

10 June 2019

Submissions Electricity Authority PO Box 10041 Wellington 6143

By e-mail: submissions@ea.govt.nz

Electric Kiwi supports making it easier for consumers to share their consumption data

Electric Kiwi supports the proposals in the ACCES Quick Wins consultation paper.

We query whether requiring customer signature (electronic or otherwise) should be needed to confirm consent. This is likely to be problematic for many customers, and isn't needed for switching. It might be better if the consent requirements for data sharing and customer switching are more closely aligned.

Electric Kiwi supports consumer choice and promotion of stronger competition

We are supportive of the work being undertaken to facilitate consumer choice, including the IPAG work in relation to data and metering.

The ACCES Quick Wins project should be relatively straightforward and require minimal time and resources to implement. This is important given there are other projects which should drive much more substantial improvements in competition, consumer choice and better consumer outcomes, including addressing the two-tier retailer market (saves and win-backs), spot market trading conduct and hedge market development (market-making).

Observations about the ACCES Quick Wins project

Electric Kiwi welcomes that the Electricity Authority undertook a post-implementation review of the 2016 reforms. We consider this to be good regulatory practice. The value of the review was reflected in the fact it identified authorised agents were still experiencing delays in being able to access of users' consumption data.

We also welcome that the Electricity Authority considered relevant evidence from the Electricity Price Review "that agents have experienced delays and increased costs because retailers decide individually what criteria and processes to apply, and this lack of standardisation complicates or even hinders agents' access". We would like to see the Electricity Authority draw on the Electricity Price Review for other projects, such as saves and winbacks, where relevant.



Yours sincerely,

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