



14 June 2019

Submissions  
Electricity Authority  
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By email: [submissions@ea.govt.nz](mailto:submissions@ea.govt.nz)

Electricity Authority's (EA) consultation paper: **'Quick wins for increasing access to electricity services'**

Thank you for the opportunity to comment on the Electricity Authority's (EA) consultation paper: 'Quick wins for increasing access to electricity services'.

We support the EA's efforts to make it easier for consumers to share their historical consumption data with organisations they trust. In particular, Contact supports the development of a standardised and efficient way for our customers' to grant any trusted third party access to their data and proposes the concept of implementing a new accreditation scheme for agents.

For further details and Contact's response to the specific questions in the consultation paper please see Appendix B.

Contact continues to be committed to ensuring its customers' personal information is secure and protected from any unintended use or disclosure.

We look forward to working with the EA in the long term interests of our customers and benefit of the sector.

Yours sincerely

A handwritten signature in black ink, appearing to read "Debby Abrahams".

**Debby Abrahams**  
Commercial Manager]

Appendix B	Format for Submissions
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Submitter	Contact Energy Limited
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	Question	Comment
1	Do you agree with the Authority's proposal to amend the Code to <b>establish the contents required for an information request to be valid</b> ? If so why? If not, why not?	<p>Contact acknowledges that the flow of data is important to the efficient operation of the electricity system, as well as competition and innovation in the industry. Contact supports the proposal to create a standardised and efficient way for consumers and their agents to easily access consumption data.</p> <p>However, a simple notification via the Agent Authorisation API Notification (Authorisation API) that an agent is authorised is not sufficient to manage the risk of agents acting without the appropriate authorisations.</p> <p>In order to ensure that agents have written authority from or are properly authorised by a customer to obtain their information, as is required by the Privacy Act, Contact proposes that the Authority:</p> <ul style="list-style-type: none"> <li>implement an accreditation scheme for agents. This will provide the assurance to retailers that they are dealing with reputable agents. This accreditation scheme would require agents to register with the Authority and accept the terms and conditions of the Authorisation API including (a) warrant that they have evidence of their authority (b) provide copies of those authorisations on request by retailers (as permitted by clause 11.32E(2) (c) undergo regular audits by the Authority to check their compliance with the Code; and/or</li> <li>amend clause 11.32E(2) to specify further criteria on which an agent will be deemed to have authorisation from the customer.</li> </ul>
2	Do you agree with the Authority proposal to amend the Code to <b>prohibit retailers from requiring additional information and from requiring information to be provided in a particular format</b> ? If so why? If not why not?	<p>Contact does not support the Authority's proposal to prohibit retailers from requiring additional information unless it has confirmation that the agent has the relevant authorisation from the consumer.</p> <p>Contact proposes that this be done by implementing the measures referred to in 1 above – ie either by having the Authority accredit the third party agents and/or amending clause 11.32E to specify the criteria on which an agent has authorisation from the customer.</p>
3	Do you agree with the Authority proposal to amend the Code to <b>establish timeframes for communication a rejection or revocation of an authority</b> ? If so why? If not why not?	<p>Contact supports the two business day timeframe for communicating a rejection or revocation of authority provided Contact has assurance that the Authorisation API has evidence of authorisation (as set out above). If not, we recommend the maximum five day timeframe to provide the data (clause 11.32B) of the Code) should be retained. We encourage the Authority to consider the current discrepancy in respect of timelines in the Code (5 working days) and the Privacy Act (20 working days).</p>
4	Do you agree with the Authority proposal to <b>establish an Agent Authorisation API</b> ? If so why? If not why not?	<p>Contact supports the Authority's proposal to establish an Authorisation API using the Authority's existing API infrastructure. This will create an efficient, seamless, less resource-intensive process for communicating authorisations (and their acceptance/rejection) between retailers and agents.</p> <p>In order to implement an accreditation regime for agents, Contact proposes that the Authority's API terms and conditions be amended– ie to incorporate</p>

		agents warranting that by their use of the API they have authorisation to request personal information on behalf of customers, they are in possession of a duly executed authorisation from a consumer, which a retailer may request at any time, and that the Authority may conduct regular audits to confirm that they are in compliance with the above obligations and the Code in general.
5	Should use of the <b>proposed Agent Authorisation API be mandatory</b> for both agents and retailers?	<p>Contact supports the Authority's intention to mandate the use of the Authorisation API to fully standardise the agent authorisation process between retailers and agents.</p> <p>Contact agrees with the additional benefits of mandatory use of the Authorisation API including the creation of a central record of agent authorisations and the maintenance of a register of all acceptances, rejections and reasons for rejections.</p>
6	Do you agree with <b>the inclusion of the three additional registry fields</b> into the ICP connection data API and <i>My meter</i> web portal?	Contact supports the inclusion of the three additional registry fields to allow agents to tailor their service offerings to consumers and to provide assurance that the agent is dealing with the correct ICP, provided that the increase in data does not drive other third parties to use the ICP connection data API and mymeter portal to market services not requested by consumers.
7	Do you consider that there are <b>other fields that have not been identified that should be added</b> to the ICP connection data API and <i>My meter</i> web portal? If so why?	No.
8	Do you agree that the <b>proposals do not breach the obligations imposed by the Privacy Act of 1993</b> ? If not why not?	As discussed and agreed at the most recent Authority workshop we recommend that the Office of the Privacy Commissioner provides their view on the Authority's recommendation to the Board, prior to implementation.
9	Do you <b>agree with the costs and benefits of each of the proposals</b> ? If not, why not?	No comment.
10	Are there any <b>other costs or benefits</b> we have not identified?	Contact will need to change its current processes both at a system and staff training level. This will incur additional costs which will need to be factored into budgets, technical development/testing and training timelines.
11	Do you have any <b>comments on the drafting of the proposed amendment</b> ?	<p>It is proposed that the Authority specify criteria on which an agent will be deemed to have authorisation be incorporated into the proposed clause 11.32E amendment.</p> <p>It is further proposed that the Authority amend the Code (where appropriate) to allow for an accreditation regime for agents as referred to above.</p>