

10 June 2019

Submissions
Electricity Authority
P O Box 10041
Wellington 6143

Email: submissions@ea.govt.nz

**SUBMISSION on
Authorisation of third parties – Making it easier for consumers to share
their consumption data with businesses they trust**

Thank you for the opportunity to make a submission on this consultation paper. This submission is from Consumer NZ, New Zealand's leading consumer organisation. It has an acknowledged and respected reputation for independence and fairness as a provider of impartial and comprehensive consumer information and advice.

Contact: Sue Chetwin
Consumer NZ
Private Bag 6996
Wellington 6141
Phone: 04 384 7963
Email: sue@consumer.org.nz

<p>Q1. Do you agree with the Authority proposal to amend the Code to establish the contents required for an information request to be valid? If so why? If not why not?</p>	<p>Yes. Standardising the information required for an information request to be valid is helpful. However, the benefits of this are limited as:</p> <ul style="list-style-type: none">• An information request needs to be approved for every individual consumer• The retailer has 2 business days to reject the request because information is missing, or the retailers believes the information is incorrect or invalid• There is no proposed refinement to the time the retailer has to provide the data once the request has been accepted <p>To make it easier for consumers to share their consumption data with</p>
---	--

	<p>businesses they trust the following would be required:</p> <ul style="list-style-type: none"> • Agent authorisation is approved, managed and audited via a central registry held by the EA (removing the need for authorisation to be obtained per customer) • The data request for an individual consumer is serviced by real-time exchange of information
Q2. Do you agree with the Authority proposal to amend the Code to prohibit retailers from requiring additional information and from requiring the information to be provided in a particular format? If so why? If not why not?	Yes. However, the benefits of this are limited as per the comments in Q1.
Q3. Do you agree with the Authority proposal to amend the Code to establish timeframes for communicating a rejection or revocation of an authority? If so why? If not why not?	Yes. However, the benefits of this are limited as per the comments in Q1.
Q4. Do you agree with the Authority proposal to establish an Agent Authorisation API? If so why? If not why not?	Yes. However, the benefits of this are limited as per the comments in Q1.
Q5. Should use of proposed Agent Authorisation API be mandatory for both agents and retailers?	Yes. However, the benefits of this are limited as per the comments in Q1.
Q6. Do you agree with the inclusion of the three additional registry fields into the ICP connection data API and My meter web portal? If not why not?	<p>(a) N/a: Business not residential data therefore not relevant for Powerswitch</p> <p>(b) As per a)</p> <p>(c) Yes</p>
Q7. Do you consider that there are other fields that have not been identified that should be added to the ICP connection data API and My meter web portal? If so why?	Yes. However, these are not relevant to this submission document.
Q8. Do you agree that the proposals do not breach the obligations imposed by the Privacy Act of 1993? If not why not?	Yes, as long as the consumer has agreed for the agent to access their information on their behalf.

Q9. Do you agree with the costs and benefits of each of the proposals? If not, why not?	We believe the benefits of the proposals are limited as per the comments in Q1.
Q10. Are there any other costs or benefits we have not identified?	No.
Q11. Do you have any comments on the drafting of the proposed amendment?	We believe the benefits of the proposals are limited as per the comments in Q1.

Thank you for the opportunity to make a submission. If you require any further information, please do not hesitate to contact me.

Yours sincerely



Sue Chetwin
Chief executive