

26 August 2014

Submissions
Electricity Authority
PO Box 10041
WELLINGTON

via email: submissions@ea.govt.nz

Dear Authority,

Thank you for the opportunity to provide feedback on the consultation paper *Retail Data Project: Access to Consumption Data*.

While Contact supports transparency and enabling consumer choice, we believe that it is customers who should define what this looks like. Our key concern is that there is no supporting evidence that what is being proposed is what consumers want, or that they would find it useful. We also believe the costs of implementing this change have been severely underestimated.

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?	In response to c. the Authority's assumption appears to be that consumers are not able to easily access consumption data in a form useful to them and that changing this will increase customer engagement. Given that a significant amount of data is already made available, and that these assumptions drive the rest of the proposal, these assumptions should be tested by objective customer research before costly changes are mandated.
Q2.	What are your comments on the Authority's assessment of the problems arising from limited access to consumption data?	We do not believe there's a convincing case that there is a material problem, or that the benefits of the proposal would outweigh the costs.
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?	Yes. The 'reasonable cost' recovery principle in para 4.2.2 (b) has not been carried into the proposal.

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Q4.	Do you have any comments or suggestions about the requirement for retailers to provide consumption data?	The 24 months of data held may not be half hourly interval data as not all customers have smart meters. Hence accurate half hourly /trading period interval data will not be able to be provided for some customers. Additionally due to system changes 24 months of data may be difficult to provide.
Q5.	Do you have any comments or suggestions about the process for responding to requests to provide consumption data?	No.
Q6.	Do you have any comments or suggestions about the development of procedures requiring the supply of data using standardised formats and structures?	There are likely to be circumstances where the retailer does not collect interval data from the MEP. For example, the retailer may have a low service business model that does not use consumption data except to issue bills. The requirement to hold interval data will impose additional costs on these retailers, which are likely to be passed through to customers. Should this proposal proceed transitional arrangements should be provided giving substantial time to all retailers to build any new processes or systems needed to comply.
Q7.	Do you have any comments or suggestions about whether retailers should be required to hold consumption data?	We do not believe it matters whether a retailer holds this data themselves provided they are able to obtain it as required e.g. from MEP or smart meter service provider.
Q8.	Do you have any comments or suggestions about the requirements of the process for providing interval data?	Depending on the number and frequency of customers using such a service this could drive significant costs for retailers. These costs are likely to ultimately be borne by consumers.
Q9.	Do you have any comments or suggestions on privacy, confidentiality and security of consumer data?	Special consideration must be given to the privacy, confidentiality and security of consumer data.
Q10.	Do you have any other comments or suggestions on the proposal?	Yes. We believe the costs are significantly understated.

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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?	While we support the purpose i.e. to improve the ability of consumers to participate in the retail market and increase consumer engagement, we do not believe the proposal, as it stands, will achieve this.
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 comment.
Q13.	In particular, do you agree that option 1 is better than option 4?	No comment.
Q14.	What are your views on the establishment of a centralised meter data store at some point in the future?	While this is technically feasible it is likely to drive extra costs. Therefore we believe it should only be considered if a decentralised model of data provision to customers doesn't work.
Q15.	Do you agree with the assessment of benefits, costs and net benefits? If not, please explain your reasoning.	No we believe the costs have been significantly underestimated.
Q16.	Do you agree that with the Authority's assessment that the proposed Code amendment meets the requirements of Section 32 of the Act?	No comment.

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