

Our Energy submission re: Technical Consultation Paper - ACCES Quick Wins

1. Our Energy welcomes the opportunity to provide a brief submission on the Electricity Authority's technical consultation paper, "Amendments to clause 11.32E of the Electricity Industry Participation Code and EIEPs 13A, 13B and 13C".
2. No part of this submission is considered confidential. We welcome further engagement with the EA as it continues its progress towards making these and other potential changes as part of its ACCES workstream.

Q1. Do you have contrary views to those of Victoria Casey QC?

3. No. We think Victoria Casey QC's views are sound. We commend the EA for seeking her advice. We expect the resulting amendments to finally dispel the 'privacy concerns' myths that have been peddled by vested interests to the detriment of New Zealand consumers and productivity for far too long.

Q2. What are your views on the drafting of the proposed amendment to clause 11.32E of the Code?

4. We are comfortable with the drafting of this proposed amendment.

Q3. What are your views on the amendments to EIEPs 13C, 13A and 13B?

5. We understand and accept that improving existing EIEPs probably qualifies as a 'quicker win' than the creation of a standalone API. It is concerning, though, that the brief discussion and reasoning for the amendments appears to let market participants 'off the hook', rather than providing an allowed period of transition.
6. APIs are hardly breakthrough or experimental technology in the digital age. Market participants should be encouraged, and even incentivised, to get with the times. The EA has already made use of APIs for enabling access to pricing and ICP data, further demonstrating that this technology is not new. Arguably though, investment in this area has been lacking.
7. The EA should be pushing itself and market participants to digitise more services and lobbying for the appropriate level of investment to enable it to do so. The EA's statutory purpose includes promoting "...the efficient operation of, the New Zealand electricity industry for the long-term benefit of consumers". Providing a standalone API creates efficiency and allows for innovation, which ultimately benefits consumers.
8. Two of the stated benefits of the amendments - leveraging off existing systems and processes and limiting changes to existing agent and retailer systems - oddly appear to count some level of sunk costs as a calculable benefit. Market participants surely need time to adjust, but laggards should not dictate the pace of change.

Q4. Do you have any comments on the drafting of the proposed amendment?

9. No. As above, we are comfortable with the drafting here.