

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?	Arc believes that all MEP's who provide smart metering services within New Zealand make interval data available to all retailers, under rigorous SLA's, as part of their default service offering. As an MEP supplying interval data to a number of retailers it is evident that most of these retailers have requested the daily provision of this data with the express intention of making the information available to their customers in a timely manner. In the case of Arc supplied HHR data, this data is made available by retailers to their customers commencing the morning after the data was recorded and customers are also being provided with at least 12 months historical consumption data if they have occupied the premise and been a customer of the retailer over this period. Arc's observation is that any customer of these retailers already have the ability to subscribe (at no cost) to view their detailed consumption history both online and/or via daily email reports. Further it is evident that these retailers have been investing heavily in the tools which they provide to their customers to enable them to have ready access to detailed consumption data and to give insights into this information to suggest how the customer could modify their behaviour in order to reduce costs. These tools are a source of service differentiation and are actively being used as part of the retailer's customer acquisition activities. If access to this information is valued by the consumer, surely then those retailers presenting this information to consumers in the most usable / beneficial ways will gain market share over others who have no such tools or less capable ones? 2.4.18 recognises the effort retailers are making to provide such value added services, however this is to the benefit of both new and existing customers. Some retailers are known to provide customers with tools which enable customers to extract the HHR data so that it can be analysed externally / via 3rd party applications.
Q2	What are your comments on the Authority's assessment of the problems arising from limited access to consumption data?	Within any market economy it is not in a seller's best interest to facilitate the ready like-for-like comparison of products/services to those of their competitors. As noted in the consultation document, the ability to make relevant and accurate comparisons between retailer tariff offerings involves a degree of guesswork today. Ensuring customer access to HHR data in a standard format would improve the ease with which a 3rd party service such as 'What's My Number' can provide accurate and relevant advice with respect to retailer/tariff offerings available in the market.
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?	Section 4.2.2 (b) suggests there should be a maximum cost per request, however 4.3.30 states the first four requests per year must be free?
Q4	Do you have any comments or	NA

	suggestions about the requirement for retailers to provide consumption data?	
Q5	Do you have any comments or suggestions about the process for responding to requests to provide consumption data?	Provision of historical HHR data or register reads must be limited in line with the contracted period over which the customer can be verified to have occupied the premise and been a customer of the retailer. Half hourly data is already being provided by some retailers in easy to read formats, should this be imposed upon all retailers? Isn't this removing their competitive advantage and reducing the incentives of these retailers to continue to invest in the provision of value-add tools?
Q6	Do you have any comments or suggestions about the development of procedures requiring the supply of data using standardised formats and structures?	NA
Q7	Do you have any comments or suggestions about whether retailers should be required to hold consumption data?	Retailers could contract out this responsibility to an agent (an MEP or an Energy Services company).
Q8	Do you have any comments or suggestions about the requirements of the process for providing interval data?	As already mentioned in response to Q1, some retailers already provide access to detailed consumption information at no charge to their customers. Arc suggests that if customers elect to request their consumption information from a retailer other than via the existing (free) systems already made available to them that all such requests should attract a reasonable charge reflective of the actual cost to deliver the information. MEPs already hold this consumption data and can provide a service to Retailers should they wish not to store this data, but there should reasonably be a charge for provision of this service also.
Q9	Do you have any comments or suggestions on privacy, confidentiality and security of consumer data?	Arc agrees that the retailer must confirm that they are only providing data to a customer who is entitled to receive it. Even if MEP's were involved in supplying data directly to a consumer, as the retailer is the only entity with a direct contractual relationship with the consumer, the retailer would need to supply the MEP with all necessary authorisations.
Q10	Do you have any other comments or suggestions on the proposal?	As smart meters have been actively deployed in NZ since 2006 ARC suggests the MEPs might be a better provider of the data as they hold all of the customer data from the metering installation. The current retailer will only be able to provide data relating to the period where the consumer has been a customer of theirs, forcing the consumer to make multiple requests across retailers in order

		to procure the full consumption history for their premise.
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?	As discussed in Q5, some retailers are already providing this service as a form of competitive advantage to both acquire and retain customers. By imposing this on all retailers the proposal may be removing competition, that is, removing the incentive to invest in provision of value add tools and resulting in generic, undifferentiated service offerings. Arc has been approached by several new entrant retailers for the provision of smart metering services over the past months. Any proposal which increased the cost of compliance may also reduce competition in the market. Further, the market economy has already identified the need to provide detailed consumption information to consumers as witnessed by the solutions which have been developed, and are continuing to be developed by, many retailers – all of which are offered to consumers at zero cost. Efficiency may be improved by mandating certain minimum retailer service requirements – such as the ability to extract HHR data from the provided online tools and the ability to do so in a standards compliant format.
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 1 is preferred but only as much as it will support the market from fulfilling consumer needs without recourse to regulation (refer response to Q11)
Q13	In particular, do you agree that option 1 is better than option 4?	Arc recommends that Option 4 be removed from consideration until such time as a detailed cost-benefit study was undertaken.
Q14	What are your views on the establishment of a centralised meter data store at some point in the future?	Refer to response to Q13.
Q15	Do you agree with the assessment of benefits, costs and net benefits? If not, please explain your reasoning.	NA
Q16	Do you agree that with the Authority's assessment that the proposed Code amendment meets the requirements of Section 32 of the Act?	NA