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**TRUSTPOWER SUBMISSION:
PROPOSED CODE AMENDMENTS – IMPLEMENTING RETAILER DEFAULT**

1 Introduction

- 1.1.1 Trustpower Limited (Trustpower) welcomes the opportunity to provide a submission to the Electricity Authority (the Authority) on its *Proposed Code amendments: Implementing retailer default* consultation paper (the Consultation Paper).
- 1.1.2 We have reviewed the Consultation Paper and agree that most of the suggested Code amendments appear logical. However, some of the outcomes the Authority is guarding against have an extremely low probability of occurring, so we are not convinced that the extra costs to the industry outweigh the benefits.

1.2 Suitability of storing customer information in the registry (Question 3)

- 1.2.1 Our greatest point of concern surrounds the provision of customer information to the registry. We are firmly of the view that the purpose of the registry is not to hold personal contact information – it is only to hold ICP-related information. We therefore strongly oppose Option 1, which would force customer information onto the registry (even if it is only visible to the trader responsible).
- 1.2.2 Our strong preference is for Option 2. Customer-related information should be held securely in a location separate to the registry, and visible to no one except in the situation of a trader default.
- 1.2.3 As mentioned above, the probability that the customer information is ever required is extremely low. This is the final step in a very comprehensive process, and also relies on the defaulting trader being unable to provide a more comprehensive dataset. We believe a defaulting retailer is most likely to have dealt with the vast majority of its ICPs itself. The problem therefore requires a solution with as low a cost as possible.

1.2.4 As an aside, we agree that the *Medical restriction type* field should be left blank. A gaining retailer will (and should) always follow its own processes to gain information regarding medical dependency at sign-up, and then verify that information if required. Having that information populated in the customer information file would (and should) be unlikely to change any processes that the gaining retailer would (or should) follow at sign-up.

1.3 Information on where parties can or cannot trade (Questions 2 and 6)

1.3.1 It would appear more logical and less costly to us to request information from parties on which ICPs/NSPs they *can* trade on, rather than those they *cannot*. We have information to hand on where we do trade, and update it regularly, but do not keep a list of where we do not trade.

1.3.2 Further, this information is only required in the event that a trader defaults AND the Authority is required to assign some of the ICPs of that trader. Again, this is a very low probability occurrence. It would therefore seem prudent to us to minimise cost by only requiring this information to be provided in the event that it is actually required. Failure to do so would be a breach of the Code.

1.3.3 While a good test of processes, requiring the provision of information before that information is required is pointless from a practical point of view, as the information will be out of date fairly soon afterwards.

1.3.4 For any questions relating to the material in this submission, please contact me on 07 572 9888.

Regards,



JAMES TIPPING
REGULATORY STRATEGY MANAGER