

Submissions - Retail Data Project

Electricity Authority

Wellington 6143

Energy and Technical Services Ltd (ETSL) welcome this opportunity to comment on the Draft Consultation Paper for 'Retail data project: access to consumption data'.

About ETSL

However, before we continue we would like to provide some perspective on our level of experience of accessing retailer consumption data. Our core business is in the provision of energy management information services through our e-Bench® Enterprise Software as a Service platform.

We interact with all of NZ's five main retailers and also some of the smaller, new entrants, where our clients have connections with. Our clients include about 35% of all NZ's local government sector and some large central government organisations such as the NZDF. Overall we are tracking and reporting on about 15,000 ICPs each month, 95% of which are electricity.

ETSL is pleased to see the EA addressing this issue, as we have found the NZ electricity retail market particularly dysfunctional when it comes to the acquisition and updating of electricity consumption data. Retailers changing their billing engines and invoice file formats without any consultation with clients or market intermediaries like ourselves, means we face constant disruption and software development costs in responding to their changes. The prospect of a single format for the exchange of electronic data is therefore very welcome.

Obtaining interval data has been extremely challenging and difficult. In some cases, the frequency of meter readings has also been failing to meet the EGRs and we have also found rounding errors in retailer's invoices that has meant, that when attempting to recreate the invoices based on their line items such as energy only tariffs, EA levy, network fees, etc., the calculation doesn't match invoice totals. Perhaps this is something the EA might want to address, in ensuring that the information displayed on the invoice is the actual figure used in the invoice calculation, rather than an approximation due to rounding.

We note discussions around the four options the EA have. It may be worth noting that EMANZ wrote to all retailers back in 2008, requesting that they might agree on a standardised format for the exchange of electronic invoice information. Needless to say, the reception by retailers to this concept was underwhelming, thereby reinforcing the belief that only a formalised set of rules introduced as part of an amended EA code might see this eventuate.

Our response to the Questions follows on the next page.

Answers to EA Questions

Q#	General Comment	Response
Q1.	Do you have any comments on the description of the current situation, including: a) The link between consumer engagement and retail competition? b) Current levels of consumer engagement? c) Current limits on access to consumption data?	ETSL broadly supports the EA's conclusions in describing the current situation and is something we and our clients have been experiencing. Having the electricity market become more transparent in the way it distributes the follow of invoice and consumption information is almost certain to lead to a more informed consumer and to innovation, by allowing new products and services to enter the market, confident that the information at the base of their offering will be always available in a consistent and timely manner. A more informative consumer is also likely to have higher expectations of their retailer and value on the interval data that they might be able to use in the way they consume electricity. We envisage that the bar for the whole retail sector will be raised and points of differentiation between retailers, will in turn foster greater competition. Therefore the EA initiative to improve the provision of information that contributes to better decision-making by end users on their consumption can, and ETSL believes will, improve transparency and in turn, market competition. At the present, it is extremely difficult to obtain interval data. What there is, is limited to TOU connections. The ability to access the interval data also varies between retailer, with some sending the data through in a file containing 30 minute intervals, others in four-hourly blocks and others requiring the download of the data from a retailers web-site. This latter situation is very time consuming. In some cases and retailers, no interval data is available. Where interval data is available, it is almost always at least one month old, meaning there is no opportunity to react to spikes in consumer demand. Whilst, it is possible to analyse the historical interval data to determine what may be causing spikes in consumption and therefore introduce measures to hopefully deal with these going forward, the opportunity of the moment is always lost. This inability of the consumer to be able to react to real time data leads to consumer disengagement and apathy, due to the feeling there is little they can do to effectively manage demand. The issue is that there are no guidelines, standards or consistency relating to the provision of consumption

		information, or any form or degree of requirement for all parties (retailers, lines companies, meter providers, energy service companies) to co-operate in the provision of ensuring information to consumers is provided in a standard and useful way that allows interface with other (software and hardware) systems. As the number of retailers continues to grow, the market badly needs a set of rules for the transfer of consumption information. As there is also a growth of different energy management software systems trying to keep up with the myriad of different data packets and protocols, being supplied by these retailers, it is time for some standardisation of how consumption information is presented and exchanged. This initiative by the EA is therefore very welcome.
Q2.	What are your comments on the Authority's assessment of the problems arising from limited access to consumption data?	ETSL agrees with the EA's assessment that there is limited access, and as outlined above, agrees there are problems associated with that limited access leading to a lack of opportunities for improvement in competition and the ability of consumers to manage peak demand plus understand the performance/efficiency of plant and appliances.
Q3	Do you have any comments or suggestions about whether the criteria used in developing the proposal are a suitable basis for the proposed Code amendment?	These seem to be reasonable. We note the EA is proposing a period of five days as defining 'respond promptly', which we are comfortable with.
Q4.	Do you have any comments or suggestions about the requirement for retailers to provide consumption data?	ETSL believes that the responsibility for the provision of consumption data should rest with the electricity retailer. Just as retailers are responsible for organising the manual reading of non-smart meters, so they should continue to have the same responsibility for smart meters. It is immaterial, whether they store the interval data within their own IT storage systems or contract the storage to a meter provider, as long as the interval data is provided to the consumer in a timely and consistent manner. ETSL believes all consumers (individuals and businesses) should have access rights to their electricity consumption information, and this should be explicit in the EA Code amendments.
Q5.	Do you have any comments or suggestions about the process for responding to requests to	These appear to be reasonable.

	provide consumption data?	
Q6.	Do you have any comments or suggestions about the development of procedures requiring the supply of data using standardised formats and structures?	The development of procedures for the standardisation of formats and structures, should first list all items of information that could possibly be required to be transferred from the retailer to the consumer. By this we refer to kWh, kVAr, voltage, date and time stamp, EA levy, AC losses, local losses, daily fees, network fees, meter reading fees, reading type (estimate, actual, etc.), etc. Please note, we are also aware that there are occasions where multiple meters may be assigned to the same ICP. Therefore, another information identifier worth considering is to identify whether itemised consumption data is between the various meters and registers ascribed to one ICP a customer has, or totals on the ICP.
Q7	Do you have any comments or suggestions about whether retailers should be required to hold consumption data?	ETSL believes that in all cases the retailer has a responsibility to the consumer in ensuring they can provide their interval data if so requested. This does not necessarily require the retailer to store this within their own storage systems, provided the party they have tasked this responsibility to, can fulfil all timely requests from consumers or their agents, for the supply of their interval data.
Q8	Do you have any comments or suggestions about the requirements of the process for providing interval data?	Where metering technology is capable of capturing interval data, this shall be offered to the consumer as part of the supply of information at the time of invoicing. If a consumer requests that interval data should be provided to cover the same time period the invoice is for, then this will not be regarded as one of the four free requests, but rather the routine provision of information. We believe this will not place an undue burden on the retailer as this process can, and should, be automated. The interval data will include every dataset as captured by the meter, for example, kW, kVAr, voltage, time and date stamp. We suggest that interval data is standardized at 30 minute intervals, but that an option of receiving it in four-hourly blocks is also provided. Furthermore, we believe this should form part of the rules requiring retailers to hold this data for say two years, to provide it to customers free of charge, and that any information sought beyond that timeframe would be able to be charged for (or not provided).
Q9	Do you have any comments or suggestions on privacy, confidentiality and security of consumer data?	No. The Consultation document seems to have clearly discussed the issues surrounding privacy, confidentiality and security of consumer data. We agree that these need to be upheld, as should the rights of the consumer to have free access, at no additional cost, to their consumption data.

Q10	Do you have any other comments or suggestions on the proposal?	This is a very welcome initiative that when implemented should really see no losers. The retailers will have the opportunity to provide additional differentiation between their retail offering and those of others, there will be the opportunity for innovation and new market entrants providing services using the consumption data to help consumers and consumers themselves, will become more engaged and informed about the electricity market. As consumers become more engaged, so they will become more discerning, which will lead to increased awareness of options, and expectations of their retailers.
Q11	Do you agree that the purpose and objectives of the proposal as set out in section 5.2 are appropriate and consistent with the Authority's statutory objective? If not, why not?	Yes, absolutely.
Q12	Do you agree that the proposal is preferable to other options? If not, please explain your preferred option in terms consistent with the Authority's statutory objective.	ETSL believes Option 1 is the best option, with the next best alternative being Option 4. Option 2 plainly isn't working satisfactorily and we agree will not meet the EA's objectives. Option 3 will not adequately meet the needs of supplying interval data and is in our opinion, cumbersome.
Q13	In particular, do you agree that option 1 is better than option 4?	The response of retailers and other market players to Option 1 will ultimately determine whether Option 1 or 4 moves the market forward in terms of providing improved services to consumers. Whilst the EA is correct in that Option 4 would provide delayed results, it should however not be ruled out.
Q14	What are your views on the establishment of a centralised meter data store at some point in the future?	We are not against this alternative to Option 1, but believe requiring retailers to meet the objectives in Option 1 should be deployed first. Perhaps moving to a centralised meter data store could be managed in conjunction with Option 1, i.e. deploying Option 1 as an initial approach and then steadily migrating to where Option 4 has been created and is populated with two-years consumption data.
Q15	Do you agree with the assessment of benefits, costs and net benefits? If not, please explain your reasoning.	The assessment of costs and benefits appears reasonable. There are certainly significant benefits to this project proceeding, with the benefits almost certain to outweigh the costs. From a NZ Inc. perspective, we see a more informed consumer that will be able to react to peaks in their consumption and deployment of efficiency measures. This could well reduce requirements for distribution companies to make additional significant investments in their network infrastructure to meet increases in peak loads. As energy efficiency amongst

		consumers increases, this should allow NZ to meet future growth in domestic demand as a result of migration from existing generation, which should see prices remain affordable for consumers.
Q16	Do you agree that with the Authority's assessment that the proposed Code amendment meets the requirements of Section 32 of the Act?	Yes.