

Electric Kiwi Limited
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Auckland City 1143

26 August 2014

Submissions
Electricity Authority
PO Box 10041
Wellington 6143

Consultation: Retail data project - access to consumption data

Dear Sir/Madam,

Electric Kiwi welcomes the opportunity to provide feedback to the Electricity Authority on the issues raised and initiatives proposed in the "Retail data project: access to consumption data" consultation paper.

Electric Kiwi as a start-up independent retailer is very supportive of initiatives that improve the information asymmetry that exists between incumbent retailers and new entrants regarding consumers demand profiles and the unique costs relating to serving them. We support the general direction of this paper but encourage the Authority to pursue solutions which require near real time sharing of consumption data, as delays of days or weeks to obtain access to data will provide an unsatisfactory consumer experience.

Detailed answers to the questions raised are included in Appendix A.

For any questions related to this submission, please contact:

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Appendix A: Submission

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?	We agree with the Authority's identification of a strong link between consumer engagement and retail competition. Improving access to timely consumption data will improve both.
Q2.	What are your comments on the Authority's assessment of the problems arising from limited access to consumption data?	Although data is currently available to consumers through some channels it is not widely used. If other authorised retailers or agents could retrieve and analyse consumption data on a consumers behalf there could be wide ranging benefits in terms of innovation and price in retail offerings. If the process is too complicated from the consumer's perspective engagement is likely to be low.
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?	There needs to be a focus on the timeliness of data provision. Consumers will lose interest if the process takes days or weeks to receive results. The highest levels of consumer engagement will be achieved by having near real time requirements for data access. A central repository of consumption data is probably the best way to achieve this.

Q4.	Do you have any comments or suggestions about the requirement for retailers to provide consumption data?	24 months of data is sufficient. We would prefer a central repository of data with quick delivery times. If it remains a bilateral data exchange, we suggest that all retailers with over 50k ICPs should have to deliver the data within 10 seconds of request (automated back office exchange). Smaller retailers could have a longer period of 24 hours to supply data while they grow the capability to meet the tighter time frames.
Q5.	Do you have any comments or suggestions about the process for responding to requests to provide consumption data?	The Authority should make timely delivery of data a priority.
Q6.	Do you have any comments or suggestions about the development of procedures requiring the supply of data using standardised formats and structures?	We support standardised data structures.
Q7.	Do you have any comments or suggestions about whether retailers should be required to hold consumption data?	If there is no central repository retailers should be required to hold data.
Q8.	Do you have any comments or suggestions about the requirements of the process for providing interval data?	The Authority should pursue near real time exchanges of data. Consumers will not be engaged effectively with wait times of up to 5 days; and modern technology makes near real time data exchange very feasible for large retailers. Obstructing and slowing data sharing is in an incumbent retailer's financial interests if it weakens competition.
Q9.	Do you have any comments or suggestions on privacy, confidentiality and security of consumer data?	No.
Q10.	Do you have any other comments or suggestions on the proposal?	Again, we urge the Authority to pursue near real time data access.

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.
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.	No. We think a central repository is preferable, with bilateral data exchange with near real time requirements on large retailers as a secondary option.
Q13.	In particular, do you agree that option 1 is better than option 4?	No. Option 4 is our preferred proposal. The Authority should pursue this option to get the best outcome for consumers.
Q14.	What are your views on the establishment of a centralised meter data store at some point in the future?	It should be implemented as soon as possible.
Q15.	Do you agree with the assessment of benefits, costs and net benefits? If not, please explain your reasoning.	We don't believe sufficient weight has been placed on the timely provision of data in the benefit analysis.
Q16.	Do you agree that with the Authority's assessment that the proposed Code amendment meets the requirements of Section 32 of the Act?	We believe the requirements on delivery of data are too slow to result in a step change in consumer engagement.