

Appendix A Format for submissions

Arc Innovations has no feedback for any of the questions other than Q15 in Part 3.

| Question No | General Comments in regards to the: | Response |
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| Q15 | What comments do you have on the Authority's preliminary thinking on how to achieve the objectives of part 3? | <p>Section 3.4.3 states: The Authority's preliminary thinking is that a process could be designed that enables individual consumers (or their authorised agent) to easily obtain a substantial section of their own consumption history in a standard format from the retailer or MEP that holds this data. This approach would be giving practical effect to the legal ownership of the consumer's data by the consumer.</p> <p>While this is perfectly reasonable, it should be noted that this service should preferably be provided by the appropriate retailer rather than the MEP for a number of reasons.</p> <ul style="list-style-type: none"> a) For non-AMI sites, the MEP often has no consumption data at all, since this is provided by meter reading services directly to the Retailer. The MEP usually neither collects, receives, nor retains readings for such sites. b) Although (for AMI) the MEP is the source of verified consumption data, they have no customer relationship since that is maintained solely by the Retailer. Hence they have no details on who is resident, nor legally responsible for, any specific site, and have none of the infrastructure to collect and retain such customer contact detail other than from the Retailer. c) As the MEP has no visibility of a customer's comings and goings at any specific ICP, they will be unable to meet their regulated obligations to ensure that data is only supplied to those legally allowed to access it. As the MEP cannot determine whether a specific customer has been at an ICP for days or years, they cannot ensure that data is not supplied for a period outside that when the customer was at the site. d) MEPs are, in general, structured to provide services to retailers. They currently neither have the processes, structure nor staffing to provide a customer call centre service, unlike retailers who already have this infrastructure in place. <p>The MEP is certainly able to provide the relevant data</p> |

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| | | to the Retailer on demand (although the Retailer will usually already have it), however that request should always be from the customer to the Retailer, and thence to the MEP. |
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