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12 May 2015

Submissions  
Electricity Authority  
PO Box 10041  
Wellington 6143

## Consultation – Retail Data Project: Access to consumption data formats and process document

Dear Sir/Madam,

Electric Kiwi welcomes the opportunity to provide feedback to the Electricity Authority on the issues raised and initiatives proposed in the Retail Data Project consultation paper.

For any questions related to this submission, please contact:

Huia Burt

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## Appendix A: Submission

**Submitter:** Electric Kiwi Limited

Question No.	Related document	Question	Response
Q1	Procedures	Do you have any comments on the draft procedure document for the exchange of consumer consumption information?	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).
Q2	EIEP13A	Do you have any comments on the draft EIEP 13A?	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.
Q3	EIEP 13A	Do you consider there are alternatives to an EIEP 13A? Please give reasons for the alternatives.	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.

Q4	EIEP13B	Do you have any comments on the proposed EIEP 13B? Please give reasons and discussion where you disagree.	<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>
Q5	EIEP13B	Do you consider there are alternatives to an EIEP 13B? Please give reasons for the alternatives.	<p>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.</p>
Q6	EIEP13B	Do you currently have a method for providing a consumer consumption information? If yes, what is the method and does it include the information that is in EIEP 13B?	<p>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 kVArh as required by EIEP 13B because only the total active energy consumption per ICP is relevant to our residential customers.</p>

Q7	EIEP13C	Do you agree that an EIEP 13C is required? Please give reasons and discussion where you disagree or consider there are alternatives.	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 timely and complete delivery of information to customers and/or their agents.
Q8	EIEP13C	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.
Q9	EIEP 13C	Do you agree with the use of a Consumer Authorisation code in EIEP 13C? If you disagree please give reasons.	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.
Q10	EIEP13A and 13C	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.