

Retail Data Project: Consumer Access to Consumption Information - formats and procedures

Submissions summary and responses

22 May 2015



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1 Introduction

- 1.1 The Electricity Authority (the Authority) is undertaking a project that seeks to improve access to information about retail prices, retail tariff options and consumption by electricity consumers. The initiative seeks to improve retail market arrangements to better deliver outcomes for the long-term benefit of consumers.
- 1.2 The Retail Data Project is divided into three phases, which are respectively investigating access to:
 - (a) consumption information
 - (b) tariff and connection information
 - (c) monitoring information.
- 1.3 Further background is available on the Authority's website at <http://www.ea.govt.nz/development/work-programme/retail/retail-data/>.
- 1.4 The phase of the project to which this paper relates seeks to improve access by consumers to information about their own electricity consumption. The Electricity Industry Participation Code (the Code) was recently amended to add relevant new provisions.¹ Clause 11.32F requires the Authority to publicise procedures that retailers must use when responding to requests for consumption information by consumers or their authorised agents. The procedures must specify the manner in which information is given to consumers and one or more formats in which the information must be packaged for transmittal.
- 1.5 Seeking to finalise the procedures and formats prior to their publication, the Authority:
 - (a) sought input from a technical working group on draft formats and procedures on 17 March
 - (b) published a consultation paper on 28 April 2015 titled *Retail Data Project: Access to Consumption Data Formats and Process Document* that provided draft formats and procedures.
- 1.6 The purpose of this paper is to:
 - (a) summarise the submissions received
 - (b) provide the Authority's responses
 - (c) provide updated versions of the procedures and formats for publication.

¹ The new Code provisions start at clause 11.32A.

2 How is this summary and responses paper structured?

- 2.1 Section 3 identifies the parties that provided submissions by the closing date for this consultation.
- 2.2 Sections 4 - 7 summarise the submissions received by the closing date of 12 May 2015.
- 2.3 The summaries are organised by consultation question in the following order:
 - (a) EIEP 13A (section 4 of this paper, addresses consultation questions 2 and 3)
 - (b) EIEP 13B (section 5 – consultation questions 4 – 6)
 - (c) EIEP 13C (section 6 – consultation questions 7 – 10)
 - (d) the procedures document (section 7 – consultation question 1).
- 2.4 Responses with common submission themes follow the summaries provided in each section.
- 2.5 Detailed responses to each submission point organised by question then by submitter are provided in Appendix A.
- 2.6 Updated and finalised versions of the procedures paper and the three new EIEP format documents are available on the Electricity Authority website:
<http://www.ea.govt.nz/operations/retail/retailers/>

3 Parties that provided submissions

- 3.1 Nine submissions were received by the closing date for this consultation.
- 3.2 The following seven retailers made submissions:
 - (a) Contact Energy
 - (b) Electric Kiwi
 - (c) emhTrade
 - (d) Genesis Energy
 - (e) Meridian (this submission is also on behalf of Powershop)
 - (f) Mighty River Power
 - (g) Trustpower
- 3.3 The following two parties also made submissions:
 - (a) Cortexo
 - (b) Saveawatt

- 3.4 The Authority appreciates the effort that submitters expended in providing their submissions.

4 Submissions and responses relating to EIEP 13A

- 4.1 EIEP 13A is a format for reporting detailed electricity consumption information for use by consumers or their authorised agents. It is designed to be suitable for both half hour (HHR) and non-half hour (NHH) consumption information.
- 4.2 Submissions on questions 2 and 3 provided a number of suggested detailed improvements to the EIEP 13A format and some more general comments around alternative transmittal mechanisms.
- 4.3 In response to submissions on question 2, the Authority has applied a number of amendments to the EIEP 13A format to address specific points raised by submitters.
- 4.4 With respect to question 3, most submitters were supportive of the approach adopted by EIEP 13A. Some submitters considered that aspects of EIEP 13A were overly prescriptive and may stifle innovation in the provision of consumption information to consumers/agents. In particular, Genesis considered EIEP 13A should be a default format to be used should a retailer and a consumer not agree an alternative.
- 4.5 Trustpower submitted in favour of a web-based request/authentication/delivery self-service approach.

Authority response

- 4.6 The Authority notes that the new Code provisions regulating access to consumption information effectively provide a default set of requirements that consumers and their agents can use if retailer-initiated alternatives fall short of meeting consumer needs. If alternative access to consumption information is provided by the retailer that better meets consumer/agent needs then a request under clause 11.32B² of the Code would be unlikely.

² 11.32B Requests for information

- "(1) A **retailer** to which a request is made must give the information to the **consumer** no later than 5 **business days** after the date on which the request is made.
- "(2) In responding to a request, the **retailer** must comply with the procedures **publicised** by the **Authority** under clause 11.32F.
- "(3) A **retailer** must not charge a fee for responding to a request, but if 4 requests in respect of a **consumer's** information have been made in a 12 month period, the **retailer** may impose a reasonable charge for further requests in that 12 month period.

- 4.7 The key advantage of the Code approach is that it provides standard formats and procedures regulating access to consumption information. Retailers and recipients (in particular agents) will only have to develop interoperability EIEP-formats once. The EIEP data exchange hub provides a standardised interface that addresses a number of practical issues around authentication, transmission security, auditability and handling of large electronic files.
- 4.8 However, retailers have developed, and remain free to develop, alternative innovative processes they consider will better meet their consumers' needs. At a minimum, however, retailers must comply with their obligations in respect of the standard formats required in clauses 11.32A – 11.32F of the Code.

5 Submissions and responses relating to EIEP 13B

- 5.1 EIEP 13B is a format for reporting summary consumption information for consumers or their authorised agents. It was initially designed to be suitable for NHH summary consumption information only but was extended at a late stage in the development of the formats to also provide for HHR data.
- 5.2 Several submitters considered that the proposed inclusion of HHR data within the EIEP 13B format diffused its primary focus, which was to be a summary of billing-related consumption information for consumers. Some also considered it made the format overly complex.

Authority response

- 5.3 The Authority has considered these views and agrees that the proposed inclusion of HHR data diffuses the focus of the format. Accordingly, the Authority has decided to remove HHR data from the format. Providing summary information only will significantly lessen the potential volume of information that might otherwise result from an EIEP 13B formatted report.
- 5.4 A number of format inconsistencies highlighted by submitters have been addressed in the updated EIEP 13B.
- 5.5 In response to question 6, submitters provided a range of information about the methods by which they currently make consumption information available to consumers. These methods variously describe methods of access to, and in some cases download of, detailed and summary level consumption information and analysis (such as by charts). The Authority notes that there is no de facto approach that would allow access to consumption information by agents on behalf of consumers, where consumers have authorised this. The EIEP formats seek to meet this need.
- 5.6 One submitter was concerned that EIEP 13B summary level information would omit non-consumption charge components of the consumer's invoice (eg details of fixed charges, eg daily charges). The Authority notes that this is a

consequence of the Code amendment applying to consumption information only. Details of fixed charges and other charges should be available from the retailer, for example from the retailer's published and/or notified pricing information for consumers.

6 Submissions and responses relating to EIEP 13C

- 6.1 EIEP 13C is an electronic format intended for use by agents to request consumption information on behalf of consumers.

Submissions on the need for EIEP 13C and its scope

- 6.2 Submissions on question 7 indicated broad support for the retention of EIEP 13C as a standardised electronic means by which agents may request consumption information on behalf of consumers. Some submitters considered EIEP 13C formatted requests submitted via the EIEP hub should be the only means by which agents could request and receive consumption information on behalf of consumers.
- 6.3 Contact and Genesis expressed support for an additional format that would enable full automation of request management by providing a standardised electronic format for use by the retailer, if the retailer found it necessary to decline a request.

Authority response

- 6.4 The Authority notes the strong level of support for EIEP 13C, has considered submissions relating to the detail contained within the draft format and made amendments where it considers these improve the format.
- 6.5 The Authority considers the development of additional functionality to automate retailer responses if a request is declined will further enhance the efficiency of electronic request/response facilities. The Authority welcomes Genesis's inclusion of a draft of EIEP 13D in its submission as an illustration of the functionality envisaged.
- 6.6 Having reviewed the submitted EIEP 13D format, the Authority considers that this functionality can be more simply provided by adding a 'response code' field to the EIEP 13A and EIEP 13B formats. Thus, in response to an EIEP 13C request, the sender would receive a EIEP 13A or EIEP 13B response in all cases that would contain either:
- (a) the requested consumption information; or
 - (b) no consumption information and an appropriate rejection reason code.
- 6.7 EIEP 13A and EIEP 13B have been updated to provide this 'rejection with reason' functionality.

Submissions on authorisation of agent requests

- 6.8 Submissions on question 8 addressed the issue of consumer authorisation of agent requests for consumption information made on the consumer's behalf, where the request is transmitted electronically.
- 6.9 Several submissions acknowledged the issue but there was no broad consensus on how to resolve it. Cortexo suggested that sufficient weight should be placed on the fact that the agent has gone through the process necessary to have authorised access to the EIEP hub.
- 6.10 emhTrade considered it was appropriate for the Authority to leave it to the respective parties (agents and retailers) to develop workable approaches that may be improved on in future as online identity technology develops.
- 6.11 Genesis's submission supported emhTrade's view that commercial arrangements between the parties, including entering into agreements and providing for auditability, would suffice.
- 6.12 Saveawatt considered that a single process agreed across all retailers would be desirable.
- 6.13 Trustpower considered that the relevant consumer should be required to first log into Trustpower's secure web portal to validate a request that would then be transacted by an agent. Alternatively, the consumer should transact the request and pass the received information on to the agent.

Authority response

- 6.14 The Authority acknowledges these concerns and agrees it is an important matter to resolve. Since retailers are responsible for the protection of consumer information under existing legislation, it ultimately falls to retailers themselves to authenticate requests for consumer information.
- 6.15 At this stage, the Authority considers the best approach is to leave it with individual retailers to adapt their existing authentication processes to meet this need. The Authority expects retailers to develop the most efficient processes possible that meet the need for proper authentication. The Authority will monitor this area and be open to feedback from all parties as the parties engage to develop best practice.

Customer authorisation code

- 6.16 Question 9 is about electronic authorisation and considered the Authority's proposal for inclusion of a Customer Authorisation Code in the EIEP 13C format.

Authority response

- 6.17 Most submissions were not supportive or did not appear to understand how it would work. This is a conditional field. If a retailer and a consumer's agent have agreed an authorisation code for a particular consumer's ICPs, it can be used. If

no code has been agreed, it should be left blank. Retaining the field allows retailers and agents to develop use at some future time if they wish to.

Use of the EIEP hub for electronic request/response by agents

- 6.18 Question 10 sought to gauge the level of support for use of the EIEP hub as at least one of the transport mechanism options.
- 6.19 Submitters expressed generally strong support for use of the EIEP hub as at least an option for agent/retailer transactions, with some retailers expressing the view that it should be the only option available to agents.
- 6.20 Consumer requests were seen by retailers as a separate consideration requiring a broader range of options for consumers lodging requests and retailers providing responses.
- 6.21 The Authority considers that retailers will need to be flexible in providing request and response functionality related to provision of consumption information. Agents are highly likely to develop electronic exchange capabilities to provide scale efficiencies in their businesses and at this stage the Authority does not consider it necessary to require their compulsory use of the EIEP hub.

7 Further submissions related to the procedures document

- 7.1 The procedures document is required to be publicised by the Authority under clause 11.32F of the Code. It is intended to provide more detailed guidance and requirements relating to the manner in which information must be given to consumers.
- 7.2 A number of submissions were received on the procedures document. Many of these were consequential to the matters of format detail already considered in sections 3 – 6 of this paper. These points have been responded to in sections 3 – 6 as relevant and in Appendix A.
- 7.3 The following subsections address additional key submission themes related to the procedures document that have not been addressed elsewhere. Having considered all submitted views, the Authority has updated the procedures document.

Further guidance for consumers

- 7.4 emhTrade considered there is a need to provide more customer-friendly guidance that gives a high level view on what the new Code provisions related to access to consumption information mean for consumers.

Authority response

- 7.5 The Authority agrees that there is considerable complexity ‘under the covers’ that would likely be beyond consumers’ understanding or need to understand. The Authority will be publicising suitable guidance material for consumers.

Retailer requests for consumption information from other retailers

- 7.6 Trustpower considered that retailers, acting as agents, could request historical consumption for every customer they gain through a customer switch and that this would lead to a high overhead in providing data.

Authority response

- 7.7 The Authority considers that gaining retailers might seek to obtain a switched customer’s historical consumption information but could only do so if the customer agrees. The Authority considers retailers will need to be careful about what rights related to this that they might seek to include in retail terms and conditions of supply.
- 7.8 Switched customers may be happy that their new retailer gains access to their consumption history, especially if there is a benefit to them, for example, if as a consequence they are offered the price option most favourable to them based on their recent consumption history.

8 Next steps

- 8.1 Having considered all submitted views, the Authority has updated the procedures document and the three EIEP formats.
- 8.2 The Authority has shared the draft updated formats with the Standing Data Formats Group (SDFG), which is a group that provides expert advice to the Authority on a variety of electronic information exchange formats in use within the industry.
- 8.3 Following consideration of the SDFG feedback, the Authority will finalise and publicise the procedures as required under clause 11.32F.

Appendix A: Submissions and responses by question

A.1 This appendix is organised by:

- (a) consultation paper question number
- (b) submitter, with verbatim submissions on each question
- (c) the Authority's response

A.2 Thematic summaries and responses are provided in the body of the paper.

Question 1: Do you have any comments on the draft procedure document for the exchange of consumer consumption information?

Related document: Procedures

Submitter	Submitter comment	Authority comment
Contact	Under clauses 16, 17 and 19 of schedule 15.2 retailers have an obligation to ensure all consumption volumes used for the purpose of energy settlement are validated. However where that data is not used for billing or settlement purposes retailers have no obligation to validate this interval data. The proposed procedure would require retailers to provide un-validated HHR data to consumers or their agents. Contact recommends the procedure be amended to require the provision of data only where it has undergone validation sufficient to satisfy clauses 16, 17 and 19 of schedule 15.2.	Data should be provided to the most granular level available to the retailer, regardless of its validation. Further direction is provided in the procedures and formats documents relating to this.
	Clarification should be provided on the type of estimates that are required to be provided as the data file specifications include a read status of E (estimate). Contact believes that only permanent estimates should be included in these files. For example, where a period bounded by two actual reads also has a number of estimate reads, it would only be appropriate to provide the consumption between the actual reads.	The EIEP 13B format has been clarified to apply to billing consumption volumes only. As such, actuals and estimates relate to how the consumption volumes have been determined by the retailer.
	Clause 7 – it is not clear what is meant by ‘certified’ and ‘non-certified’ ...	The procedures document has been

Submitter	Submitter comment	Authority comment
	<p>'information'. Is 'certified' intended to mean 'validated'?</p>	<p>modified to delete the use of the word "certified". EIEP13A requires the provision of the most granular information used by the retailer, and EIEP13B requires the provision of billing information.</p>
	<p>Notwithstanding, the Code amendment clause 11.32B(1) states "no later than 5 business days after the date on which a request is made". The procedure should clarify in clause 15 that the obligation in clause 11.32B(1) is after the date the requester provides the retailer with sufficient verification to confirm the consumer or that the agent is authorised by the consumer. In Contact's case, we require a number of points of verification to ensure the security of our customers' information.</p>	<p>The Code reference is to 11.32B(1). The time at which the 5 day period starts is reasonably the time that a requester provides sufficient information to process the request, including to identify themselves as a person duly authorised to make the request.</p>
	<p>There are inconsistent statements regarding the use of EIEP13C. For example, clause 21(c) states a "consumer must be able to request ... by electronic file request delivered by the registry EIEP hub", clauses 14 and 26(d) state "<u>agent may use</u>", while clause 41(d) states "<u>may only be used by agents</u>". It needs to be clarified in a table what consumers may use and what agents 'may' or 'may only' use.</p>	<p>Having considered submissions, we have clarified the purpose of EIEP 13C to be an electronic request format that an agent could use to request consumption information on behalf of a consumer that has authorised the agent to act on the consumer's behalf.</p>
	<p>Clause 41(e) appears incomplete – is "either EIEP13A" intended to be "either EIEP13A or EIEP13B"?</p> <p>Clause 42 states the "retailer must provide the requested file format ..." when it appears any request via EIEP13C is intended to trigger provision of EIEP13A only – refer EIEP13C 'Application' and 'Description of when this protocol applies', which both state this format is only used to request EIEP13A.</p>	<p>We have clarified that an EIEP 13C formatted request can specify return of either and EIEP 13A or EIEP 13B formatted consumption information.</p>

Submitter	Submitter comment	Authority comment
	<p>For all three EIEP formats, the clause numbering requires attention. Either the numbering needs to start with '1' for each section, or, the numbering needs to be sequential and cut across sections.</p>	<p>Agreed. We have tidied up all three formats.</p>
	<p>EIEP13C –</p> <p>Header record 'The Validation Rules' for 'Recipient Participant Identifier' does not fit with the 'recipient'; instead, it describes sender validation rules/identifiers. However, it seems to Contact there should be three fields: 'Sender name' (consumer or agent name), 'Sender identifier' (valid sender identifier – if a consumer, it must be CUST, or if an agent, it must be an approved agent participant identifier), and 'Recipient identifier' (valid retailer participant identifier).</p> <p>In any event, it seems that the EIEP13C should be used by agents (consistent with clause 41(d) of EIEP13C), while the other options available to consumers must satisfy the retailer's verification criteria. For example, a retailer may require the following (or similar):</p> <p>Phone call – require the caller to provide several points of verification; otherwise the request would be declined as invalid.</p> <p>Written request (most likely email) – require the requester to provide several points of verification; otherwise the request would be declined via return email with advice that the request is invalid until the required points of verification are provided.</p> <p>Via the retailer's web portal – would require a form to be completed, which satisfies several points of verification.</p>	<p>We have tidied up EIEP 13C in several ways and have redrafted sections of the procedures document to ensure they are consistent.</p>

Submitter	Submitter comment	Authority comment
	<p>Detail record – the retailer’s account number should be replaced with ‘Consumer no’, consistent with the EIEP4 protocol.</p>	<p>Agree. Drafting has been amended</p>
	<p>The procedure is silent on the requirement to provide estimated consumption. We do not see value in the retailer providing estimated consumption as a breakdown of the actual consumption between actual reads.</p>	<p>Requirements for estimated consumption have been clarified in the EIEP formats themselves.</p>
<p>Cortexo</p>	<p>We note that the code amendment 11.32F specifies that the Authority will publish procedures for responding to requests and currently those procedures are as listed in the reference document which we assume will be amended and clarified from time to time.</p>	<p>Yes. It will be initially published following our consideration of the feedback received through the recent consultation.</p>
	<p>To ensure that all parties respect the intent of the code Cortexo believes that more direction should be given with respect to Para 19 and 24 regarding validation of requestors (specifically consumers agents). We are concerned that arduous conditions could be placed on consumers agents. As one example, and we can think of many, a retailer might require signed written authority from the consumer authorising a particular agent. That would potentially lead to excessive time frames, well beyond the 5 business days contemplated, as the retailer can claim the request time window doesn't start until that validated request is received and processed, but from the consumers perspective the request was made when they asked the agent to act. This procedure would also negate the benefit of electronic processing by having an archaic manual authorisation mechanism.</p>	<p>We understand the point and acknowledge it as an important matter to resolve. Since retailers are responsible for the protection of consumer information under existing legislation, it is up to them to assure themselves of proper consumer and agent identity. At this stage, we will leave it to individual retailers to adapt their existing authentication processes to fit this new need. We expect that retailers will seek the most efficient processes possible that meet the need for proper authentication. We will monitor performance and be open to feedback from all parties as the parties engage and the new Code comes into effect</p>

Submitter	Submitter comment	Authority comment
	<p>Rule 11.32E refers to “otherwise properly authorised” agents, what constitutes properly authorised?</p> <p>We believe that the Retailer should accept, as a minimum, the same information that is indicated as mandatory in the EIEP13C file which would clearly identify the consumer and be information that could have only been reasonably provided by the consumer. We note that most retailers’ web sites only require similar information to open an account and commence a swap. We also note that the use of the EIEP hub requires a signed legal agreement between the Authority and the user, that agreement can and should warrant that every request made is on behalf of the legal owner of the data and that the requestor has the authority of the owner to make the request. [See our discussion on Consumer Authorisation codes in Q9]</p>	<p>in 2016.</p> <p>Following the above response, we recommend that potential agents and retailers engage now to discuss suitable protocols. We will monitor and be open to feedback.</p> <p>The agreement for the use of the registry hub is about the agents’ behaviour using the registry EIEP hub. It is more appropriate that a request made on behalf of the consumer is negotiated between the retailer and the consumer’s agent.</p>
Electric Kiwi	<p>We do not agree with 21(a) where a consumer must be able to request its consumption information by a phone call to the retailer. As the data will need to be sent to the consumer in electronic form, we believe that as long as the retailer provides an acceptable and timely method of communication for the request then this should be sufficient (e.g. email, instant messaging, text messaging).</p>	<p>Not all consumers will be practically able to request their summary consumption information (EIEP 13B) in ways other than by phone or posted mail. A posted paper response is an option the retailer will need to be able to provide. We agree that the likely large volume of detailed HHR data (EIEP 13A) is suited to only electronic transmittal methods. However, we would not expect a consumer to request such data unless they are willing and able to deal with a very large CSV file.</p>

Submitter	Submitter comment	Authority comment
emhTrade	We think the document has covered most of the issues that are unclear from a retailer's perspective. However we suggest that a more consumer friendly document could be made which is only 1 or 2 pages, giving a high level view on what the Code means for consumers.	We will be publishing additional guidance material that should assist consumers in requesting their consumption information.
Genesis	See marked up version attached.	Thank you for providing this. We have considered the marked up documents and have made a number of amendments throughout these that address the matters arising from your mark ups and from other submissions.
	<p>Also, it is clear that the procedure document as presented has been pulled together in a hurry and the author does not have the relevant understanding of operational realities.</p> <p>The Procedure is missing steps if a Retailer is unable to supply the data requested. We have supplied a suggested file format (EIEP13D) that could be returned to the agent in these cases.</p> <p>Our high level estimate of cost for implementing these procedures are in the region of \$200 to 300k rather than the \$50 top \$90k estimated by the Authority.</p>	<p>Having considered all submissions, we have amended all of the consultation documents to better focus and clarify the procedures and formats. Rather than create an additional format, a rejection reason capability has been added to EIEP 13A and EIEP 13B.</p> <p>Your 'high level' cost estimate is noted, the Authority expects that the benefits to consumers from this Code amendment will still outweigh the costs.</p>
Meridian	Meridian considers the guidance the procedures provide for determining	Having considered all submissions, we have

Submitter	Submitter comment	Authority comment
	<p>whether half hourly (HHR) or non- half hourly (NHH) information is required needs further clarification.³ 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>significantly amended all of the consultation documents to better focus and clarify the procedures and formats. In particular, EIEP 13B is refocused on summary consumption information as used in consumer billing, while EIEP 13A is suited to HHR information. The intent is to make consumers' consumption information freely and easily available to them and their agents, using standard formats. The scope of consumption information sought is the consumption information that is <i>available to the retailer</i>.</p>
	<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 needed to align with clause 12(1) of Electricity (Low Fixed Charge Tariff Option for Domestic Consumers) Regulations.</p>	<p>We understand the point but consider it is possible for retailers to comply with both requirements. We will consider this in any future revision of clauses 11.32A-F.</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>	<p>We disagree. We know of many consumers that would not be practically able to request their summary consumption information (EIEP 13B) in ways other than by phone or posted mail. A posted paper response is an option the retailer will need to be able to provide. We agree that the likely large volume of detailed HHR data (EIEP 13A) is</p>

³ Refer paragraphs 3-9 of the draft procedures.

Submitter	Submitter comment	Authority comment
		<p>suited to only electronic transmittal methods. However, we would not expect a consumer to request such data unless they are willing and able to deal with a very large CSV file.</p>
MRP	<p>EIEP 13A</p> <p>Requests for EIEP 13A should be limited to authorised agents accessing via the registry EIEP transfer hub. In our view, the only truly reliable and secure method for transfer of this information to agents is via the hub.</p>	<p>If the comment is that <u>only</u> agents should be able to request consumer information, then we disagree. Many consumers themselves are capable of dealing with EIEP 13A formatted HHR data and consider they should have access to this information. We have suggested that agent requests on consumers' behalves for EIEP 13A and EIEP 13B-formatted data be made through the EIEP hub.</p>
	<p>EIEP 13B</p> <p>EIEP 13B is intended to be summary information, in contrast to the detailed information in EIEP 13A. We assume that agents will always prefer and request the detailed EIEP 13A, so building processes to support the delivery of EIEP 13B to agents seems redundant. We suggest that requests for EIEP 13B be limited to consumers only.</p>	<p>We disagree. Agents will be potentially interested in both 13A and 13B information, as these formats are now clarified. For example, 13A might provide only HHR total consumption. A 13B formatted file would add contextual information (eg UN (uncontrolled) and CN (controlled) totals for a billing period) that is not available in the 13A file.</p>
	<p>To avoid confusion, the procedures should also be amended to state unambiguously that EIEP 13B only refers to NHH information. Currently, paragraph 34 (d) of Appendix C states that EIEP 13B only includes NHH</p>	<p>We have clarified that EIEP 13B applies to summary consumption information, as used</p>

Submitter	Submitter comment	Authority comment
	<p>consumption information, which is in line with the description of EIEP 13B in paragraph 3.3.1 of the Consultation Paper. However, this conflicts with paragraph 12 of Appendix E and paragraph 3.5.4 of the Consultation Paper which incorrectly state that EIEP 13B “must be the most detailed consumption information that the retailer holds in its systems or the information used to generate a customer’s invoice.” These paragraphs should be amended to provide that EIEP13B requires NHH information only.</p>	<p>in consumer billing.</p>
	<p>EIEP 13C Consistent with our view on EIEP 13A, only an agent should be the sending party for EIEP 13C.</p>	<p>Noted.</p>
Saveawatt	<p>A standardised process for requesting (EIEP 13C), presenting and distributing information to agents needs to be a requirement that all retailers accept. We do not want a situation where each retailer has differing processes and formats for releasing information.</p>	<p>The purpose of the Code amendment is to ensure consumers and agents have access to consumption information using standardised procedures, including data exchange formats.</p>
Trustpower	<p>The document appears to be designed primarily for agents, rather than consumers. It is not the optimal method of delivery for customers. Provision of this level of data directly to consumers will increase the volume of calls to retailers as consumers endeavour to turn this information into something useful for them.</p>	<p>We have sought to consider the needs of both consumers and their authorised agents. We have considered all submissions and amended the procedures and formats to focus and clarify them where necessary.</p>
	<p>Retailers acting as agents (via T&Cs) could request this data for every single switch. This would lead to an extremely high overhead in providing data files for</p>	<p>They might do if the consumer agrees but would need to be careful about what rights they might seek to include for themselves in</p>

Submitter	Submitter comment	Authority comment
	last two years' data.	retail T&Cs. Consumers may be happy that their new retailer gains access to their consumption history, especially if there is a benefit to them – eg if as a consequence they are offered the tariff most favourable to them based on their recent consumption history.
	The procedure is based on the premise of providing data to a single consumer at a single ICP (across multiple retailers). The procedure quickly becomes complex and unwieldy when multiple consumers have been at an ICP (with multiple retailers) during the requested period(s) – potentially under different names (if there have been multiple account holders within the same household). The consumer recorded by one retailer could vary from that recorded by another, increasing overhead to address this. There is further overhead and issues associated with identifying and confirming an agent's relationship to consumer.	EIEP 13A is a format for reporting consumption by a single consumer at one or more ICPs. EIEP 13B relates to the consumption information that is used in preparing a customer's bill. A request will be by or on behalf of a single consumer. Consumer identities and ICPs will need to be validated by the relevant retailer to ensure that only appropriate information is provided.
	Attempting to email a customer a file in a CSV format could be problematic, with the average 13A file being ~4Mb (there may be firewall and file-size limitations with some mail providers).	This may be an issue in some cases but we understand most email systems are generally able to handle attachments of this size. Zipping or compressing a file or an alternative to email could provide an alternative means of transmittal.
	It is possible that retailers are themselves not actually holding data at the HHR level when billing TOU-based time slots to a customer. The proposal will increase cost of service if service providers are asked to create and provide this	Under the Code, information must be made available at the request of the consumer if

Submitter	Submitter comment	Authority comment
	data to the agent or consumer.	<p>the retailer has used HHR data to:</p> <ul style="list-style-type: none"> a) calculate the amount of electricity consumed by the consumer at each ICP; or b) provide any service to the consumer.
	<p>In a case study completed in February 2015, the Privacy Commissioner concluded that usage information is personal information once it is associated with an account. The proposed formats clearly aim to link usage information with accounts and installations. In doing so, retailers become bound to protect the information as required under the Privacy Act. Trustpower, therefore, has serious concerns about the complexity and risks associated with verification and authorisation of access to information coming as a result of an electronic request i.e. EIEP 13C. Our strong preference is for consumers, or their agents, to self-authorise account access to data via a secure web portal or similar. This would shift responsibility for upholding privacy standards to the consumers themselves.</p>	<p>Retailers will need to develop efficient processes for authorising requests to ensure that only appropriate information is provided.</p>

Question 2: Do you have any comments on the draft EIEP 13A?**Related document: EIEP13A**

Submitter	Submitter comment	Authority comment
Contact	<p>Currently not all participants comply with 'Period of Availability for All Inclusive'. For example, 19 hours of availability for all inclusive metering is often shown as IN24 or IN5 instead of IN19.</p> <p>It may be useful for the Authority to resolve this.</p>	<p>There are current Code requirements for the correct use of register content codes and period of availability. Requirements have existed since 2004</p> <p>Point noted but this is a separate (wider) issue to the matter being considered. We note that the issue has been referred to the Standing Data Formats Group.</p>
	<p>Energy flow direction – Contact recommends this be amended to be L and G to align with registry codes rather than X and I; this also supports the example data file provided as part of Spec EIEP13B. The same logic should be applied to EIEP 1, 2 and 3 as the use of I and X can be confusing as evidenced by the suggestion to use 'Consumption' and 'Generation'.</p>	<p>We disagree. The codes X and I are used in all file transactions including EIEPs 1, 2 and 3, submission information and reconciliation information L and G are references to the attributes of an ICP, not metering information.</p>
	<p>Read status – Contact recommends that only permanent estimates be included as estimated data in these files. Accordingly, the specification should be amended to reflect this.</p>	<p>We disagree. Reads should be as used in the retailers' systems (including web portals) and the retailers' billing process.</p>
	<p>Consistency with other EIEP formats should be maintained wherever possible. Accordingly, 'Read Status' should be represented as either RD or ES.</p>	<p>Agree. We have amended the 13A and 13B formats accordingly.</p>
	<p>Date formats should also be made consistent. For example, EIEPs have date</p>	<p>Future time periods may not be half hour</p>

	formats as DD/MM/YYYY, whereas in this case the draft formats introduce additional complexity. It is noted that there is a field for trading period where HHR data is provided.	and/or align with trading periods. For flexibility, these fields need to be full DateTime formats.
	The ANZSIC code is available on the Registry and should be excluded from this file unless the purpose of its inclusion can be explained.	Agreed. This has been deleted from the format.
Cortexo	Future, consideration should be given to direct request/response methods of querying customer data (via API) for those that can support it; However, note our comments in Q10 on the use of the EIEP hub show that there is an auditing value in having a centralised post office type service as opposed to a direct API connection as we suggest above	Point noted.
	Confirmation would be helpful in the second bullet point of item 4 to the effect of "date range cover data from the days 1st May to 4th May (excluding 5th)"	Agreed. We have amended EIEP 13A to clarify the example.
Electric Kiwi	While we support the majority of the proposed format for the draft EIEP 13A, it is our view that the "Read Status" field for each trading period is not useful. For HHR consumption data, in most cases only a small number of trading periods will have been estimated over a longer time frame so having this portion of estimated data is not going to materially alter the analysis outcome for the customer. The EIEP 13A file would also not specify the estimation method used, so there is no way for the customer and/or their agent to determine whether the estimate was appropriate. An alternative may be to supply the percentage of actual data in the file as a percentage in the header field.	We understand the point being made but consider that the field is particularly relevant for NHH (eg monthly) data. Parties receiving the formatted files will need to decide what fields are of use to them.
emhTrade	Whilst it is prudent for participants and other parties to keep accurate records of customer authorisation, this record keeping will likely be done independently by the sending and receiving party (in the case of a customer receiving, it is unlikely to be done). Thus we don't think the field 'Customer Authorisation Code'	The field is conditional and only needs to be used if a code has been agreed. If it has not been agreed it may be left blank

	needs to be transmitted in the file. The fact that there is a unique file number in the header will allow parties to link the data transmitted to an authorisation in their own systems for record keeping purposes. This field should be optional or omitted.	We acknowledge that authorisation will be done in different ways by different retailers. Including the field in a DET row is a consequence of the 13A format's ability to contain multiple ICPs in a single file.
Genesis	See marked up version attached. Also: The line per consumption period format as defined creates a file of 35,040 rows (48 x 365 x 2) per register. The majority of ICPs have 2 registers, so the file will be 70,040 lines.	While we appreciate the data file may be large, this is not an issue for the format itself.
	3.4.1 (f) "...consumption information that the retailer holds in its system." Not all retailers will necessarily hold ½ hour data in their own systems. So this requirement needs to be re-phased to capture all data available to the retailer.	If you have used the information for a service or within your own systems you must provide it.
	3.4.3 Data protection need only refer to Privacy Act compliance, not define the action. Also needs to allow for retailer web portal supply of file.	Paragraph 3.4.3 addresses use of the EIEP hub, not Privacy act issues.
	3.4.5 Delete reference to "...or consumers agent..." as agent should only request information via the EIEP hub.	We have no objection to an agent requesting a consumer's information by email.
	3.4.6 Remove words "...by email..." However data is received by the customer, the customer can pass on the data to others.	Agreed.
Meridian	As mentioned in our attached cover letter, 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	The procedures document has been modified to delete the use of the word "certified". EIEP13A requires the provision of

	<p>provide non-certified information⁴, 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 (and use for billing purposes) 'element level' rather than the detailed 'register level' 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>the most granular information used by the retailer, and EIEP13B requires the provision of billing information.</p> <p>Any differences between information received by the retailer and invoice volumes would be a valid reason for a consumer to challenge their invoice. The most likely reason would be the use of estimated information in invoicing, and the reading should be noted as estimated in EIEP13B.</p> <p>While HHR data may be available from the MEP, if the retailer had not used it in providing a service to (eg website), or billing their consumer, it would not need to make it available in EIEP13A</p>
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⁴ 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.

	We question whether the ANZSIC code field is necessary.	We agree that this field is unnecessary and have deleted it from the 13A format.
MRP	See our response to Question 1	Noted.
Saveawatt	The manner in which electronic information is transferred should be chosen by the consumer or consumer’s agent. A preference should be for EIEP hub over email.	Agreed. An agent must specify its preference of transmittal options within the 13C request file, using the field provided for that purpose.
	The information an agent may receive should be made available on a bulk basis – i.e. CSV file containing multiple customers as requested by an agent rather than singular CSV files for each customer.	Agreed.
	What is the criteria of confirming a consumer’s agent is qualified to gain access to the EIEP hub and seek the information from the retailer?	<p>The Authority will provide agents access to the EIEP hub.</p> <p>It will be up to individual retailers to use their own verification processes as they will be accountable for security and privacy concerns regarding information they hold on their customers. The Authority expects these processes should not be onerous and will monitor to assure that verification of identity and authorisation is not an unreasonable barrier to consumption information access.</p>

	<p>If an agent has been granted access to the EIEP hub is this sufficient for the retailer to accept the agent is authorised by the customer? If not is there a standardised electronic process to confirm an agent’s authority for every customer they act for? If yes what information is required?</p>	<p>It will be up to individual retailers to use their own verification processes. See last response.</p> <p>The agreement for the use of the registry hub is about the agents’ behaviour using the registry EIEP hub. It is more appropriate that a request that is made on behalf of the customer is negotiated between the retailer and the consumer’s agent. Retailers will need to develop efficient processes for authorising requests to ensure that only appropriate information is provided.</p>
Trustpower	<p>The repeating nature of data results in a file being created that is larger than needed. Attempting to email a customer a file in a CSV format could result in issues, with the average 13A file being ~4Mb (there may be firewall and file-size limitations with some mail providers).</p>	<p>The file size concerns have been considered and it is accepted that 2 years of HHR data will be a large file. 4 MB attachments should not be an issue for most email systems. Zipping or compressing a file would also be acceptable.</p>
	<p>Security to meet privacy concerns could add significant additional overhead and complexity to the process for both retailer and consumer. Examples such as marriage separations, or the split of flatmates are good examples of where ICP, address, and account information needs additional verification steps to entitle data access.</p>	<p>Point noted, however retailers already routinely deal with such issues so the overhead and complexity referred to is not entirely incremental.</p>
	<p>The process is clearly designed for industry use (retailers and agents). Transforming this data into useful information by a consumer is not a simple matter.</p>	<p>Noted.</p>

Question 3: Do you consider there are alternatives to an EIEP 13A? Please give reasons for the alternatives.**Related document: EIEP 13A**

Submitter	Submitter comment	Authority comment
Contact	No.	Noted.
Cortexo	No need to seek alternatives as the suggested format meets the need. Cortexo is not aware of any existing formats or protocols that are suitable for fulfilling this purpose.	Noted.
Electric Kiwi	No. The purpose of an EIEP 13A is to allow for a customer's agent, or a customer who wishes to use their own analysis tools, to obtain their previous consumption data in order to determine the best value plan on offer in the market. As a number of innovative products which are currently on the market require this detailed half-hourly data to make this assessment, we believe it is in the best interests of the consumer to have this data available.	Noted.
emhTrade	An alternative would be to have a file explicitly for Trading Period Data. This might make the file more machine readable, particularly with regards to the treatment of daylight savings adjustments. We think the proposed approach of one file has benefits that are worth perusing though so agree with proposed methodology.	Noted.
Genesis	Change the defined format to be a default format to be used only if an alternative format is not agreed between parties. By limiting to only a single format, the Authority is limiting innovation in intermediary businesses that may develop on different data requirements.	The format applies to consumer requests made in accordance with clause 11.32A-F of the Code.

Meridian	<p>Unsure.</p> <p>Meridian has noted the Authority's suggestion that international formats would be prohibitively costly to adopt⁵ 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>	Noted.
MRP	(BLANK)	-
Saveawatt	(BLANK)	-
Trustpower	<p>Yes. Retailers' portals and websites, which allow for self-service, are likely to be a better option.</p>	<p>This would require standardisation of the output of web portals and web sites, and could limit the innovation that a retailer may wish to provide.</p> <p>If existing options meet consumer and agent needs, we would not expect a consumer or agent would seek to use the Code process. The issue the Code amendment addresses is that retailers have not consistently met consumer/agent needs around access to consumption information.</p>
	<p>Trustpower would view an appropriate solution to be where consumers authenticate themselves into an environment using their secure login credentials and download their personal usage information.</p>	<p>Noted. The new Code provisions represent a minimum standard for access to consumption information and do not preclude</p>

⁵ Discussed in paragraph 3.1.3 of the consultation paper.

	<p>In the same way, consumers could authorise agents to access consumption information on their behalf by choosing to share secure login credentials with trusted agents. Alternatively, if the only way consumers were able to authorise agents' access to their consumption data was through the retailer's secure environment, this would allay concerns regarding privacy and the cost of having to validate agents' requests for data.</p>	<p>web-based request/authentication/delivery solutions.</p> <p>An authorisation code is also included in EIEP13C for this purpose.</p>
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Question 4: Do you have any comments on the proposed EIEP 13B? Please give reasons and discussion where you disagree.**Related document: EIEP13B**

Submitter	Submitter comment	Authority comment
Contact	<p>Clause 34 states the file “includes only NHH consumption information”, yet Appendix E provides for more granular data – for example, hourly, half hourly, sub-half hourly, and trading periods, this creates confusion and should be clarified.</p>	<p>We acknowledge the discrepancy between the procedures paper and the EIEP 13B format document. Having considered all feedback received on this point, we have decided to revert EIEP 13B to a NHH summary consumption format only (that should align with customer billing information). This simplifies and focuses the format. Consequential amendments have been made throughout the EIEP 13B format.</p>
	<p>The order for header record types and detail record type is inconsistent in places – for example, the header record types have column 5 as ‘Tariff name’ followed by ‘Read period start’, whereas the detail record type has ‘Period of availability’ followed by ‘Read period start date and time’.</p>	<p>Agreed. We have amended the format to resolve the anomalies identified. We have also checked the example outputs provided at the end of EIEP 13B and made these consistent with the specified format.</p>
	<p>There is an inconsistency between EIEP13A and EIEP13B for the detail record type for ‘Unit quantity reactive energy volume’ – both should be ‘C’ as per EIEP13A.</p>	<p>Agreed. We have amended the 13B format to make it consistent.</p>
	<p>The sample MS Excel file implies only A (actual) reads, whereas ‘Read status’ includes A (actual) and E (estimated) reads in both EIEP13A and EIEP13B. It would be useful if the Authority could please clarify what is intended?</p>	<p>The sample output is only an example. We have added a few rows of estimates to clarify as requested.</p>

	<p>Energy flow direction – Contact recommends this be amended to be L and G to align with registry codes rather than X and I.</p>	<p>We disagree. The codes X and I are used in all file transactions including EIEPs 1, 2, 3, submission information and reconciliation information L and G are references to the attributes of an ICP, not metering information.</p>
	<p>Read status – Contact has recommended that only permanent estimates should be included. Accordingly, the specification should be amended to reflect this.</p>	<p>We disagree. Reads should be as used in the billing process. The sample output is only an example. We have added a few rows of estimates to clarify as requested.</p>
	<p>Tariff name – Contact questions the value of this field. As this file appears to be free text (CHAR50) there will be inconsistencies in the population of this field between retailers. If there is not going to be a standard naming convention then this field should be excluded and the recipient should refer to the combination of register content code / period of availability to determine likely pricing options suitable.</p>	<p>The intent of this field is to provide a customer friendly name for the tariff option that aligns with the retailers tariff description in their offer to the customer. We acknowledge that tariff names will vary between retailers, even for what is effectively the same tariff option. It should be assigned by the retailer to align with terminology the retailer has used in its price schedule.</p>
<p>Cortexo</p>	<p>We are confused about the electronic requesting of EIEP13B formatted data. Para 37 states that a consumer's agent can request data using the EIEP hub but Para 41 says EIEP13C: (e) allows the consumer's agent to request either EIEP 13A. [nothing else, was "or EIEP 13B" supposed to be here?]. Further, Appendix F "EIEP 13C: Request File for EIEP 13A" specifically says, both in its title and in the "Description of when this protocol applies" that the format is only for requesting EIEP13A data; so what format is used in the EIEP hub for requesting EIEP13B data?</p>	<p>As now amended, both EIEP 13A and EIEP 13B will be of use to a consumer's agent in analysing the consumer's usage profile. Accordingly, we have amended EIEP 13C to enable consumer agents to request either EIEP 13A or EIEP 13B formatted information (or both, if two requests are made), transmitted via the EIEP hub or by email at</p>

	<p>One would assume that if you requested EIEP13B data via the hub then you would receive the data electronically but Para 26 seems to indicate the provision of electronic data in EIEP13B format is optional as one of three either/or choices.</p>	<p>the agent's discretion.</p>
	<p>In Appendix E, Business Requirement 12 references the data being provided as "the information that was used to generate the customer's invoice", we assume that this is only consumption data and not the fixed and variable tariff rates as well (which would lead to richer and more meaningful data)</p>	<p>Correct. The Code amendment specifically related to consumption information, which is variable in nature. Fixed charges, such as daily charges, are provided in the retailer's tariff description. Other variable consumption charges, such as the Electricity Authority levy, can be calculated from the consumption information provided. We have clarified the clause 11.32F procedure detail in the procedures document.</p>
<p>Electric Kiwi</p>	<p>We do not agree with clause 3.5.2(b) in that EIEP 13B should apply where the consumer asks for the information to be provided in printed form. We do not believe that having this information in printed form is of any use to the consumer due to the detailed nature of the file format.</p> <p>It is our view that if the information is available to be downloaded from the retailer's web portal (per clause 3.5.2(a)) then the customer can print as required.</p> <p>We would also like to add that when a customer has HHR volume information, it is the total consumption at the ICP which is most relevant, hence the data format for EIEP 13B is likely to be too detailed to be useful to the customer. One exception is where the meter records import and export consumption data, in which case we support separating the data.</p>	<p>We have reviewed the scope of EIEP 13B and have decided to exclude detailed HHR data from it. This will make it a summary NHH consumption information format only. If a consumer wants HHR data (and it is available to the retailer), this will be available using the EIEP 13A format. The likely large volume of this information will practically require an electronic means of receiving and making use of this data (eg email receipt of a CSV formatted file that could be a few megabytes in size and then import into a spreadsheet such as Microsoft Excel for analysis, manipulation, and/or charting.</p>

emhTrade	We agree with the proposed format and commend the approach taken to ensure that the file is easily readable using consumer level tools such as Excel.	Noted.
Genesis	See marked up version attached.	Noted and incorporated changes where appropriate.
	Also: 3.5.1 (d) Needs to clearly state data included is billed data only. Including half hour data that has not been billed misses the whole point of EIEP13B being a customer centric summary file.	We have reviewed the scope of EIEP 13B and have decided to exclude detailed HHR data from it. This will make it a summary consumption information format only.
	3.5.3 (a) (ii) Posting paper copy if output includes half hour billed data is not realistic. – At 60 lines per A4 page, 70,080 rows will require 584 pages (i.e. more than a ream of paper) if double sided.	Agreed. Reverting EIEP 13B to NHH summary information should allay this concern.
	3.5.3 (b) (ii) Data protection need only refer to Privacy Act compliance, not define the action.	Agree that data exchange security is adequately addressed elsewhere. Note that paragraph 3.5.3 is in the consultation paper. The equivalent paragraph 35 in the procedures document is appropriately drafted.
	3.5.3 (b) (iii) delete, agent interaction only by EIEP hub.	We disagree. The response format is at the discretion of the requester.
	3.5.4 Delete. The author has missed the point of the purpose of the customer summary format. Reference is to billed data not what is held in the system	Agreed. Reverting EIEP 13B to NHH summary information should allay this

	(which is covered in EIEP13A).	concern.
	3.5.5 (c) Paper copies only work if billed data is supplied.	Agreed. Reverting EIEP 13B to NHH summary information should allay this concern.
	3.5.7 remove reference to "...or the consumer's agent" as all agent transactions must be via EIEP hub.	We disagree. The response format is at the discretion of the requester.
Meridian	It is Meridian's understanding that the EIEP 13B format differs from EIEP 13A 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).	Agreed. Reverting EIEP 13B to NHH summary information should allay this concern.
	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.	The intent of this field is to provide a customer friendly name for the tariff option. We acknowledge that tariff names will vary between retailers, even for what is effectively the same tariff option. It should be assigned by the retailer to align with terminology the retailer has used in its price schedule.
	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.	Retailers must provide the most granular information they have used in their systems in EIEP13A and invoicing information in EIEP13B.
MRP	See our response to Question 1.	Noted

Saveawatt	(BLANK)	-
Trustpower	As with 13A – we have the same overhead and privacy management concerns.	Noted. Responses provided under Q1.
	Further, we believe there is enough variation between various retailers' definitions of control periods to create confusion for customers trying to compare or model their usage. As an example, the hours to which a day and night content code applies could vary between retailers. This summary format does not adequately address these challenges and may require further definition	These differences will be explained in other retailer documentation. We accept that an analyst will need to consider matters in addition to the information provided in EIEP 13A and 13B consumption files.
	In a general sense, aggregate information as described in 13B is likely to be a more useful and better understood data set for consumers.	Noted.

Question 5: Do you consider there are alternatives to an EIEP 13B? Please give reasons for the alternatives.**Related document: EIEP13B**

Submitter	Submitter comment	Authority comment
Contact	It would seem that there should be one file format for HHR data, and another for NHH data. If a requester wants only NHH data, they should be able to request and receive only NHH data.	Reverting EIEP 13B to NHH summary information should allay this concern.
Cortexo	No. Cortexo is not aware of any existing formats or protocols that are suitable for fulfilling this purpose	Noted.
Electric Kiwi	An alternative could be that for the two years subsequent to a customer having an account with a specific retailer, they must be able to log into that retailer's web portal and retrieve their consumption information via the web portal.	A retailer could choose to do this but with alternatives available, we do not consider it appropriate to enforce this.
emhTrade	Not applicable.	-
Genesis	Change the defined format to be a default format to be used only if alternative format is not agreed between parties. By limiting to only a single format, the Authority is limiting innovation in intermediary businesses that may develop but on different data requirements.	This standard formats are a minimum requirement for retailers to provider this information to consumers or their agents.
	Also, the current format may limit innovative pricing by retailers.	We note that formats can be updated to accommodate new pricing architectures as required.
Meridian	As the Authority's proposals recognise, retailers could provide the information themselves. We consider it is important retailers retain the ability to offer	Noted.

	<p>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>	
MRP	(BLANK)	-
Saveawatt	(BLANK)	-
Trustpower	Yes. As discussed above, customer invoices and retailers' secure websites and portals.	Noted.

Question 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?

Related document: EIEP13B

Submitter	Submitter comment	Authority comment
Contact	<p>All mass market customers with an AMS/ARC smart meter can access their HHR data via our portal currently. In due course we anticipate all consumers with smart meters will be able to access their HHR data.</p> <p>Mass market customers who request consumption data are provided with consumption data between actual reads.</p> <p>Commercial and Industrial (C&I) customers who request consumption data are provided with HHR data. C&I customers can also subscribe to a service to access their HHR data online.</p> <p>The content provided by Contact is not in the format specified for EIEP13B; however it is considered that the information provided meets the purpose for which summary consumption information is intended.</p>	Noted.
Cortexo	<p>Yes, the Cortexo energy portal displays both HHR and NHR information in a variety of online graphs including options to download that data into CSV files. This service includes all information in EIEP13 A & B formats</p>	Noted.
Electric Kiwi	<p>Electric Kiwi currently provide customers with historical half-hourly consumption data for each ICP linked to their account in chart form. As we have not received any customer requests to do so, a download functionality is not currently in place, however it would be simple to implement this function in order to export the data to a .csv file.</p> <p>Although the information is recorded in our system, we do not show the meter serial number, register content code, period of availability or reactive energy</p>	Noted.

	kVArh as required by EIEP 13B because only the total active energy consumption per ICP is relevant to our residential customers.	
emhTrade	No.	Noted.
Genesis	<p>Yes.</p> <p>The vast majority of direct requests from customers are for a transaction history (what have I been billed and what have I paid). Very few requests for consumption data are received.</p> <p>Consumption data can be self-accesses from the Genesis Energy web portal at monthly, weekly, daily or ½ hourly periods, depending on customer choice.</p>	Noted.
Meridian	<p>While not available to download, Meridian provides its ‘MyMeridian’ residential customers the option of viewing their consumption information. Most of our other non account managed NHH customers will also have this access in June. Many of our account managed NHH customers will likely have this access by around August. 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>[confidential material 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.</p>	Noted.

	RCC/POA) as it is aggregated to a meter level rather than register level.	
MRP	We provide granular consumption data to our customers through: GEM – Mercury’s Good Energy Monitor which allows customers a readily available and free download service of their electricity consumption data through our Globug and Bosco websites.	Noted.
Saveawatt	(BLANK)	
Trustpower	Yes. The customer’s invoice, and information also provided on the website. This includes all the key information required to allow a customer to analyse the summarised information.	Noted.

Question 7: Do you agree that an EIEP 13C is required? Please give reasons and discussion where you disagree or consider there are alternatives.

Related document: EIEP13C

Submitter	Submitter comment	Authority comment
Contact	<p>Yes, and we consider it should be the only format for agent requests.</p> <p>This file should also have an optional return path back to the requestor to allow retailers to advise whether a request has been accepted or rejected (and, if so, what additional information is required).</p> <p>The Glossary of Terms should include a definition of consumer to clarify that the consumer is linked to the ICP.</p>	<p>Noted.</p> <p>Point noted. Genesis has also made this suggestion and has provided a draft EIEP 13D, designed for this purpose. We agree an electronic rejection method is desirable and have provided additional functionality in 13A and 13B to provide for this.</p> <p>Consumer has been added to the glossary on each of the relevant EIEPs</p>
Cortexo	<p>Yes the EIEP13C format will make for a smooth and efficient exchange of information between retailers and customers agents who have automatic services available.</p>	Noted.
	<p>As the data access rules and processes mature, the EIEP13C format will be a good foundation for more regular requests such as daily data files for ICP's (instead of 4 files a year per ICP).</p>	Point noted, however this is beyond the current scope.
	<p>We also note "Consumer name": char 6 is rather short!</p>	Agreed. We have amended the format to provide a practical field width.
Electric Kiwi	<p>We support the implementation of EIEP 13C as we believe that a standardised method of requesting historical consumption data via EIEP 13A will ensure more</p>	Noted.

	timely and complete delivery of information to customers and/or their agents.	
emhTrade	Yes, the 13C will streamline the process by ensuring that retailers can automate the receiving and processing of requests. In fact, without an automated request process, most of the benefits of the Code change would be unrealised.	Noted.
Genesis	Yes. To achieve any sense of operational efficiency, all interactions with agents need to be codified and consistent (from experience, a large numbers of customer requests are not expected) Also see marked version attached.	Noted.
Meridian	Unsure, but potentially yes.	Noted.
MRP	Yes. EIEP 13C should only be utilised via the EIEP hub and Appendix F should be amended accordingly.	Noted.
Saveawatt	Agree	Noted.
Trustpower	For agents, yes. However we believe there are superior alternatives that reduce the costs of validation of requests for retailers. For example, if a consumer is only able to authorise access by his/her agent through the retailer's secure online environment, costs to the retailer to validate that request will be minimal. For consumers, the EIEP 13C is not really a valid option for most. In its current form, and understanding that the format is likely to be used primarily by agents and requires a higher degree of validation, Trustpower believes that retailers should be able to pass on reflective costs to those agents for a data provision service of this form. This would also help with the	Noted. Noted. View noted but costs have previously been addressed in developing the Code amendment and are not in scope for this

	establishment and uptake of lower cost channels such as consumer portals.	consultation.
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Question 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.

Related document: EIEP13C

Submitter	Submitter comment	Authority comment
Contact	Yes.	Noted.
Cortexo	<p>One of the main purposes of the Retail Data Project is to encourage innovation. Innovation from 3rd party service providers will occur more rapidly because of electronic exchange of data. Without this mechanism the exchange of data can easily be subject to error and slow administrative process or even deliberate hindrance. It could also be more expensive for a retailer dealing with a large number of requests from agents if there was not an electronic process.</p> <p>The EIEP13C contains enough information (excluding any consumer authorisation code) for the retailer to validate the request after it is received from the EIEP transfer hub. Given that access to the EIEP transfer hub will need to be approved by the Authority and the user assigned an access code and sign an access agreement, sufficient legal weight can be put on the requirement to warrant that every request made is on behalf of the legal owner of the data and that the requestor has the authority of the owner to make the request.</p> <p>Requiring the EIEP13C to be "pre-authorised" by the retailer will add more barriers to entry for authorised requesters. See our comments below on Consumer Authorisation Codes.</p>	Noted.
Electric Kiwi	Yes.	Noted.
emhTrade	Yes, as above, the benefits of the project will not be realised without this. The Authority is correct to leave the method of authorisation verification to the parties	Noted.

	involved. There are significant advances being made in online identity and verifications and the EIEP framework should be flexible enough to incorporate these changes as parties innovate and adapt over time.	
Genesis	<p>For all agent interactions only electronic requests and data files can be used. The only transmission method is via the EIEP hub.</p> <p>Authorisations should be handled as a commercial arrangement between retailer and prospective agent. E.g. Agent signs agreement with retailer that specifies that Agent will hold authorisation for every request sent. Agent is subject to audit by retailer to ensure compliance.</p> <p>Current authorisation processes which requires individual customers to contact Genesis Energy to advise of an authority's details will not work in the proposed model of interactions.</p>	<p>EIEP 13C provides for the requesting agent to specify the transmittal method, selectable between hub and email.</p> <p>Noted.</p> <p>Noted.</p>
Meridian	See response to Q1 above.	Noted.
MRP	We agree that an electronic request form should be provided to allow machine to machine requests. However, agents rather than retailers ought to verify a consumer's request and then confirm that authorisation to retailers (in the manner required by retailers) when making a request for information.	Noted.
Saveawatt	Agree – but how does the agent confirm they are authorised to seek information on behalf of the customer. A standardised electronic process accepted across all retailers needs to be adopted.	Noted. Retailers will have to implement a process to assure that an agent is properly authorised as they have Privacy Act responsibilities in respect of the information they hold about their customers.

<p>Trustpower</p>	<p>Any request should provide adequate information to validate the consumer's request. This presents some privacy concerns as to how to validate that the electronic request is from a valid consumer or agent, or that the agent genuinely has the consumer's consent, unless previously identified in the receiving system.</p> <p>As discussed above, if the consumer were required to log in to the retailer's secure environment to download data and enable access to their agent, this would minimise validation costs. An even cheaper solution would be to require consumers to provide the data to the agents themselves (and forbid third-party access).</p>	<p>Noted. Retailers will have to implement a process to assure that an agent is properly authorised as they have Privacy Act responsibilities in respect of the information they hold about their customers.</p>
	<p>Any request should have at least the period the data is being requested for. The current proposed 13C has no start and end period for the request.</p>	<p>It is assumed in all cases that the period of the request is for the maximum period required under clause 11.32B(1) of the Code.</p>

Question 9: Do you agree with the use of a Consumer Authorisation code in EIEP 13C? If you disagree please give reasons.

Related document: EIEP 13C

Submitter	Submitter comment	Authority comment
Contact	<p>Contact disagrees with this approach. In order to meet our privacy requirements, Contact requires several points of customer verification when a customer calls into our call centre or sends an email.</p> <p>Contact does not believe that the use of a single consumer authorisation code is sufficient to meet our privacy obligations in confirming customer/consumer identity as part of this process.</p>	<p>Retailers will need to develop efficient processes for authorising requests to ensure that only appropriate information is provided .</p>
Cortexo	<p>Cortexo does not agree with the use of a consumer authentication code in this context because:</p> <ul style="list-style-type: none"> • this document does not define sufficiently the way this is obtained or used; • it could be used by the retailer to hinder or delay a request via an agent; • from the consumers perspective it could make the requesting process more complicated (via a 3rd party) and therefore could become another barrier to accessing data. This defeats the intent of the access to consumer data project • it seems to have a dual purpose • security authentication of an agent requesting data on a consumer's behalf, and/or • a auditing field that holds “time and boundary” (unsure what that means) information to ensure the correct data is released 	<p>The consumer authentication code is a conditional field that must only be sued if it is agreed between the retailer and the agent.</p>

<p>Electric Kiwi</p>	<p>Yes, this would allow for previous requests to be easily retrieved in retailer's back office systems, again ensuring more timely delivery of information to customers and/or their agents.</p>	<p>Noted.</p>
<p>emhTrade</p>	<p>As above, we agree that this field should be provided, and that it should be left to the relevant parties to agree what value they will use (if anything) to populate it.</p> <p>However, given that there is the option for the authorisation code, we think the following changes should be made to the file. The reasons for these changes are three-fold:</p> <p>Privacy best practice stipulates that information that identifies an individual (such as names and addresses) should not be transmitted unless absolutely necessary.</p> <p>Some fields proposed will only be held by a retailer. By having these fields as mandatory, the EIEP 13C will not be able to be used by other parties in future (for instance, we think it likely that energy services providers (ESPs) may request data from each other rather than from retailers). It would be inefficient to have to develop a different (non-standard) request file for these cases.</p> <p>By having the optional Authorisation Code, parties may use whatever methodologies they develop to verify authorisation, in which case many fields will be redundant.</p> <p>The following fields should be changed from M (mandatory) to C (conditional, Null or mandatory where Consumer Authorisation Code is Null):</p> <p>Consumer name</p> <p>Retailer's account number</p> <p>There is an argument to saying they should be optional, but presumably the</p>	<p>Noted.</p>

	<p>retailer will need these at a minimum if no Cust Auth code is present.</p> <p>The following fields should be removed altogether or at the very least, made optional (since they contain identifying data which are contained in other data fields)</p> <p>Customer name -- duplicates consumer name.</p> <p>All postal address fields -- All physical address information can be mapped from the ICP number. Invoice address information may not be held in the case of ESP to ESP requests, and doesn't seem necessary regardless.</p>	
Genesis	No, it will be of more use to stipulate a request identifier to enable the agent to align a request to data received. ICP number alone is insufficient as the agent may be acting for multiple customers on the same ICP.	Agree. The "unique request identifier" in EIEP13A and 13B has been referenced to the identifier provided in EIEP13C
Meridian	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.	Noted.
MRP	<p>We do not understand the purpose of the Consumer Authorisation code. In our view it is not required to assist retailers in managing their customer information.</p> <p>The Consumer Authorisation code must not be taken to replace the process of authenticating agent authorisations. There would be serious risks for all parties in substituting the code for the authorisation process.</p>	Noted.
Saveawatt	Agree as long as the code will be easily obtainable by the agent.	Noted.
Trustpower	There is complexity around storage of this code and how the information should be handled for overlapping requests (for example should the code be stored at	Noted.

	<p>consumer level or data level?).</p> <p>A data-level storage of this code means a more complex data management system build to support this process.</p> <p>It is unclear how it is proposed that the consumer authorisation code is lodged with the retailer without some other interaction during which sufficient validation and authorisation would need to take place.</p>	
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Question 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.

Related document: EIEP13A and 13C

Submitter	Submitter comment	Authority comment
Contact	Yes.	Noted.
Cortexo	<p>Yes we agree, the main benefit is that there is one access point for all retailers and agents to request and receive data, reducing complexity and cost. We also see that the hub will provide a good auditing platform for the Authority to assess the timeliness of responses and volume of requests using this method.</p> <p>A future thought maybe that all requests for meter data go through the hub, i.e. written, phone and email requests could be entered into a form at the retailers call center that created and sent an EIEP13C via the hub. This would provide the Authority with a means by which they could assess and maintain performance standards of customer data requests. This comment is just raising a point for discussion at some future time, not something Cortexo is actively advocating.</p>	Noted.
Electric Kiwi	Yes.	Noted.
emhTrade	Yes, we think this is a great opportunity to leverage the existing resources and capabilities of the industry.	Noted.
Genesis	As far as agent interactions go, for this model to work, the EIEP hub can be the only mechanism. All EIEPs (13A, B, or C) can be transmitted as agent may not require full ½ hour data set for offering to customer.	Noted.

Meridian	Yes.	Noted.
MRP	The registry EIEP transfer hub should be the <u>only</u> transfer mechanism for EIEP 13A and 13C for agents for the reasons discussed above. For consumers, 13A and 13B should only be accessible via electronic means (including the Retailers portal where possible).	Noted.
Saveawatt	Agree	Noted.
Trustpower	For agents this is a valid option. However, the number of agent codes and overhead for getting codes created for every agent or person that wishes to use this option may be excessive.	Noted.