



12 May 2015

Submissions
Electricity Authority
By email: submissions@ea.govt.nz

Consultation Paper – Retail Data Project: Access to Consumption Data Formats and Process Document

Meridian appreciates the opportunity to comment on the above paper in this submission also provided on behalf of Powershop.

As we detail in our comments in Appendix One attached, Meridian considers some improvements are needed to the draft procedures and EIEP formats. Depending on the agreements they have in place with metering service providers, retailers may be unable to provide register level data like the draft EIEP 13A and 13B formats require. We request the proposed requirements are further considered by the Authority and consumption data formats technical group because of this.

Our more general feedback is as follows:

- As we've suggested previously¹, it is essential the arrangements allow retailers to continue to adapt and respond to the needs and preferences of their customers. We agree with having the draft EIEP 13B only apply in instances where equivalent information is available for this reason.
- While we see no reason why the intended arrangements could not be used to process requests in reasonable volumes, it is unclear how they will perform for considerably higher volumes. It is important the Authority remains open to adapting the arrangements should the scale of requests create the need to do so.
- We consider certain timeframes in the Code and draft procedures document require adjusting. We are concerned the 5 business day requirement to provide information leaves little time to determine whether an agent is properly authorised (for instance, if difficulties are encountered in contacting the customer). This is a

¹ Refer Meridian/Powershop's 26 August 2014 submission, available <http://www.ea.govt.nz/dmsdocument/18453>

concern we understand has already been raised with the Authority by the consumption data formats technical working group. An amendment is also suggested to align with the 12 monthly notification requirement specified in 'low fixed charge' regulations.

- Meridian is currently assessing its ability to complete implementation by February 2016, based on additional information the draft formats and procedures have provided. There are a number of challenging elements to implementing new Code requirements cost effectively, including determining an appropriate degree of automation due to uncertainty around the possible numbers involved. With consumption data formats and procedures still yet to be finalised, retailers in effect will also be provided with considerably less time than the 12 month implementation period allowed for in recent file format implementation projects (the mandating of EIEP 1, 2 and 3, for instance). We expect to engage more on this shortly with the Authority.

If you have any queries regarding this submission please contact me.

Yours sincerely,



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Appendix One: Responses to Consultation Questions

	Question	Response
1	Do you have any comments on the draft procedure document for the exchange of consumer consumption information?	<p>Meridian considers the guidance the procedures provide for determining whether half hourly (HHR) or non- half hourly (NHH) information is required needs further clarification.² The procedures as currently drafted do not make clear:</p> <ul style="list-style-type: none"> • Whether holding HHR data on file alone, without it being used provide services to customers, would require HHR data to be disclosed. • If HHR data not previously used to provide services were to begin to be used for a short time within a customer’s term, whether the data is to be made available for the full 24 months. <p>We request the paragraph 17 and also Code clause 11.32C reference to advising customers of their ability to request data ‘once in each calendar year’ is amended to refer instead to notifying customers ‘once in every 12 months’. This amendment is suggested to align with clause 12(1) of Electricity (Low Fixed Charge Tariff Option for Domestic Consumers) Regulations and would enable retailers to bundle notifications to customers if desired.</p> <p>We consider the paragraph 21 requirement for retailers to enable requests to be made by phone requires re-drafting to clarify that retailers could then refer the customer to a source (web-portal, for instance) where the information can be found.</p>

² Refer paragraphs 3-9 of the draft procedures.

	Question	Response
2	Do you have any comments on the draft EIEP 13A?	<p>Meridian considers additional guidance is needed on how variances with invoice data are to be managed. For various reasons, including that retailers will be required in some instances to provide non-certified information³, it can be expected that there will at times be mis-alignment in EIEP 13A information retailers provide and the data used to invoice the customer. Where variances are material, this could cause confusion and potentially detrimental outcomes if relied on to assess alternative tariff options. At a minimum, we consider clearly communicating with consumers the potential for differences to arise will be important.</p> <p>Depending on their agreements with metering service providers, retailers may only have available 'element level' rather than the detailed 'register level' HH data that the draft EIEP 13A and 13B formats propose. It is unclear how this is accommodated for in the current drafts. Meridian requests the Authority works with the consumption data formats technical working group to consider possible ways the formats could be adjusted to account for this.</p> <p>We question whether the ANZSIC code field is necessary.</p>
3	Do you consider there are any alternatives to an EIEP 13A? Please give reasons for the alternatives.	<p>Unsure.</p> <p>Meridian has noted the Authority's suggestion that international formats would be prohibitively costly to adopt⁴ but we are unable to comment on this without knowing the scale of costs involved.</p> <p>We consider it is acceptable for the EIEP format to be the focus of current work to develop consumption data format standards.</p>

³ Required by paragraph 7 where it is specified that retailers are to provide the most detailed information (HHR) available, irrespective of whether it is certified.

⁴ Discussed in paragraph 3.1.3 of the consultation paper.

	Question	Response
4	Do you have any comments on the proposed EIEP 13B? Please give reasons and discussion where you disagree.	<p>Meridian considers further clarification is needed regarding the intended differences between the EIEP 13B and 13A formats. For instance, while material appended to the consultation paper indicates the 13B format differs through its focus on release of the actual data used to generate the customer's invoice – irrespective of whether more granular information could be held – this is in contrast to details specified elsewhere (paragraph 3.5.4 for example).</p> <p>Meridian would like to understand more about the reasons why the 'tariff code' field is proposed to be included. With all retailers having their own methods for designing and classifying tariffs, it is unclear to us what value this would add.</p> <p>See also comments in response to question (2) regarding metering service agreements in some instances not enabling access to register level data as the draft EIEP 13A and 13B format envisage.</p>
5	Do you consider there are alternatives to an EIEP 13B? Please give reasons for the alternatives.	<p>As the Authority's proposals recognise, retailers could provide the information themselves. We consider it is important retailers retain the ability to offer alternatives i.e. to have, as per the Authority's proposals, the 13B format apply only if equivalent information cannot be accessed on-line.</p> <p>See also response to Q3 above.</p>

	Question	Response
6	Do you currently have a method for providing a consumer consumption information? If yes, what is the method and does it include the information that is in EIEP 13B?	<p>While not available to download, Meridian provides its 'MyMeridian' residential customers the option of viewing their consumption information. <i>[Withheld]</i>. Our Time of Use account managed customers can download all their TOU information. The data presented will not always incorporate all of the suggested EIEP 13B information, for instance, because register-level data may not be available. See our responses to Q2 and Q4 for further discussion on this.</p> <p><i>[Withheld]</i>.</p> <p>All Powershop customers can currently view and download their meter reading values, and customers with an AMI meter can graphically view their half-hourly consumption. If requested, Powershop can provide its customers with a download of their half-hourly consumption. The information provided in these instances does not contain all the register specific information in EIEP13B (e.g. RCC/POA) as it is aggregated to a meter level rather than register level.</p>

	Question	Response
7	Do you agree that an EIEP 13C is required? Please give reasons and discussion where you disagree or consider there are alternatives.	<p>Unsure, but potentially yes.</p> <p>Meridian agrees that there could be benefit in having a standard method for agents to electronically request consumption data, which would enable automation of the processing of requests.</p> <p>As mentioned in our cover letter, it is difficult to know how many requests retailers are likely to receive from agents and therefore also difficult to know how much to invest in automation at this stage. Any additional information the Authority could provide to assist retailers on this matter would be welcomed.</p> <p>We also note the draft as it stands provides no mechanism to reject a data request i.e. if a retailer is unable to verify with a customer that an agent's request has been authorised or of a request has been sent in error for an ICP that the retailer does not hold data for.</p> <p>If implemented, we consider agents should only be able to submit requests using the EIEP 13C format i.e. that retailers should not also have to manage requests via email, phone and other channels.</p>
8	Do you agree that an electronic request form should be provided to allow machine to machine requests provided that the retailer has verified the consumer's request? Please give reasons where you disagree.	See response to Q1 above.

	Question	Response
9	Do you agree with the use of a Consumer Authorisation code in EIEP 13C? If you disagree please give reasons.	Because retailers will likely continue to carry out their own checks (e.g. because of potential inaccuracies in the code recorded), Meridian is unsure of the value of an authorisation code will provide.
10	Do you agree that the registry EIEP transfer hub should be used as one of the transfer mechanisms for EIEP 13A and 13C? Please give reasons where you disagree.	Yes.