

9 August 2016

Electricity Authority

Sent by Email: submissions@ea.govt.nz

Retail Data Project: A File Format for Exchanging Generally Available Retail Tariff Plan Data

Mercury welcomes the opportunity to respond to the Electricity Authority's Consultation Paper— Retail Data Project: A File Format for Exchanging Generally Available Retail Tariff Plan Data (the Paper). No part of the submission is confidential.

We note that the proposed formats in the Paper are voluntary and that retailers may continue with their preferred formats for disclosure of tariff data.

Current formats

Our preference is that retailers provide data in formats that work for them as this ultimately encourages efficiency and avoids unnecessary costs being incurred, which are ultimately born by the end user. Most retailers are already supplying tariff information to 'Powerswitch' and 'What's My Number' in a standardised format. Continuing to provide data in this format is efficient as there is no additional costs to retailers and consumers and no change is needed.

We have already disclosed tariff data in this format to requesting parties and have not had any dissatisfaction. The current Powerswitch format for presentation is transparent, efficient, and satisfactory to the consumer. Importantly, it is easy for consumers to take this information, compare it to their bills and compare it with other prices.

Finally, we note that the Authority's Decision Paper "Retail Data Project: Access to Tariff and Connection Data (24 November 2015)" states that "[t]he Authority considers that, overall, retailers will not face significant transaction costs providing this [tariff data] information. Currently most retailers provide Powerswitch with information about their generally available retail tariff plans. The Authority will work with stakeholders to develop a file format for the exchange of retail tariff plan data, for voluntary adoption". Accordingly, the Authority has clearly seen the benefits in retailers providing data as they do to Powerswitch.

For these reasons, although we provide comment on the Authority's alternative voluntary regime, we will continue with the status quo (as per formats to Powerswitch). For the avoidance of doubt, we strongly oppose the Authority making any alternative formats it develops compulsory in the future.

Alternative proposed formats



Both proposed formats set out in the Paper would in our case require system changes and therefore result in significant and unnecessary implementation costs. While customers may see savings by comparing base rates, they may be disadvantaged overall by not being able to compare the overall costs involved, including any discounts.

CSV format

Although we prefer to see all retailers using the format for disclosure as currently provided to Powerswitch, the CSV format is preferred over the JSON format. This is because it would be more user friendly to end consumers and have a lower implementation cost than the JSON format. However, as mentioned, this format is not appropriate for adoption by Mercury given the unnecessary costs and system changes that would result.

JSON

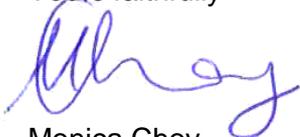
The consultation paper mentions that the JSON format is “*suited to Business to Business (B2B) transmission*”, which means that JSON would not be very consumer friendly compared to the current format or the CSV option. If the means to receive, view and interpret information is too complicated this may discourage consumers from seeking this information. It would create a similar situation around consumers being discouraged from seeking out the best deal and incurring search costs that the Authority mentioned in the initial tariff and connection data decision and reasons paper section 4.39. This will increase their search costs, and may increase retailer costs through calls responding to queries. While consumers could seek out an agent, this yet again increases their costs and also takes the power away from the consumer to seek out the best deal, as the agent would seek out a collective deal.

Conclusion

We have received a handful of tariff data requests (less than ten) and in our view this does not justify the expense of implementing the proposed new formats. Tariff data in the current format provided to Powerswitch is by far the most cost effective option going forward. It contains all the necessary information for consumers to ‘shop around’ and is easy to understand and use. Complicated formats (particularly JSON) would not have the desired effect and ultimately lead to industry and consumer costs. Accordingly, in our view the proposed formats do not support the Authority’s objective to promote competition and efficiency.

Our responses to the consultation questions are detailed in Appendix One below. If you have any questions please contact Monica Choy, Market Operations Manager, 09 308 8271, monica.choy@mercury.co.nz

Yours faithfully



Monica Choy
Market Operations Manager



Appendix One

Question	Comment
Q1: Do you have any comments on the draft EIEP 14?	This file format is mainly intended for consultants rather than consumers. Consumers would find this hard to interpret, which would lead to increased call volumes and additional cost to retailers. The code amendment specifically requires retailers to provide information about their generally available tariff plans to any person that requests them . This includes consumers. Therefore, the format must be easy for anyone who requests the data. To reduce search costs (time & effort), the data provided to consumers must be simple and easy to use. We strongly suggest retaining the current Powerswitch format.
Q2: Do you have any specific comments on any of the file format fields or business rules?	We prefer using a CSV format, as is more user friendly and easier to read.
Q3: Do you consider there are alternatives to an EIEP 14 that could be used/developed as a standard format? Please give reasons for any alternatives.	The current format that is sent to Powerswitch and What's My Number, is a preferred format as it is already in place and easy for consumers to use. No change is needed
Q4: Do you consider that within the format that the hierarchy should be "consumer" as a subset of "retailer"? Currently the format shows "retailer" as a subset of "consumer". Please give reasons.	-
Q5: What are the pros and cons of specifying a JSON format (a) for this EIEP? (b) for other EIEPs both current and future?	While JSON may be suited for B2B transmission, it is not well suited for consumer use, as it is less well understood than CSV. In addition, formatting will be required that could result in errors and incorrect comparisons. Using the JSON format would drive calls into retailers as consumers seek technical assistance using it. Changing the formats to JSON will add to costs significantly.

