



18 November 2019

Submissions
Electricity Authority
PO Box 10041
Wellington 6143

By email: ACCES@ea.govt.nz

Technical Consultation Paper – ACCES Quick Wins

Contact Energy (**Contact**) supports the Authority's efforts to make it easier for consumers to share their historical consumption data with organisations they trust, develop a standardised and efficient way for customers' to grant trusted third parties access to their data and establish an accreditation regime to build trust between agents and retailers.

Contact is committed to ensuring our customers' personal information is secure and protected from any unintended use or disclosure and supports the proposals in this Technical Paper. However, we would like to highlight several practical implementation issues:

1. **Timing for roll-out of proposals:** The Authority has indicated decisions will be published by the end of 2019, however as this is over the holiday period we request at least a 3 month roll out period to allow for IT brown/black-out periods and staff availability. This will provide the necessary time to manage and implement system and process changes to comply with the new requirements.
2. **No parallel systems roll out:** The current and proposed third party data access processes are different and Contact proposes that instead of a parallel roll-out of the proposed process with the current process, the Authority require a clear date when the new process will take over from the old process. This will help avoid confusion and ensure transparency between customers/agents and retailers.
3. **Agent warranty/indemnity in Authority terms and conditions:** Contact understands that the agent accreditation regime is not part of this technical consultation, however we request the Authority afford retailers the same warranty (clause 2.5) and indemnity (clause 6.3) in the Hub Terms and Conditions as applicable between the agent and the Authority to provide retailers with assurance of the agents' authority. We also propose the Authority consider how this could operate in similar instances when the agent elects not to use the EIEP Hub to request the consumption data.

We are happy to discuss and provide further information on any of the matters raised in our submission. Please don't hesitate to contact me or merinda-lee.hassall@contactenergy.co.nz.

Yours sincerely

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

Debby Abrahams
Commercial Manager