

Submission on Quick Wins for Access to Customer Data

Submitter	Energy Link Ltd
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<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. From an agent/broker perspective all information can be gathered efficiently.</p> <p>One observation: Open ended authorisations leaves the customer with the task of revoking third party access no longer wanted. We believe it good practice for all authorisations to be valid for a limited period (suggest 12-months).</p> <p>One question: It is common for many retailers to offer combination deals with gas and/or LPG. Has any been given to how access to data might be facilitate for alternative energy sources provided to the customer by the incumbent electricity retailer?</p>
<p>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?</p>	<p>Yes. Information provided should be sufficient for a retailer to uniquely identify the data being requested.</p> <p>Observation: The level of accuracy of customer name and address details required by automated retailer systems may result in a high level of rejection.</p>
<p>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?</p>	<p>Yes. Certainty around turnaround times will improve customer confidence in third party services. Ideally the process for acceptance or rejection of a request will improve to near real time for the majority of straight forward cases.</p>
<p>Q4. Do you agree with the Authority proposal to establish an Agent Authorisation API? If so why? If not why not?</p>	<p>We strongly agree with this proposal. It will enable agents and brokers to build robust, efficient and reliable systems for electricity procurement and energy efficiency purposes.</p>
<p>Q5. Should use of proposed Agent Authorisation API be mandatory for both agents and retailers?</p>	<p>On balance we believe the API should be mandatory. The benefit of having a single, independent and auditable record of authorisation requests will increase both the efficiency of the information request process, and the confidence of all parties in the chain.</p>
<p>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>	<p>Yes. The additional fields all have obvious uses. reducing the number of procurement related queries</p>
<p>Q7. Do you consider that there are</p>	<p>Yes. We would like the API and portal to include a field</p>

<p>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?</p>	<p>indicating the profile code or profile class applicable to the ICP (or any other field clearly identifying the reconciliation method for the ICP).</p> <p>Prior to the advent of AMI meters it would be relatively easy to establish the reconciliation method for an ICP. However, today consumption at ICPs smart meters may be reconciled half hourly or against a residual profile shape (for example an ICP may have a single meter typed as 'HHR' and flagged as AMI and still be reconciled against an RPS, we have also seen cases where metering is typed as 'NHH' yet billed on a HHR basis). This has implications during procurement both for how profile information is provided to retailers when requesting offers and in what form (and in some cases if) retailers make a response.</p> <p>The ability to present historical consumption data and request pricing in a form appropriate to an ICP's profile type would help the procurement process by reducing the number of related queries and improving the comparison of competing offers.</p>
<p>Q8. Do you agree that the proposals do not breach the obligations imposed by the Privacy Act of 1993? If not why not?</p>	<p>No comment.</p>
<p>Q9. Do you agree with the costs and benefits of each of the proposals? If not, why not?</p>	<p>No comment.</p>
<p>Q10. Are there any other costs or benefits we have not identified?</p>	<p>No comment.</p>
<p>Q11. Do you have any comments on the drafting of the proposed amendment?</p>	<p>No comment.</p>