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TRUSTPOWER SUBMISSION: ACCESS TO CONSUMPTION DATA FORMATS AND PROCESS DOCUMENT

Trustpower Limited (Trustpower) welcomes the opportunity to provide a submission to the Electricity Authority (Authority) on its *Access to Consumption Data Formats and Process document* consultation paper (the Consultation Paper).

Trustpower's views are summarised in the following points:

- Trustpower is supportive of consumers having access to their consumption data;
- Trustpower is concerned about the requirement to provide unvalidated data to its consumers, given the potential for an increase in call volumes (even with appropriate disclaimers);
- The EIEP 13A data files are likely to be too large and complex for consumers;
- Trustpower has privacy concerns regarding validation of electronic requests by agents, and does not support the concept and structure of the EIEP 13C file; and
- Implementing these processes will increase the cost of service.

We believe it is worth noting that while the proposed solution was presented to the industry technical working group, that group still had a number of concerns which have yet to be addressed.

Our answers to the specific questions posed in the Consultation Paper are attached in Appendix A.

Regards,

TONY McGEADY
BUSINESS SOLUTIONS MANAGER

Appendix A: Responses to consultation questions

| Question | Response |
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| <p>1. Do you have any comments on the draft procedure document for the exchange of consumer consumption information?</p> | <p>1.1 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>1.2 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 last two years' data.</p> <p>1.3 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.</p> <p>1.4 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).</p> <p>1.5 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 data to the agent or consumer.</p> <p>1.6 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</p> |

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| | consumers themselves. |
| <p>2. Do you have any comments on the draft EIEP 13A?</p> | <p>2.1 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>2.2 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>2.3 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>3. Do you consider there are alternatives to an EIEP 13A? Please give reasons for the alternatives.</p> | <p>3.1 Yes. Retailers' portals and websites, which allow for self-service, are likely to be a better option.</p> <p>3.2 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>3.3 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>4. Do you have any comments on the proposed EIEP 13B? Please give reasons and discussion where you disagree.</p> | <p>4.1 As with 13A – we have the same overhead and privacy management concerns.</p> <p>4.2 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</p> <p>4.3 In a general sense, aggregate information as described in 13B is likely to be a more useful and better understood data set for consumers.</p> |

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| <p>5. Do you consider there are alternatives to an EIEP 13B? Please give reasons for the alternatives.</p> | <p>5.1 Yes. As discussed above, customer invoices and retailers' secure websites and portals.</p> |
| <p>6. Do you currently have a method for providing a consumer consumption information? If yes, what is the method and does it include the information that is in EIEP 13B?</p> | <p>6.1 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.</p> |
| <p>7. Do you agree that an EIEP 13C is required? Please give reasons and discussion where you disagree or consider there are alternatives.</p> | <p>7.1 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.</p> <p>7.2 For consumers, the EIEP 13C is not really a valid option for most.</p> <p>7.3 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 establishment and uptake of lower cost channels such as consumer portals.</p> |
| <p>8. Do you agree that an electronic request form should be provided to allow machine to machine requests provided that the retailer has verified the consumer's request? Please give reasons where you disagree.</p> | <p>8.1 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>8.2 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>8.3 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>9. Do you agree with the use of a Consumer Authorisation code in EIEP 13C? If you disagree</p> | <p>9.1 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 consumer level or data level?).</p> |

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| <p>please give reasons.</p> | <p>9.2 A data-level storage of this code means a more complex data management system build to support this process.</p> <p>9.3 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> |
| <p>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.</p> | <p>10.1 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.</p> |