	Does the document provide sufficient detail to standardise the application of the distributor price category code. Please give reasons for your answer and suggestions for improvements.	No, not as drafted, however with the changes we have noted in schedule 2 (attached), we consider that the guide will provide sufficient detail to standardise the use of these pricing category codes. Again we emphasise that standardising the use of pricing codes should not be interpreted as a means to standardise or dilute distributors cost reflective pricing structures or commercial arrangements.
d.	Does the document cover all relevant details relating to the application of the distributor price category?	We consider that the document covers too much, and addresses areas that are not directly relevant to pricing category fields and are outside the Rules. We consider that a number of sections should be deleted, as noted in schedule 2 (attached).
e.	Is the information provided within the switching files of sufficient detail to allocate distributor tariffs to an ICP? Please give reasons for your answer and suggestions for improvements.	The information in the switching files is not relevant to this guide on how distributor price category codes should be used.
f.	Should the guideline be extended to cover the other registry requirements that have an impact on the allocation of tariff options?	No, the guideline should not be extended to cover other registry requirements.

SCHEDULE 2

Clause by clause comments on the Information guide

Clause	Detail of clause	Comment	Recommendation
1	Retailers should determine distributor pricing for each ICP, and distributors are required under part E of the rules to provide a distributor price category code on the registry that is used to unambiguously define line charges for each ICP	The clause is poorly drafted. Retailers do not determine distributor pricing.	Replace clause with "Distributors determine the delivery pricing that applies for each ICP and, under part E of the rules, must provide a price category code on the registry that can be used to unambiguously define the set of delivery prices that apply for each ICP.
2	Distributors have historically determined their pricing by load group which, by default, has in some cases become the price category as used on the registry. Typical price categories include: (a) street lighting; (b) unmetered load; (c) domestic under 10kVA capacity; (d) commercial; and (e) capacity related tariffs.	This is a generalised comment and adds no value to the information guide, even as a reference to a historic regime. Distributors will be faced with the need to continually innovate their price structures to react to the changing environment.	Replace clause with a reference to distributors needing to continually review and innovate their price structures to meet the needs of customers in a changing environment.
3	Each distributor should determine their own price categories and the price category into which each ICP falls, and must publish the price category code for each ICP on the registry.	We agree with this clause but it duplicates the message in our revision for clause 1.	Delete this clause.
4	Distributors should also publish their price category codes within their pricing schedule or similar document made available to retailers for the purpose of identifying applicable distributor line charges.	We agree with this clause.	This clause should be retained.

Clause	Detail of clause	Comment	Recommendation
5	Many distributor pricing schedules have optional tariff components that are based on the metering and load management devices that form the metering installation.	As we understand this, the point is that there are often options within pricing categories, and the pricing category codes do not attempt to define which options are applicable.	Replace clause with "The set of prices applicable to each pricing category code may include optional price components that depend on the metering or load management arrangements, and/or options selected by the consumer or retailer.
6	The consumer contracts load management rights to the distributor and retailer by accepting tariff options.	This is a contractual issue and is not relevant to the use of pricing category codes on the registry and outside the scope and objective of this information guide.	This clause should be deleted.
7	The retailer should engage with the consumer to choose the best combination of distributor and retailer pricing options for the consumer's needs. Examples of typical tariff options that may be available within a distributor price category include: (a) fixed charge; (b) controlled load; (c) night rate only; and (d) day/night.	In most cases, retailers are free to create any retail price offering they choose, and in many cases it is not possible to directly reflect the distributor's price components in retail pricing plans. This requirement goes beyond the purpose of this guide.	This clause should be deleted.
8	There are a number of distributor related fields on the registry that relate to the application of tariff option for an ICP. Retailers rely on these fields being appropriately maintained in order to allocate tariffs to meter registers and consumers in their electricity sales process.	Retailers are not obliged to rely on the information in the registry fields and may also elect to structure retail pricing plans differently.	Reword this clause to read "Retailers need to be able to rely on the information in the pricing fields and other distributor related fields on the registry to determine the basis for delivery costs for an ICP. Retailers may use this information to set and maintain appropriately structured retail pricing arrangements for their customers."

Clause	Detail of clause	Comment	Recommendation
9	<p>The rules concerning the publishing of distributor price related information on the registry are found in schedule E1 of part E of the rules. Each of these rules has a corresponding field on the registry:</p> <p>(a) rule 2.4: Installation type; (b) rule 2.8: Distributor price category; (c) rule 2.9: Chargeable capacity; and (d) rule 2.10: Distributor installation details.</p>	<p>Rule 2.9 and 2.10 are optional fields.</p>	<p>Indicate that the chargeable capacity and distributor installation details are optional.</p>
10	<p>Other rules within schedule E1 of part E of the rules require related information that have an impact on retailer pricing that the distributor should update on the registry:</p> <p>(a) rule 2.7: Dedicated NSP status; (b) rule 2.11: Unmetered load details; (c) rule 2.12: Shared unmetered load details; (d) rule 2.12: Shared unmetered load ICP list ; and (e) rule 2.5: Distributor loss category code.</p>	<p>We agree with this clause.</p>	<p>This clause should be retained, change “retailer pricing” to “retail pricing arrangements” for consistence with our suggested clause 8 above.</p>
11	<p>These registry fields can only be altered by the distributor. Where a retailer determines an inaccuracy, the retailer should discuss the allocation of the price category code with the distributor directly.</p>	<p>The inaccuracy may affect more than just the pricing category code. We suggest that this clause should be broadened.</p>	<p>Replace this clause with “These registry fields identified in clauses [9] and [10] can only be altered by the distributor. Where a retailer determines an inaccuracy, the retailer should refer this to the distributor to resolve”.</p>

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12	<p>Related guidelines published by the Commission are available on the Commission's website (http://www.electricitycommission.govt.nz/infopapers/index.html#retail):</p> <p>(a) Maintenance of registry unmetred load fields are described in the unmetred load guideline; and</p> <p>(b) requirements for creating and maintaining distributor loss factors are described in the distribution network losses guideline.</p>	<p>We agree with this clause, however, the losses guideline has not yet been finalised.</p>	<p>This clause should be retained.</p>
12A	<p>Suggested additional clause.</p>	<p>There is often confusion between pricing terms and we believe it is useful to define and consistently use appropriate terms. Particularly, we consider the term "tariff" implies a tax or trade levy, and we would prefer to see the word "price" used instead. We also observe some confusion between the terms "price" and "charge".</p>	<p>We recommend the insertion of the following:</p> <p>'Price' is a rate of charging, expressed in dollars and/or cents per chargeable unit of quantity.</p> <p>'charge' is the calculated cost (price x quantity), expressed in dollars.</p>
13	<p>Price category is defined in part A of the rules as: means the relevant code in the schedule published by any distributor that is used to unambiguously define the line charges at the relevant ICP.</p>	<p>We agree with this clause.</p>	<p>This clause should be retained.</p>
14	<p>Price category codes are used in conjunction with the distributors published pricing schedule and knowledge of the metering and load management configuration that comprises the metering installation at each ICP and are required to unambiguously define the distributor charges at each ICP.</p>	<p>This clause does not reflect any appropriate terminology and is incorrect. There is no requirement or need for a price category codes to be used in this way. Nor will a distributors pricing necessarily be compatible with the metering at an ICP.</p>	<p>Delete this clause.</p>
15	<p>"Tariff option" means the price option within a price category where such a price category provides for consumer or retailer choice amongst two or more options, subject to a particular configuration of metering and load control equipment.</p>	<p>This may be one usage of this term, but we are unclear as to its relevance in this guide. As noted above, we would prefer to see the term "price", or "pricing plan" used, with the definitions we have suggested as a new clause 12A.</p>	<p>Delete this clause.</p>

Clause	Detail of clause	Comment	Recommendation
16	<p>“Price schedule” means a schedule of prices for tariff options for each price category code. An example of a pricing schedule showing price category, price category code, and tariff options is shown below. The price schedule is published in the distributors pricing disclosure or equivalent document made available to all retailers.</p>	<p>We consider that this clause and the terminology used can be simplified significantly.</p>	<p>Following on from clause 13 above, this clause should read: “Each price category has a code and a description, and a number of price components and price options. The distributor’s published “price schedule” provides a schedule of all price categories together with the relevant price components and price options.”</p>
17	<p>Distributors have obligations within the rules. Some of these obligations relate to the management of pricing related fields in the registry.</p>	<p>We agree that this clause is factual.</p>	
18	<p>Distributors:</p> <p>(a) create and maintain ICPs in the registry. The distributor manages issues relevant to the connection and also determines distributor pricing applicable for that point of connection (in this instance the ICP) to their network.</p> <p>(b) may have specific requirements for consumer connections, such as load management and metering, that is either conveyed to the consumer at the time the connection is being approved, or by the retailer in offering price options. The distributors pre-requisite for a component within a tariff may be an appropriate meter register or load management device.</p> <p>(c) should establish price category codes, and tariff option codes for all possible tariff options within their pricing plans. The distributor should publish price category and tariff option codes in its pricing disclosure or related document that is available to retailers. This information should be clearly stated as it will be used along with the price category code published on the registry to unambiguously define the line charges for each ICP.</p>	<p>We do not agree with this clause, much of it is not related to the use of pricing category codes and part (c) goes beyond the requirements in the rules (there is no obligation to determine codes for the price components within pricing categories).</p> <p>We suggest an alternative and simplified operative section to this guide.</p>	<p>Replace this clause with “The distributor will:</p> <ol style="list-style-type: none"> a. Determine pricing categories as defined in the rules and make this information available to retailers including pricing category codes, associated price components and price options, and sufficient detail for the retail to determine how prices are applied. b. Populate and maintain the pricing category code and, where relevant, the optional pricing fields noted in clause 9 for each of its ICPs on the registry. c. The distributor may temporarily use the code “POA” (or similar) where the pricing category has not yet been determined for a new connection, but the Commission considers that this should be updated within 2 weeks. d. The distributor may permanently use the code “POA” (or similar) where it has a small number of connections with pricing that is too complex to adequately describe using the registry fields. The distributor must make arrangements to provide pricing information to retailers and prospective retailers by other means and the Commission considers that this option should not be

Clause	Detail of clause	Comment	Recommendation
			used for more than 1% of the distributors ICPs.
19	<p>The distributor should provide certain information on the registry prior to the ICP being moved to the “ready” state, this includes a distributor price category code. The distributor is expected to know which price category the connection falls into from their new connections process, although it is acknowledged that in some instances this information has to flow from the retailer to the distributor which can take some time.</p> <p>(a) In this situation, the distributor may temporarily post the price category code price on application (POA) meaning the published price category code will be posted on the registry when made available to the distributor. The Commission considers this temporary code should remain posted for no more than two weeks after liveness of an ICP.</p>	See our comments in relation to clause 18 above.	Delete this clause.
20	Retailers have obligations within the rules. Some of these obligations relate to the management of information within the registry, but retailers may also use fields within the registry for purposes that are outside of the rules.	This section does not add anything to the objective of this guide, namely to assist participants and others in interpreting and determining how participants might comply with the rules regarding the provision and use of the various codes on the registry for the identification of distributor line charges associated with each installation control point.	Delete this clause.

Clause	Detail of clause	Comment	Recommendation
21	<p>One of these purposes is the allocation of distributor pricing to consumers for electricity sales invoicing purposes. Retailers manages electricity sales and purchases with the consumer, and, to a large extent, the metering and load management configuration that comprises the metering installation.</p> <p>(a) Where the consumer has an interposed agreement, the retailer will charge the consumer for distribution charges as well as electricity sales based on the metering and load management configuration.</p> <p>(b) Where the consumer has a conveyance agreement, the retailer may charge the consumer for electricity sales only based on the metering and load management configuration. The distributor may charge the consumer for distribution charges only based on the metering and load management configuration.</p>	See our comments in relation to clause 20 above.	Delete this clause.
22	Meter installation information is not detailed within the registry. This information is either noted within the retailers' records, or provided by the metering equipment owner, or in the case of an ICP switching, the TN file transferred between retailers at the time an ICP switches via the switching process.	This clause does not add anything to the objective of this guide and is not relevant to this guide.	Delete the clause.

Clause	Detail of clause	Comment	Recommendation
23	<p>When an ICP is switched between retailers, the gaining retailer:</p> <p>(a) may consider whether or not to offer the consumer a different tariff option that is a component of the distributors price schedule.</p> <p>(b) will provide the distributor with the industry standard information exchange files stating the tariff option codes for the tariff options in use at the connection in accordance with the distributors pricing schedule and the Use of System Agreement.</p>	<p>This clause is erroneous at least for some distributors. It is the distributor that sets the distribution price and the distributor that assigns that price category code to an ICP. The retailer may choose to change the retail price or may request a change to the distribution price that assigned to an ICP but the choice is not necessarily the retailers.</p> <p>In any case, this clause does not add anything to the objective and is not relevant to this guide.</p>	Delete this clause.
24	<p>The retailer may offer other tariff options other than that offered by the distributor that are related to other load management or pricing initiatives. However distributors will expect that the tariff option applied by a retailer will recover the rates required by the distributor price category code.</p>	<p>The distributor will not necessarily be concerned if a retailer fails to recover the rates required by the distributor's price category code and this is a risk that the retailer takes on. The distributor will however expect to recover from the retailer under an interposed agreement the full delivery charges. The retailer may well wish to offer loss leaders to some customers.</p> <p>In any case, this clause does not add anything to the objective and is not relevant to this guide</p>	Delete this clause.
25	<p>At any time the retailer may negotiate retail price options with the consumer and may change the metering and load management devices that comprise the metering installation. The retailer will then advise the distributor by way of industry standard information exchange files which distributor tariff codes are applicable at that ICP in accordance with the Use of System Agreement.</p>	<p>We suggest an alternative and simplified wording for the retailers' obligations.</p>	<p>Following on from our amended clause 18, we suggest: "The retailer will notify the distributor of any information that may affect the distributor's allocation of a pricing category code and/or pricing options. Specific notification may be required under the use of system agreement and, in the absence of an alternative arrangement; industry standard information formats should be used". The retailer should be aware that certain metering or load management requirements of the distributor may not be optional.</p>

Clause	Detail of clause	Comment	Recommendation
26	An example of the ICP management lifecycle process using the possible codes from the table in paragraph 16.	This level of detail is not necessary to achieve the objective.	Delete this clause.
27	An ICP switches from retailer A (losing retailer) to retailer B (gaining retailer) in accordance with the rules ³ . This ICP was determined by the distributor to be eligible for the distributors domestic low fixed charge pricing option. Consequently the connection is given a price category code of DOML in the registry by the distributor. This code tells retailers that the connection is eligible for distributor pricing according to the distributors published code DOML which has a number of tariff options available depending on the metering installation, which comprises metering and load management devices. The distributors disclosed pricing schedule is as below.	This level of detail is not necessary to achieve the objective.	Delete this clause.
28	The retailer determines the metering and load management configuration to comprise an anytime meter and separately metered controlled water heating from the information in the losing retailer's TN file. The retailer updates their own records to record the meters with and without control devices, serial numbers, etc, and determines from the distributors price category code in the registry and the distributor pricing schedule the tariff code that applies to each meter register. Note that these tariff codes are not transferred between retailers within the registry switching files.	This level of detail is not necessary to achieve the objective.	Delete this clause.
29	The retailer sends the following records to the distributor in the EIEP1 consumption file:	This level of detail is not necessary to achieve the objective.	Delete this clause.

Clause	Detail of clause	Comment	Recommendation
30	The distributor notes from the EIEP1 file that this connection has tariff options DL1 and DL2, updates their own billing records accordingly and generates billing information to the retailer as appropriate.	This level of detail is not necessary to achieve the objective.	Delete this clause.
31	Distributors may also choose to maintain their own record of tariff option at each connection independently of the retailer, and may use the information in the EIEP1 file to verify the retailer record against their own records.	This level of detail is not necessary to achieve the objective.	Delete this clause.
32	Distributors are required under part E of the rules to maintain a distributor price category code on the registry that is used to unambiguously define distributor charges for each ICP4. Note that this is a single code as defined in part A of the rules.	Repeat of above.	Delete this clause.
33	The price category code must indicate to the retailer the category (load group) of distributor pricing applicable for an ICP and relate to information provided in the distributors pricing disclosure in order to unambiguously define all the distributor charges for the connection. The tariff option codes applicable at each ICP are not posted on the registry, but are contained in the distributor pricing disclosure.	Too much detail which is already covered above.	Replace with: "The price category code is a 50 alpha-numeric field for each ICP on the registry. It can be set to one of the active entries in the price category codes table on the registry, and is used to unambiguously define the set of delivery prices that apply for each ICP."

Clause	Detail of clause	Comment	Recommendation
34	<p>Examples of price category codes:</p> <p>(a) In the simplest case, a price category code may define the category of standard unmetered load where only a daily fixed charge is applicable. In this instance, the price category code, along with the distributors pricing disclosure, is all that is required to unambiguously define distributor charges for the connection.</p> <p>(b) A more complex example of price category code may be one that defines a connection where a fixed daily charge and standard anytime or day only metered charge are always applicable with various options such as controlled and night rate.</p>	<p>This level of detail is not necessary to achieve the objective.</p>	<p>Delete this clause.</p>
35	<p>The distributor chargeable capacity field is a numeric field with two decimal places intended to convey the value (if applicable) of a single chargeable capacity for an ICP from the distributor to the retailer.</p>	<p>We agree with this clause.</p>	<p>Retain this clause.</p>
36	<p>Where a single chargeable capacity is applicable to an ICP, the distributor is expected to place the value in the registry chargeable capacity field; otherwise the field is to be left blank.</p>	<p>We agree with this clause.</p>	<p>Retain this clause.</p>
37	<p>Where more than one chargeable capacity is applicable at an ICP, the distributor installation details field may be used (as below).</p>	<p>We agree with this clause.</p>	<p>Retain this clause.</p>
38	<p>The distributor installation details field is a 30 alpha numeric character general purpose field for conveying installation details relevant to distributor charging from the distributor to the retailer. This field should only contain information that is directly relevant to and necessary for determining distributor charges at the connection.</p>	<p>We agree with this clause.</p>	<p>Retain this clause.</p>

Clause	Detail of clause	Comment	Recommendation
39	Where distributors intend to place additional tariffing information within this field (such as the chargeable capacity mentioned above), the distributor should inform the retailer that there may be additional tariffing information that may at times form part of the content of this field.	We agree with this clause.	Retain this clause.
40	Retailers should be aware to review this field for additional tariffing information	We agree with this clause.	Retain this clause.
41	Distributors are required to maintain an installation type code on the registry that is used to define if the site generates only (G), consumers only (L), or both generates and consumes (B).	This is not relevant to this guide.	Delete this clause.
42	Similar coding is used within the TN switch file for transferring metering installation configuration between retailers, where the presence of (a) "L" against a meter register indicates that the register records consumption values; and (b) "G" indicates that the register records generation values.	This is not relevant to this guide.	Delete this clause.
43	When assigning tariffs, retailers need to be aware of the flow direction and select the appropriate tariff from the distributors pricing schedule.	This is not relevant to this guide.	Delete this clause.
44	Industry standard files exist for exchanging tariff option code information between retailers and distributors	This is not relevant to this guide.	Delete this clause.

Clause	Detail of clause	Comment	Recommendation
45	EIEP1 is the standard file for transferring detail consumption information by ICP-tariff. This file may be initiated by retailers or distributors, but is most commonly used by retailers to advise distributors of ICP consumption by distributor tariff option code. The EIEP1 file has a field for the distributor supplied tariff option code to be provided against consumption for each meter register.	This is not relevant to this guide.	Delete this clause.
46	EIEP8 is the standard file for advising tariff option changes for an ICP, this file may be initiated by retailers or distributors. When the file type "R" (register detail) is used, the file format contains a field for the distributor tariff option code.	This is not relevant to this guide.	Delete this clause.
47	Detailed protocol and guideline documents for these and other industry standard file types may be found on the Commission's website.	This is not relevant to this guide.	Delete this clause.
48	Distributor's responsibilities include: (a) Determine and publish price schedule that relates the price category code to tariff options. (b) Maintain the registry with the appropriate price category code, connection type, chargeable capacity, and distributor installation details for each ICP. (c) Receive tariff option information from retailers in industry standard files.	We consider that our suggested modifications will simplify this guide to the extent that a summary is not necessary.	Delete this clause.

Clause	Detail of clause	Comment	Recommendation
49	<p>Retailers responsibilities include:</p> <p>(a) Identify for the consumer the applicable distributor tariff options within the price category code on the registry for that ICP.</p> <p>(b) Apply line charges to each ICP as determined by the applicable distributor price category, metering and load management configuration, tariff options, and the distributors pricing schedule.</p> <p>(c) Advise the distributor of the tariff option codes applicable at each ICP using industry standard files.</p>	<p>This clause is not necessarily correct and we consider that our suggested modifications will simplify this guide to the extent that a summary is not necessary.</p>	<p>Delete this clause.</p>