

Appendix A: Format for Submission

Submitter	Metrix
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Question	Comment
Q1. What inaccuracies in data and data exchanges have you experienced, for what reasons, and with what impact?	<p>Metrix experiences data inaccuracies on the Registry on a fairly regular basis. The inaccuracies impact daily MEP functions and can confuse the data quality between participants for a specific ICP. It is apparent that information channels between participants are not consistent, which can lead to irregular numbers of days to update status and participant changes. If the Registry is seen to be the source of truth for the electricity industry, then these data exchanges need to be more accurate and timely.</p> <ul style="list-style-type: none"> • ICP Decommissions: In cases where the Distributor takes several months to update the Registry, decommissions can occur without an MEP's knowledge. The impact of these delays can be lost assets in a building demolition, continued asset lease fee charges to Traders and unnecessary non-communicating meter investigations. • Tariff changes: In the case of direct service requests from Trader to ATH, MEP's are not always advised of consequential changes to their metering installations. If these changes include changes to the register content code (e.g. removal of relay), this can cause future issues at the time of Retailer switching. • Meter Displacements: If communication with the Trader is inconsistent, then the first an MEP will hear of a displacement is when another MEP is nominated and uploads metering information to the Registry. This results in similar impact as identified for ICP Decommissions. • Mixed asset ownership inaccuracies: An MEO has limited capacity to ensure asset details and associated certification are correctly represented on the Registry, where they are not also the MEP. This is common in the Vector network with mixed ownership of load control devices, and across the country for CT installations. • Invalid RCC's & POA's: Section 4.10 raises the impact on Retailers to resolve invalid RCC's. Metrix has undergone a large and costly project to improve Registry data quality (including RCC's & POA's). Work continues on this activity and Metrix is happy to work with Retailers to investigate any specific issues that may come up. It is disappointing that there is still a significant level of invalid codes on the Registry.

	In order to improve the quality of market impacting data, there may need to be more significant impacts on participants with persistent data quality issues that do not appear to have a resolution in progress.
Q2. What are the types of benefits and the costs of being able to reduce settlement periods between industry participants?	No specific comment at this time.
Q3. What are the types of benefits and costs of more standardisation in data and data exchanges?	Standardisation enables more cost effective mechanisms for data exchange with multiple new participants; although in Metrix's view, this should not be imposed on existing participants if there are alternative mechanisms already in place.
Q4. What are the types of costs and the benefits of using more accurate available data for settling transactions?	No specific comment at this time.
Q5. What changes may be required to allow more buyers and sellers of products and services can access the industry's data systems in the future?	<p>May need to consider changes to the Registry to allow multiple participants per type for an ICP e.g. multiple Traders for a multi-register meter and possibly additional information regarding the purpose of each register e.g. solar, battery, EV charger, hot water, household load etc.</p> <p>The main concerns with third party access are in respect of privacy and third parties not "free riding" off this information (which has a commercial value). The rights of the end consumer to allow access to information should be paramount, and they should understand at all times who has access to their information and why. Access to data should align with Privacy Act requirements.</p>
Q6. What are the risks to security of data exchange and consumer privacy from more participants exchanging more data?	There are significant risks if participants have access to un-redacted or un-aggregated data that can be associated with a consumer. A new participant could implement solutions with weak controls and expose customer information, or any other system it was connected to (through B2B), to parties with malicious intent and erode consumer confidence in the entire market. Potentially need to set minimum standards to ensure sufficient security of data within participant systems and access to data should align with Privacy Act requirements.
Q7. What is your view of the Authority's overall impact assessments of the potential problems facing the electricity industry today and in the future (Table 3)? Use the Impact Assessment template in Table 10 (Appendix A) to note any changes.	No specific comment on the impact assessments at this time. However Metrix would like to understand how the impact has been assessed and suggest that clear criteria should be defined for future impact assessments. For example High Competition impact could be defined by negative financial impact on >x% of consumers.
Q8. What other potential problems do you think impact data and data exchanges for market	No specific comment at this time.

transactions? Use the Impact Assessment template in Table 10 (Appendix A).	
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