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25 August 2014

Submissions
Electricity Authority
PO Box 10041
Wellington 6143

Consultation Paper – Access to Consumption Data

Energy Direct NZ (EDNZ) appreciates the opportunity to make a submission on the Electricity Authority's consultation paper 'Retail data project: access to consumption data'

EDNZ have no issue with our Consumers having access to their Consumption\Billing data that we hold and regularly provide monthly read information when requested.

EDNZ are concerned at the proposal to legislate for Retailers to be responsible for the collection and storage of half-hour metering information for sites where they have a Consumer supplied with electricity. This responsibility currently lies with the MEP under The Code.

This proposal would impose a significant cost and lead in time only to the Retailers who have chosen to contract these services to the MEP for each site, or rely on manual meter reading.

Yours sincerely

A handwritten signature in black ink, appearing to read "Deborah Anderson", with a long horizontal line extending to the right.

Deborah Anderson
Project Manager

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Question No.	General comments in regards to the:	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?	The description of the current situation is not correct for all Retailers – for example - statement 2.4.3 “... Retailers arrange for metering equipment providers (MEP’s) to collect consumption data on their behalf” EDNZ manually read all meters, EDNZ has no contracts in place to receive interval data from the MEP. - statement 2.4.4 “... AMI has enabled Retailers to gather significantly more data about consumption” Only if the Retailer has made that choice. - statement 2.4.10 “... This means that the data that Retailers record is mostly interval data where this is a smart meter.” This statement is also not correct. Retailers can choose NHH settlement for a site with a Smart Meter installed so currently no requirement to store interval data.

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Q2.	What are your comments on the Authority's assessment of the problems arising from limited access to consumption data?	EDNZ do not agree with The Authority's conclusion that limited access to consumption data <u>is</u> limiting retail competition. Two separate issues seem to be mixed together in this section - <u>Retailer access to consumption data</u> example used of one Retailer's innovation (monitoring service - with others also in existence), confirms that progressive Retailers are already using their data to be market leaders without it being prescribed in the Code. As well as price, Consumers consider Retailers' varying offerings in their decision to switch. In an open and competitive market Consumers should be able to choose between a Retailer with less features and one that offers extensive online web services but may have higher prices. The Executive Summary states the very point "Consumers engage in the buying process by making well-informed and well-reasoned decisions which reward suppliers that best satisfy their needs." <u>Consumer access to consumption data</u> Consumers know what time they usually set the Dishwasher going or put a load through their Clothes Dryer. Having access to consumption data will confirm known usage patterns but is totally unnecessary for the comparison of energy efficiency ratings of appliances or to assist with the decision to purchase and use timers and delay functions as suggested.
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?	Criteria used is reasonable but ultimate responsibility of the proposal differs significantly depending on which party is deemed to be the 'data custodian' as is referred to in the criteria.

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Q4.	Do you have any comments or suggestions about the requirement for retailers to provide consumption data?	EDNZ are opposed to the responsibility for collection and storage of interval consumption data being with the Retailer. EDNZ manually read all meters, if a Customer has a smart meter this data will be held by the MEP and EDNZ has no contracts in place to receive this information.
Q5.	Do you have any comments or suggestions about the process for responding to requests to provide consumption data?	statement 4.3.15 "... consistent with current requirement for <u>retailers</u> to keep .." The sections referenced refer to MEP's current responsibilities not the Retailers?
Q6.	Do you have any comments or suggestions about the development of procedures requiring the supply of data using standardised formats and structures?	EDNZ are in support of a standardised format eg EIEP3A, but unless mandatory Consumers will receive the data in varying formats. EDNZ are concerned at the sheer volume that a Customer could receive 1. without excel 2007 (or more recent) they man not even be able to open the file 2. without some industry knowledge (or even file headers) they will struggle to make use of what they have received Eg 0000000068CP791 3 Registers UN, N, D Customer at this site has been with EDNZ since 02/08/2013. If they were to request their data, they would receive a file with 52,416 'INT' rows (364 days x 48 trading periods x 3 registers). Double that if they Customer had been with us over 24 months.

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Q7.	Do you have any comments or suggestions about whether retailers should be required to hold consumption data?	As per Q4 - EDNZ are opposed to the proposal for Retailers to be required to hold half hourly consumption data. This would unfairly impose a significant cost to <u>only</u> those retailers who do not currently store the data themselves. This may also be an additional barrier to any potential new entrant retailers in the market.
Q8.	Do you have any comments or suggestions about the requirements of the process for providing interval data?	The suggested five business days timeframe in itself is not unreasonable to produce a response file <u>but</u> the request needs to be considered in context as an additional work-stream for already busy Retailers. While EDNZ agree that “the marginal cost of repetitive standard requests is likely to be negligible”, the cost and time to initially develop the response output has not been addressed.
Q9.	Do you have any comments or suggestions on privacy, confidentiality and security of consumer data?	Does the suggested five business days timeframe start once the identity of the Consumer and/or authority of the consumer's agent is confirmed?
Q10.	Do you have any other comments or suggestions on the proposal?	Covered elsewhere
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?	No Imposing significant cost on only some (potentially smaller or new entrant) Retailers which would ultimately be passed to Consumers does not promote competition in or the efficient operation of the electricity industry.

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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.	Option 4 would be most preferable to retailers who do not currently store interval data as the cost associated with implementing this would be significant.
Q13.	In particular, do you agree that option 1 is better than option 4?	No
Q14.	What are your views on the establishment of a centralised meter data store at some point in the future?	Given that there are still unresolved issues with the data integrity on the Registry post 'Part 10', the additional complexities of developing, populating and maintaining a 'central meter data store' with date ranged ICP vs Meter vs Customer relationships would be prohibitive. Option 4 raises the point that a central meter data store would take 2 – 3 years to set-up. Will this same time frame be given to Retailers who currently do not receive or store interval data to become compliant?
Q15.	Do you agree with the assessment of benefits, costs and net benefits? If not, please explain your reasoning.	No Cost (and time) of system modifications differ substantially depending on the system being used and what current functionality is in place. EDNZ feel that the cost estimates are extremely light. Issue being overlooked is that Retailers won't be incurring the same costs.

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Q16.	Do you agree that with the Authority's assessment that the proposed Code amendment meets the requirements of Section 11.32 of the Act?	1. Consumption data would need to be to Meter Channel level for a consumer to effectively compare price offerings eg usage through the, 'Night' portion of a meter, rather than total combined usage through the ICP. EIEP3A format allows for data to the necessary level, the Code should reflect that – 11.32A (2) "... relating to Meter Channel level for each ICP ... " 2. 11.32A (3) "... if half-hour metering information is collected ... " Where a retailer manually reads all meters, including smart meters, each month - this clause in the section currently implies that if half-hour information has not been collected by the Retailer it will not be provided to the Consumer. 3. 11.32C the proposed requirement to notify consumers annually of their ability to request their consumption data is excessive. EDNZ believe that an inclusion in a Retailer's T&C's together with information on their website would be sufficient for Consumers who are inclined to understand and make use of the data received. An annual notification process will be an additional cost to all Retailers and ultimately Consumers.
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