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Electricity Authority
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(by email to submissions@ea.govt.nz)

Submission on Retail Data Project: Access to consumption data Formats & Process

Please find attached Cortexo's response to the above Consultation Paper dated 28 APRIL 2015.

Cortexo appreciates the opportunity to provide input into this process. We have participated in the previous consultations, read all the responses and we were part of the working group on the data formats.

We fully support the Authority with regard to this project and believe that the outcomes will be increased competition and innovation in the electricity market that will directly benefit consumers.

Yours faithfully,

Terry Paddy
Managing Director

Appendix B: Questions and format for submissions

Submitter: Cortexo Limited

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

Q4	EIEP13B	Do you have any comments on the proposed EIEP 13B? Please give reasons and discussion where you disagree.	<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>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>In Appendix E, Business Requirement 12 references the data being provided as "the information that was used to generate the customers 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>
Q5	EIEP13B	Do you consider there are alternatives to an EIEP 13B? Please give reasons for the alternatives.	No. Cortexo is not aware of any existing formats or protocols that are suitable for fulfilling this purpose"
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?	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

Q7	EIEP13C	Do you agree that an EIEP 13C is required? Please give reasons and discussion where you disagree or consider there are alternatives.	<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> <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> <p>We also note "Consumer name": char 6 is rather short!</p>
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.	<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 <u>after</u> 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>

Q9	EIEP 13C	Do you agree with the use of a Consumer Authorisation code in EIEP 13C? If you disagree please give reasons.	<p>Cortexo does not agree with the use of a consumer authentication code in this context because:</p> <ol style="list-style-type: none"> 1. this document does not define sufficiently the way this is obtained or used; 2. it could be used by the retailer to hinder or delay a request via an agent; 3. 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 4. it seems to have a dual purpose <ol style="list-style-type: none"> a. security authentication of an agent requesting data on a consumer's behalf, and/or b. a auditing field that holds "time and boundary" (unsure what that means) information to ensure the correct data is released
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.	<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>