

8 May 2015

## Retail Data Project EIEP Specifications

Thank you for the opportunity to contribute to what we consider to be the Authority work stream with the greatest potential to change consumer's lives over the coming years.

We commend the work done to date, and look forward to the new innovations in customer insight that energy services providers will be able to offer following the implementation of the Code changes.

Overall, we think the guidelines and file formats have been thoughtfully developed and have clearly included feedback to date from participants and technical group members.

We do feel there are still a couple of tweaks that should be made in order to ensure that these standards are future proof, and bring the maximum benefit to consumers. We outline these in our detailed comments below.

Please do not hesitate to contact me if you have any queries in regards to this feedback.

Yours Faithfully,

Stuart Innes.

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

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.

*Do you have any comments on the draft EIEP 13A?*

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' 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.

*Do you consider there are alternatives to an EIEP 13A? Please give reasons.*

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.

*Do you have any comments on the proposed EIEP 13B? Please give reasons and discussion where you disagree.*

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.

*Do you consider there are alternatives to an EIEP 13B? Please give reasons for the alternatives.*

NA

*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?*

No

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

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.

*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.*

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 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.

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

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.

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:

1. Privacy best practice stipulates that information that identifies an individual (such as names and addresses) should not be transmitted unless absolutely necessary.
2. 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.
3. By having the optional Authorisation Code, parties may use whatever methodologies they develop to verify authorisation, in which case many fields will be redundant.

The following fields should be changed from M (mandatory) to C (conditional, Null or mandatory where Consumer Authorisation Code is Null):

**Consumer name**

**Retailer's account number**

There is an argument to saying they should be optional, but presumably the retailer will need these at a minimum if no Cust Auth code is present.

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)

**Customer name** -- duplicates consumer name.

**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.

*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, we think this is a great opportunity to leverage the existing resources and capabilities of the industry.