

# Making it easier for consumers to share their consumption data

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Decision paper

14 January 2020









submitters' feedback and further consideration of the issues, including advice from the Office of the Privacy Commissioner (OPC) and Victoria Casey QC.

### **Decision: Amend existing information exchange protocols to standardise and streamline the communication of an authorisation**

- 1.9 The Authority has decided to not create a new API. Instead, the Authority has decided to amend EIEP13C by adding an additional field, place stronger requirements for retailers to comply with the request together and set monitoring in place. This will streamline this process without the need to establish a new API, and will limit the need for changes to retailer or third party systems and processes.
- 1.10 In addition to enabling the communication of requests and responses, other key changes to the EIEP 13 process are to change the EIEPs (including business rules) and procedures to:
  - (a) recommend that agents use the EIEP Hub to submit the EIEP13C
  - (b) require retailers to respond to such requests via the EIEP Hub
  - (c) add a field to EIEP13C to record the date the agent's authority expires.
- 1.11 These amendments will enhance the efficiency of, and parties' confidence in, the process for communicating data requests and responses.
- 1.12 The amendments to the EIEP 13 process also include the monitoring and logging of key metadata of the exchange of data requests and consumption data between consumer agents and retailers. This log data will enable the Authority to monitor and report on the effectiveness of the new arrangements, in particular:
  - (a) the number of authorities rejected
  - (b) the reasons for the rejection
  - (c) the time taken for retailers to either reject the authority or provide the data.

### **Decision: Accreditation and approval protocols**

- 1.13 The Authority has decided to incorporate an accreditation and approval process for agents into the Terms and Conditions for use of the EIEP Hub. We have drawn on the Australian Consumer Data Right arrangements, and in particular the 'Accredited data recipient' concept, in designing our accreditation and approval protocols.
- 1.14 This will give consumers, retailers and the Authority greater confidence in the arrangements for agents requesting, receiving and using a consumer's consumption data. It applies to agents who are not participants and would therefore not otherwise be bound by Code provisions which impose similar obligations and constraints on participants.
- 1.15 The EIEP Hub Terms and Conditions for Use will apply to both non-participants and participants. The Authority intends to publish the new EIEP Hub Terms and Conditions in February 2020.
- 1.16 The new EIEP Hub Terms and Conditions for Use will feature:
  - (a) a requirement for agents to warrant that they hold a valid customer authority, in scope and duration, for each request

- (b) a requirement to not use provided data in a way not consented to by the consumer, or in order to provide goods and services that the consumer has not agreed to
  - (c) a right for the Authority to:
    - (i) conduct an audit, request evidence or otherwise investigate if an EIEP Hub user has breached of the Terms and Conditions for Use including submitting an EIEP 13C data request without a valid customer authority
    - (ii) restrict or terminate access to the EIEP Hub in the event that we consider that an agent has breached the Terms of Use
  - (d) indemnify the Authority for any loss it incurs as a result of the agent's use of the EIEP Hub.
- 1.17 By being granted access to the EIEP Hub applicants agrees to be bound by the Authority's Terms and Conditions for Use and eligibility criteria.
- 1.18 The Authority will have the right to immediately suspend or terminate an agent's use of the EIE system if the Authority considers that the agent has breached the Terms and Conditions for Use.
- 1.19 Existing agents will need to reapply and agree to be bound by the revised terms and conditions and be approved by the Authority before 1 March 2020 or their access will be cancelled.

### **Decision: ICP connection data API and My Meter website changes**

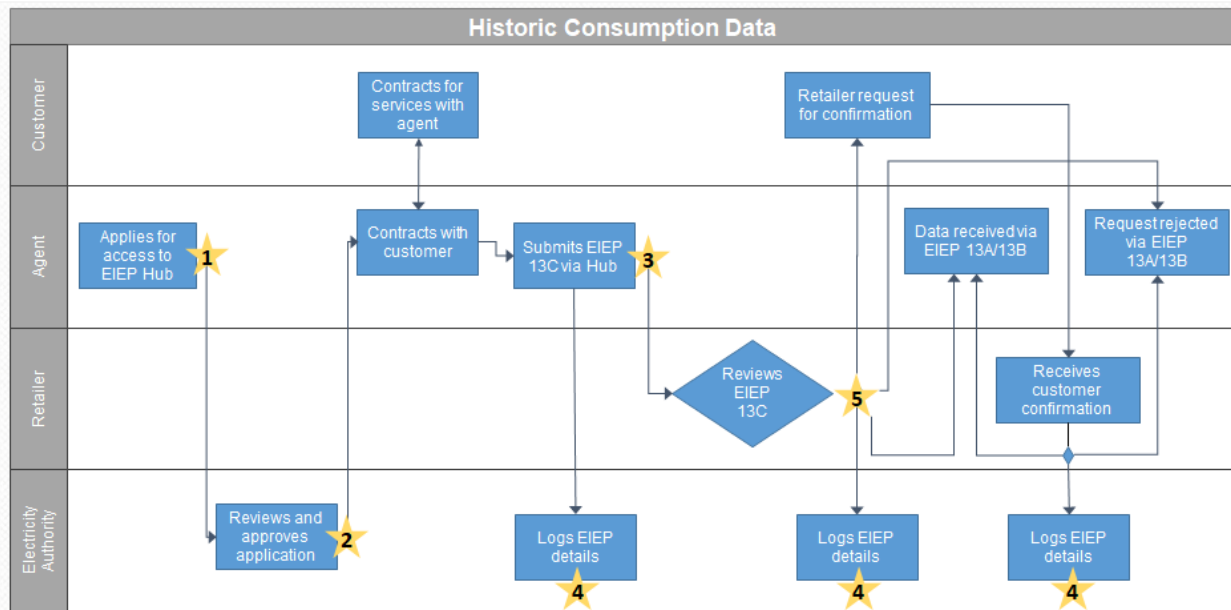
- 1.20 The Authority has decided to make more data available through the ICP connection data API and My Meter webpage.
- 1.21 On the recommendation of submitters, the Authority has elected to include five fields that were not in the April 2019 consultation paper. The Authority considers these are of benefit to either consumers or their agents, and that they do not contain personal information.
- 1.22 The following registry fields will be made available via both the ICP connection data API and My Meter webpage:
- (a) Address property name (available only where this has been populated by the distributor)
  - (b) ANZSIC code
  - (c) Initial electrical connection date (note that the Code does not require this field to be populated for ICPs created before 29 August 2013)
  - (d) Meter certification date expiry
  - (e) Meter settlement indicator (note that the registry does not indicate what retail rates are applied by the retailer, this field is only relevant to the programming of meter registers that may or may not be used in the settlement and invoicing processes)
  - (f) Metering Component type
  - (g) Profile Code
  - (h) Switch status (Trader switch in progress).

1.23 Submissions indicated that the address property name registry field currently contains some personal information. Therefore, the inclusion of the address property name registry field will be postponed until 1 March 2020 to provide the opportunity for distributors to update the field to remove all personal information.

### The four initiatives work together as a package

1.24 The revised process for agents to gain authorisation and make data requests on behalf of consumers is shown in Figure 1. The notes describe the key elements of the Authority’s integrated package of initiatives.

**Figure 1: Amended authorisation and request process under clause 11.32E**



- ★ 1 The terms and conditions of access to the EIEP<sup>1</sup> are amended to enshrine key obligations and to provide the right for the Authority to investigate and/or audit any authorities communicated by the EIEP Hub.
- ★ 2 All existing EIEP Hub users will have access suspended unless they agree to the revised terms and conditions of access and have had access approved by the Authority.
- ★ 3 EIEP 13C is altered to include an authority expiry date field and to stipulate that the use of the EIEP Hub is mandatory where the request is provided by an agent.
- ★ 4 The Authority will extract and log key details contained in each EIEP to monitor use and compliance. No personal data will be stored by the Authority.
- ★ 5 Clause 11.32 of the Code is amended to set out the information an authority needs to contain, to set timeframes and permissible reasons for rejecting a request, and timeframes for delivering consumption data for accepted requests.

1.25 Note that

- (a) the Code requirements relate to retailers and consumption information only. Retailers do not need to release generation information where the retailer has purchased electricity from its customer, and is acting in that case as a generator

<sup>1</sup> Electricity information exchange protocols (EIEPs) are documents the Authority prepares and publishes, following industry engagement. They provide a set of cost-effective standardised formats for business-to-business information exchanges.

- (b) the Code requirements apply to anyone that sells electricity, including all type 2 retailers regardless of how the electricity is sourced.

### **Implementation timetable and next steps**

- 1.26 The Code amendment will come into force on 1 March 2020. The additional fields will be available via the Connection Data API and *My Meter Website* on 1 March 2020.
- 1.27 The Authority has written to all distributors requesting they remove all personal information from the address property name field and all other registry fields.
- 1.28 The revised EIEP Hub terms and conditions of use will come into effect immediately from the date they are published for all users of the EIEP Hub. The Authority will write to existing users and request that they re-apply for access to the EIEP Hub prior to 28 February 2020 or their access will be suspended.
- 1.29 In order to allow retailers and agents to amend existing systems and processes, the effective date for the revised EIEP13s will be 1 March 2020.



## 2 Background

- 2.1 On 23 April 2018, the Electricity Authority published a consultation paper titled Quick Wins for Increasing Access to Electricity Services. This consulted on a proposal to:
- (a) amend the Code to set out the information required for an agent request for a customer's historical consumption data to be valid and prohibit retailers from mandating the form a request must take or requiring other information
  - (b) develop an automated programming interface (API) for:
    - (i) an agent to communicate to a retailer they have a customer's authorisation to obtain that customer's historical consumption data
    - (ii) a retailer to accept or reject an authorisation and provide the reasons for any rejection
  - (c) alter the existing installation control point (ICP) connection data API to include three additional registry fields.
- 2.2 The proposals sought to assist consumers make more informed choices by making it easier to share their data with businesses that they trust to help them get a better deal or use electricity more wisely.
- 2.3 For vulnerable customers this may include sharing their data and getting advice from social agencies and not-for-profit organisations such as Consumer NZ, PowerSwitch, budget advisers, or the Salvation Army.
- 2.4 This paper sets out the Authority's decisions after considering submissions on these proposals, and further discussions with industry and the Office of the Privacy Commissioner.
- 2.5 The reforms form part of the Authority's ongoing Additional Consumer Choice of Electricity Services (ACCES) project. This project aims to deliver consumers greater choice in the electricity services they consume and offer for sale.
- 2.6 More information about the ACCES project is available on our website at:  
<https://www.ea.govt.nz/development/work-programme/evolving-tech-business/acces/>

### Access to consumption data as a key issue

- 2.7 In its Options paper published February 2019, Government's Electricity Price Review (EPR) Panel identified issues with access to retailer data about customers' electricity consumption.<sup>2</sup> Amongst other things, the Options paper noted that retailers decide individually what criteria and processes to apply when considering requests from agents, and this lack of standardisation complicates, or even hinders, agents' access.
- 2.8 In its Final Report the EPR Panel recommended and there should be a simple process for nominating such agents. The EPR Panel also noted that it strongly supports Authority's initiatives for the transfer of data between retailers and consumers' agents.<sup>3</sup>
- 2.9 The Authority has been mindful of the consumption data access issues identified in the EPR process and recommendations. The initiatives set out in this paper will deliver on the outcomes sought by the EPR Panel.

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<sup>2</sup> Electricity Price Review Options paper, February 2019, option C3, page 15.

<sup>3</sup> Electricity Price Review Final Report, October 2019, option C3, page 35.

## **Unauthorised disclosure of personal information is an industry wide concern**

- 2.10 Throughout the ACCES project and in the development of the consultation proposals we heard, in no uncertain terms, that unauthorised disclosure of personal information is of great concern for consumers and the industry. We agree that in designing, implementing and administering the arrangements for access to consumption data, we must give careful consideration to potential privacy implications.
- 2.11 After publishing the consultation paper, we held a roundtable with the industry and the Office of the Privacy Commissioner (OPC) to build a common understanding of the proposals (27 May 2019). In addition to discussing the Authority proposals, attendees heard from the OPC on how the Privacy Act 1993 (Privacy Act) is consistent with innovation in the electricity sector. More information on the roundtable event, including a summary of the key points that emerged in discussion, is available from the Authority's website.<sup>4</sup>
- 2.12 The Authority had intended seeking an advisory opinion from the OPC. We subsequently received advice from the OPC that the issues were unsuitable for an advisory opinion. This is because the Privacy Act prevails over the Code in the statutory hierarchy and therefore does not give rise to a point of interpretation. However, we continued to engage with the OPC about the inter-relationship of the Code and the Privacy Act and clarifying how the Code can achieve the policy objectives in a manner consistent with the Privacy Act.
- 2.13 The advice provided from the OPC prompted the Authority to seek further advice from Victoria Casey QC on whether:
- (a) the proposed amendments to Clause 11.32E (including the additional new clauses), EIEPs 13A, 13B and 13C and Hub Terms are consistent with the obligations on the Authority or affected industry members (primarily agents and retailers) under the Privacy Act
  - (b) what steps might be required for a retailer to satisfy themselves of the requirements of section 45 of the Privacy Act.

## **The Authority engaged with stakeholders before finalising the package**

- 2.14 Changes were made to each of the proposals in response to submissions. Given the largely technical nature of the changes the Authority chose to conduct a limited consultation on the drafting of clause 11.32E of the Code and revision to EIEPs 13A 13B and 13C. A short consultation paper was published on 5 November 2019.
- 2.15 A technical consultation paper was released by the Authority on 5 November 2019, six submissions were received on this paper. A summary of the submissions to the technical consultation is set out in sections 5 and 6 below. A stand-alone summary of submissions will not be separately published.

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<https://www.ea.govt.nz/development/work-programme/evolving-tech-business/acces/events/roundtable-to-hear-views-on-efforts-to-make-it-easier-for-consumers-to-share-information-with-organisations-they-trust-2/>

### 3 Outcomes from the suite of improvements making it easier for consumers to share their consumption data

- 3.1 Our statutory objective is to promote competition in, reliable supply by, and the efficient operation of, the electricity industry for the long-term benefit of consumers. This section sets out how our decision to implement this package of initiatives promotes our statutory objective.

#### **Our decision promotes competition and efficiency**

- 3.2 Our decision to implement this package promotes competition and efficiency by establishing a process which will:
- (a) improve the timeliness of the delivery of consumer data by retailers to consumers agents
  - (b) provide consumers with confidence that their data is only going to parties (agents) they trust
  - (c) provide retailers with confidence they are meeting their obligations under the Privacy Act when providing a consumer's historical consumption data to a consumer's agent.
- 3.3 In aggregate these initiatives should promote new and innovative offers being made to consumers.

#### **Our decision improves timeliness of the delivery of consumer data to agents**

- 3.4 The decision is expected to improve timeliness for delivering consumer data to agents by:
- (a) limiting the circumstances where a retailer can refuse to provide a consumers' data to an agent to:
    - (i) where doing so would be a breach of the Privacy Act
    - (ii) where the retailer has reasonable grounds to believe the information is contained in the request incorrectly or if the retailer is unable to identify the property or ICP.
  - (a) establishing a minimum industry standard for what can be regarded as being 'as soon as reasonably practicable' for a retailer to accept, reject, and respond to a request from an agent via:
    - (i) Code amendments to require a retailer to reject a request or request information to confirm an authority within 2 business days - this is a maximum, and a reduction from the 20 day threshold currently adopted by some retailers for making a decision
    - (ii) updated EIEP procedures for requests for consumer consumption information.
  - (b) improving the EIEP 13 framework, and requiring retailers to use the existing EIEP Hub if it is used by the agent. This will standardise and streamline the data request/delivery process because:

- (i) the existing EIEP Hub provides a mechanism for the near-instantaneous delivery of both the request for data and the data itself

The timeliness of the process will however remain dependent on retailers adopting practices which support prompt decision making, and the rapid extraction of data from their systems, and it into the EIEP13A/B format.

It is not known how many retailers currently have this capability. It is likely some retailers will continue to use a manual process to meet the 2 day/5 day time limits set out in the Code in the near term.

- (c) providing retailers greater assurance that agents will act properly, and will have proper authorisation for consumers by introducing an accreditation scheme for agents (via changes to the EIEP Hub Terms and Conditions for Use). Agents face losing access to the EIEP Hub if they breach the terms of use. This increased trust should result in reduced requests for further information and retailers contacting customers to confirm authorities.
- (d) logging EIEP requests/responses means we can report timeliness of retailers' decisions, delivery, and the reasons for rejections. The public reporting of this data will put pressure on retailers to meet expectations. Ongoing failure to meet expectations on timeliness will provide grounds for more forthright intervention by the Authority.

For retailers not meeting the 2 day and 5 day timeframes is a breach of the Code. The identification of these breaches will no longer be dependent on a third party reporting the breach.

## **Consumers can be confident their data is being shared with parties they trust**

- 3.5 Our decisions are expected to provide consumers with confidence their data is only shared with those they choose to share it with by:
  - (a) creating explicit obligations for agents via the EIEP Hub terms of use to obtain consumer authorisation and act properly, and establishing sanctions for not meeting those requirements. This includes a right for the Authority to audit whether an agent has properly obtained an authority, and terminate access to the EIEP Hub.
  - (b) highlighting that the Privacy Act applies to household data exchanges, and all parties holding data must meet their Privacy Act requirements (ie retailers and agents).
- 3.6 These requirements are expected to be strengthened by the Privacy Bill 2018 when enacted, which includes provisions (section 212) which would make it a criminal offence for a party (ie agent) to fraudulently obtain personal information (.e liable to be convicted and fined \$10,000 per offence). This would result in an agent obtaining consumption data without consumer consent facing criminal proceedings.

## **Retailers who act in good faith can be confident that they are not breaching the Privacy Act**

- 3.7 Our decision is expected to provide retailers with confidence they face a low risk of breaching the Privacy Act when delivering data to an agent by:

- (a) providing retailers greater assurance that agents will act properly, and will have proper authorisation from consumers by introducing a proxy accreditation scheme for agents (as described above)
- (b) highlighting that section 115 of the Privacy Act protects retailers from both civil and criminal proceedings where data is provided in good faith in accordance with Privacy Principle 6. The decisions establish a data request/delivery process, which retailers should be able to rely on in good faith.

## 4 We considered the following matters in reaching our decision

- 4.1 We received 24 submissions on our April 2019 consultation paper (Table 1). Submissions, and a summary of submissions, are available on our website at: <https://www.ea.govt.nz/development/work-programme/evolving-tech-business/acces/consultations/>

**Table 1: Summary of submitters**

Category	Submissions
Advocacy organisations	Consumer NZ, ERANZ
Distributors	Aurora Energy, Network Waitaki, Orion, Powerco, Vector, WEL networks
Third party service providers	Cortexo, Energy link, Our Energy
Retailers	emhTrade, Electric Kiwi, Flick Electricity, Genesis Energy, Mercury, Meridian Energy, Nova Energy, Trustpower, Vector
Individuals	Alan Barraclough, Stephen Cope

- 4.2 Issues raised by submitters fell into two main categories:
- (a) privacy
  - (b) accountability of third party service providers.
- 4.3 There was consensus across submissions on the importance of consumers (either directly or through their agents) having an efficient and reliable means to access and use their consumption data, and the ability to share that data with those they trust.
- 4.4 Many submitters encouraged the Authority to have further engagement with the Privacy Commissioner on a range of points, including to ensure the proposals align with the Privacy Act and to identify what information is required to satisfy the recipient of an information request that the agent has the necessary authorisation before releasing a customer’s consumption data.
- 4.5 Submitters agreed that the protection of consumers’ data is paramount. Submissions also emphasised the need for an appropriate balance to be struck between timely flow of information and ensuring adequate safeguards are in place to protect consumer data against unauthorised disclosure.

### ***Submitters made comment on the cost and benefits of the proposals***

- 4.6 Submitters were split between those who agreed and those who disagreed with the identified costs and benefits of the proposals.
- 4.7 Those that supported the Authority's analysis agreed the costs and benefits had been accurately identified (Cortexo, Network Waitaki and WEL Networks), and that the proposals should be relatively straightforward and require minimal time and resources to implement (Electric Kiwi). Our Energy considered that the potential benefits may even be understated in the Authority's analysis.
- 4.8 Retailers and gentailers largely disagreed with the Authority's identified costs and benefits, submitting that the costs associated with integrating the proposals at an operational level were insufficiently identified (Flick, Contact and Genesis). ERANZ suggested the costs would be significant, and would ultimately be borne by consumers.
- 4.9 Mercury Energy submitted the proposal increased costs to retailers for no real benefit and would render sophisticated systems already implemented redundant.
- 4.10 Meridian/Powershop noted the estimate of \$50,000 for the establishment of an Agent Authorisation API was on the lower end of the scale and did not appear to allow for associated matters (such as automatic verification checks of data).
- 4.11 Genesis Energy noted that a portion of the proposal's costs could be avoided by leveraging existing systems and processes.
- 4.12 ERANZ and Mercury Energy submitted the proposals would be of no real benefit to consumers, due to consumers being increasingly able to access and share their data without retailer involvement through the use of technology.
- 4.13 Retailers submitted that reputational costs of unauthorised disclosure were not adequately considered (Flick Energy, Genesis Energy and Meridian/Powershop).

### ***Responses to the technical consultation paper***

- 4.14 The Authority received six submissions in response to the 5 November 2019 technical consultation paper.
- 4.15 Issues raised by submitters include:
- (a) reservations with the advice provided by Victoria Casey QC (Mercury)
  - (b) suggested drafting changes to the proposed clause 11.32E and EIEP 13C (Cortexo, Meridian, Mercury and Genesis)
  - (c) implementation timeframes (Contact)
  - (d) the use existing EIEPs rather than the creation of modern APIs (Our Energy).

## **5 Decision: Amend clause 11.32 of the Code**

### **Authority proposal**

- 5.1 Clause 11.32E of the Code requires retailers to treat a request for information about a consumer's electricity consumption from an authorised agent as if it were a request from the consumer itself.
- 5.2 The Authority identified problems with the Code arrangements and the industry practice. These resulted in unnecessary transactions costs and consequently stymied innovation and greater consumer participation in the industry. These stem from:



- (a) the Code being silent on what constitutes a proper request
  - (b) a lack of standardisation in processes and systems for approval of a request for information.
- 5.3 To address these problems, the Authority proposed in its 23 April 2019 consultation paper to amend clause 11.32E to:
- (a) specify the information required for a request to be valid
  - (b) explicitly permit the use of electronic signatures
  - (c) prohibit retailers from requiring the information to be provided in a particular format
  - (d) prohibit retailers from requiring additional information
  - (e) require retailers to advise the agent within 2 business days if the retailer rejects a request because information is missing, or the retailer believes that information is incorrect or invalid
  - (f) require retailers to advise the agent within 2 business days if a customer tells the retailer it revokes an agent's authority
  - (g) require agents who are participants to notify the retailer within 2 business days if the customer tells the agent its authority is revoked.

### **Submitters' views**

- 5.4 Third party service providers and distributors generally agreed that amending the Code as proposed would be useful and would provide some certainty and consistency about what was required when requesting information.

### ***Submitters wanted standardisation and streamlining***

- 5.5 Some submitters felt that inefficient access to data is a barrier to innovation and consumers making informed decisions (Aurora) and there is a lack of clarity about the interaction between the Code and the Privacy Act (Powerco).
- 5.6 Several submitters agreed with the proposal and felt that it would provide some certainty and consistency as to what was required when requesting information (Cortexo, emhTrade, Network Waitaki and Our Energy).

### ***Submitters wanted the creation of safeguards***

- 5.7 Many submitters provided qualified support for the amendment, suggesting additional changes such as a need for agents to be regulated, or otherwise made accountable to the industry and consumers in some way.
- 5.8 Suggestions included amending the Code to make agents a class of participant (Genesis Energy and Vector), and establishing an agent accreditation regime (Contact Energy Limited Genesis and Trustpower). Other suggestions included requiring agents to certify that they have the requisite authorisation from a consumer (Nova Energy), or amending the Code to state that such authorisation constitutes reasonable grounds for a retailer to release the information for the purposes of the Privacy Act (Genesis).
- 5.9 Gentailers expressed concern that the proposal was insufficient to assure them that agents had a valid authorisation and so would not allow them to meet their privacy obligations in relation to information disclosures (Contact Energy Limited, ERANZ, Mercury, Genesis and Meridian/Powershop).

- 5.10 Genesis and Meridian felt that these concerns could be alleviated by the creation of further safeguards.
- 5.11 Flick Energy disagreed with the proposal. They felt the proposal provided very little benefit to consumers and that proposed information required would make it difficult for retailers to establish authorisation by other more reliable methods and create inefficiencies.
- 5.12 Other comments on the proposed amendment included:
- Consumers should have direct access to their own consumption data without having to rely on a retailer to provide it (Alan Barraclough).
  - The benefits to consumers are limited due to an information request needing approval for each individual consumer and the length of time for a retailer to communicate rejection of a request or provide the data once accepted (Consumer NZ).
  - The Code amendment should be based on the absolute minimum data required (taking into account the sensitivity of consumption data) and the timeliness of the transaction to enable the data to be used by consumers in a near real-time fashion (Cortexo).
  - The requirement for a customer's signature attracted criticism as being a poor means of verification (Flick Energy, Mercury and Vector), and an impediment for some consumers (Electric Kiwi, Vector and Vocus).
  - Further criteria should be specified for when an agent will be deemed to have authorisation from the customer (Contact Energy Limited), and consultation on the criteria should be sought from the Privacy Commissioner (Meridian/Powershop).
  - Authorisation should not be open ended as it leaves customers to proactively revoke authorisation and raises privacy concerns. A reasonable authorisation time may be a one year period (Energy Link) or a one to two year period (Trustpower).
- 5.13 Vector while agreeing with the Authority's objective disagreed with the Authority's proposal and felt that it creates barriers to a seamless consumer experience and real-time delivery of consumer benefits. Vector suggested an alternative model, which it believes would provide more effective authentication and authorisation processes, referred to as the "*OAuth style model*". Vector said that this model is based on a decentralised token-based authentication and authorisation model used by Government agencies both in New Zealand and overseas.
- 5.14 Meridian/Powershop also proposed detailed drafting changes to the proposed amendments.

***Views were spilt on the timeframes for authority to be accepted or rejected***

- 5.15 Submissions were divided between those that agreed with the proposed two business days timeframe for the communication of a rejection of an authority, those that considered it too long, and those that considered it too short.
- 5.16 Six submitters viewed the establishment of timeframes for communicating a rejection or revocation of an authority as an important measure to ensure the benefits of the changes will be realised (Cortexo, Network Waitaki, Transpower, Vocus and WEL Networks).



- 5.17 A further four submitters agreed that the imposition of a timeframe was important, but suggested that an almost instantaneous communication for any rejection was possible and preferable (emhTrade, Energy Link, Our Energy and Stephen Cope).
- 5.18 Two submitters disagreed with the proposed timeframes suggesting that it provided insufficient time to establish whether the request is properly authorised by the customer (Flick Energy and Nova Energy).
- 5.19 Mercury Energy disagreed with the proposal as they felt that it was less efficient than systems and processes they have already set up which allow customers to access their own data.
- 5.20 Contact Energy and Meridian/Powershop gave qualified support for the proposed timeframe dependant on the Authority first implementing further safeguards.

***Privacy and the protection of consumer data were key concerns for retailers***

- 5.21 As noted above submitters views on the interaction between the proposed amendment and the Privacy Act differed substantially.
- 5.22 Some agreed the proposals did not breach the obligations imposed by the Privacy Act (Network Waitaki, Our Energy and WEL Networks).
- 5.23 Two submitters qualified their agreement. Consumer NZ stated that they agree as long as a consumer actually agrees for the agent to access their information on their behalf. While the support of Genesis was premised on the Authority amending the proposed clause 11.32E to include an express Privacy Act acknowledgement that retailers may rely on as per Principle 11(d) of the Privacy Act.
- 5.24 A common theme among retailers and gentailers was the proposed information would not in all cases be sufficient to satisfy the retailer that the agent had proper authorisation from the consumer (Contact Energy Limited and Trustpower). This leaves retailers in a vulnerable position as final responsibility for the release of information rests with them (Flick Energy Limited and Trustpower).
- 5.25 Some submitters expressed concern that the proposals did not address the fundamental issue for retailers; ensuring that the consumer's consumption data is not going to be released to unauthorised persons (Nova Energy). If there is insufficient information received by a retailer that would satisfy the retailer's obligations under the Privacy Act (specifically, section 45), others considered that it will be challenging for retailers to comply with those obligations (Mercury Energy, Trustpower and Vector).
- 5.26 Mercury Energy felt the proposals do not provide an adequate basis for retailers to be satisfied as to the identity of the individual and the agent's authorisation. They also felt the proposals were not robust or consistent with the Privacy Act when compared with the verification process Mercury Energy has already established.
- 5.27 ERANZ encouraged the Authority to fully engage with its members to avoid the proposals eroding customer confidence in the industry resulting from insufficient protections of customer data.

***Industry recommended the Authority obtain an advisory opinion***

- 5.28 A number of submitters were supportive of the Authority's engagement with the Privacy Commission (Cortexo and emhTrade). Many felt that further consultation with the Privacy Commissioner (Meridian/Powershop), or the Authority seeking an advisory

opinion from the Privacy Commissioner, was needed prior to implementation (Flick Energy, and Genesis).

### ***Stakeholders were supportive of the Code amendment in their responses to the technical consultation***

- 5.29 The Authority's release of the 5 November 2019 technical consultation paper provided stakeholders the opportunity to provide comments on the changes to the drafting of the amendment to clause 11.32E of the Code in light of the advice from Victoria Casey QC.
- 5.30 Genesis and Meridian were supportive of the changes to clause 11.32E of the Code and put forward suggested drafting changes.
- 5.31 Mercury submitted that safeguards should be built into the process in order to give retailers the ability to verify agent authorisations to a standard that satisfies the retailer's own privacy requirements. Mercury suggested that this be achieved by the incorporation of its verification process into the Authority's amendments to clause 11.32E of the Code.
- 5.32 While somewhat comforted by the advice from Victoria Casey QC, Mercury indicated that they have continued reservations in particular regarding the assertions that privacy risks from unauthorised access to our customer data could be characterised as "negligible" and that the process proposed by the Authority erodes some of the protections Mercury currently has to protect customer consumption data.
- 5.33 Cortexo noted that the proposed Code amendment does not alter the 5 day timeframe for the provision of data which it considered too long where machine-to-machine communication exists.
- 5.34 Cortexo suggested that the proposed drafting of subclause 11.32EA(2) of the Code may create a "loop hole" which the Authority should address by making is very clear what is justifiable "further information" in terms of this subclause.

### **Authority decision**

- 5.35 The Authority:
- (a) confirms its view that amendments are required to clause 11.32E of the Code to streamline and standardise the process of authorisation
  - (b) acknowledges the concerns of submitters on the interaction of the amendments with the Privacy Act. On the basis of these concerns the Authority sought an independent legal opinion from Victoria Casey QC. This advice is attached at Appendix A
  - (c) has altered the proposed amendment to clause 11.32E of the Code to take into consideration submission, the advice of the OPC and legal opinion of Victoria Casey QC. The revised clause 11.32E is shown in Appendix A.

### ***We sought the Office of the Privacy Commissioners advice***

- 5.36 In light of the privacy concerns raised by submissions, the Authority approached the Office of the Privacy Commissioner (OPC) on whether the matters raised by stakeholders were suitable for an advisory opinion by the OPC.
- 5.37 The OPC's advice was that the issues did not appear to be suitable for an advisory opinion because the Privacy Act prevails over the Code in the statutory hierarchy (the Code not being an "enactment") so doesn't give rise to a point of interpretation.

### **Advice from Victoria Casey QC on the Code amendment and Privacy Act**

5.38 The Authority, after consulting with the OPC, asked Victoria Casey QC to provide a written opinion on the Privacy Act implications of the revised proposed Code amendments.

5.39 The opinion examined the privacy concerns of both agents and retailers (or any party holding personal information who is asked to share that information) namely:

- (a) for agents on behalf of consumers: that retailers are raising unreasonable barriers to customers' access to this information and/or delaying the disclosure of information;
- (b) for retailers: ensuring that they do not disclose information in breach of their obligations under the Privacy Act.

5.40 Victoria Casey QC concluded that:

*In my view, the proposed amended provisions will not place retailers in breach of their obligations under the Privacy Act.(...) that once these provisions are in place, retailers who require more onerous procedures from customers or agents are (absent special circumstances) at risk of contravening their obligations under Privacy Principle 6 and s 30 of the Privacy Act.<sup>5</sup>*

5.41 In addition to concluding that the Code amendment would not put retailers in breach of their Privacy Act obligations the advice noted:

- (a) the access right is fundamental to an individual's ability to exercise control over their own personal information and that this right to access is established by Privacy Principle 6
- (b) the Privacy Act requires the retailer to comply with a request regardless of the form in which it is made
- (c) retailers raising unreasonable barriers to customer's access to their information raises issues of potential non-compliance by the retailers of their obligations under Privacy Principle 6
- (d) Section 45 of the Privacy Act may not be used to frustrate or hinder an access request
- (e) the importance of Section 45 of the Privacy Act not being applied to have the effect of hindering access to personal information is confirmed by section 115 of the Privacy Act
- (f) what is a reasonable precaution and what is an unjustifiable constraint on the exercise of an individual's right of access will depend on what is reasonable and proportionate in the circumstances
- (g) where the agent is a known and reputable member of the industry who routinely acts for consumers in this role, the risk of the request not being properly authorised is very low, and the consequences to the customer of a mistake are negligible.

5.42 The advice from Victoria Casey QC was published by the Authority alongside the 5 November 2019 technical consultation paper.

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<sup>5</sup> Victoria Casey QC, Proposed amendments to the Electricity Industry Participation Code: Implications of the Privacy Act p6 October 2019

### ***Our decision strikes a balance between timeliness and privacy protections***

- 5.43 The Code amendment sets an appropriate minimum expectation, in terms of timeliness and process, for providing consumer data to agents. It balances off the need for a standardised efficient and effective mechanism for requesting data, with legitimate protections of that data, consistent with the Privacy Act. The Authority notes that it is likely to be a breach of the Privacy Act for a retailer to refuse to provide a consumer's historical consumption data to that consumer's agent, unless there are grounds under the Privacy Act for refusing to provide the information.
- 5.44 Retailers can be confident that they will not breach the Privacy Act by following the Code provisions when delivering data to an agent because:
- (a) they will have greater assurance that agents will have proper authorisation from consumers by introducing a proxy accreditation scheme for agents (as described above)
  - (b) the drafting enables retailers to decline a request if they consider it would breach the Privacy Act for them to provide the information
  - (c) section 115 of the Privacy Act protects retailers from both civil and criminal proceedings where data is provided in good faith in accordance with Privacy Principle 6. The Office of the Privacy Commission has confirmed the protections offered by this clause. The decisions also establish a data request/delivery process which retailers can rely on in good faith
  - (d) the Privacy Bill currently before Parliament includes provisions (section 212) which criminalise a party fraudulently obtaining of personal information (ie liable to be convicted and fined \$10,000 per offence). If introduced, an agent obtaining consumption data without consumer consent faces criminal proceedings.

### ***Electronic signatures can take many forms and have legal standing***

- 5.45 The Authority notes the concerns of submitters regarding the use of electronic signatures. Electronic signatures can take many forms including a scanned image of the signature, a mouse mark on a screen or a person agreeing to the terms and conditions by ticking a box on a web form which provides that the person ticking the box agrees to be bound by all the relevant terms.
- 5.46 Given the variety of forms electronic signatures can take and the legal basis for their use, the Authority has retained the use of electronic signatures in the revised Code amendment. Further, the proposed amendment allows evidence of a customer's authorisation to be provided in other ways than by an electronic signature.

### ***Consumers and retailers can have confidence that their data is protected***

- 5.47 Consumers and agents can have greater confidence than at present that information is not being withheld for improper reasons and that requests will be dealt with expeditiously because:
- (a) if agents use the form specified, the only grounds for a retailer to refuse to provide the information requested are
    - (i) (where the customer is an individual) providing the information would breach the Privacy Act or the information the retailer believes on reasonable grounds that the consumer has not provided authorisation or

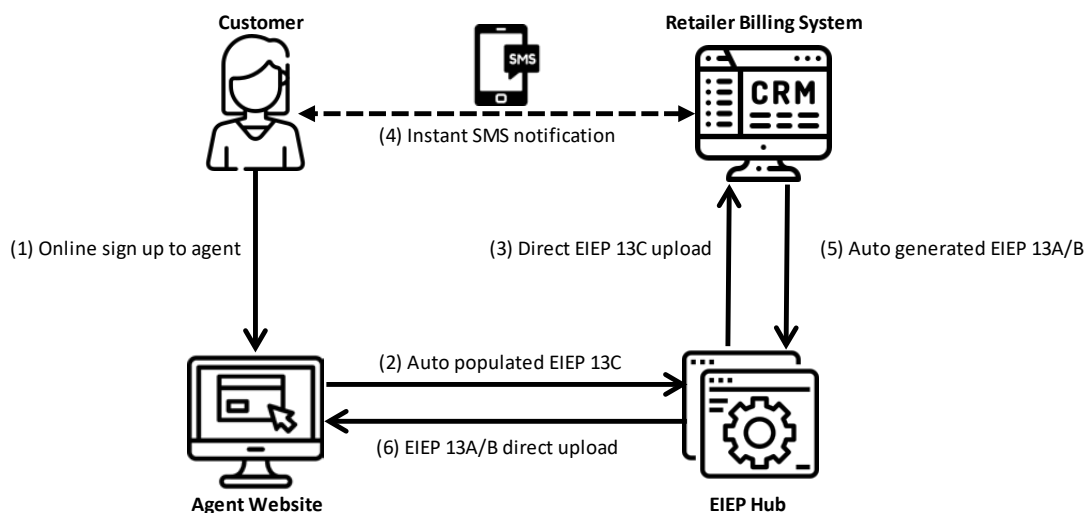
- (ii) (in all cases) the retailer believes on reasonable grounds that some of the information in the authorisation form is not materially correct, such that the retailer cannot be satisfied of the preceding two matters or is unable to identify the property, account or ICP or ICPs that the request relates to.
  - (b) before refusing a request on any of these grounds, the retailer must consider whether any further information could reasonably be provided by the agent to satisfy the retailer and, if so, give the agent an opportunity to provide that information.
  - (c) the amendment requires retailers to make reasonable endeavours to provide information within specified timeframes. These reasonable endeavour obligations are consistent with the requirement under the Privacy Act that decisions on requests be made as soon as reasonably practicable, and set an outer limit timeframe of 20 working days (unless extended for the reasons set out in the Privacy Act). There is also nothing to prevent a retailer responding in a shorter time period than the reasonable endeavour timeframes set in the proposed amendment.
- 5.48 The Code amendment does not prevent retailers from accepting other forms of authorisation of agents or other evidence of that approval, or from disclosing consumer data more quickly. However, retailers cannot refuse to accept authorisations given in the form specified in the proposed amendment merely because it does not comply with the retailers' proposed form or follow their proposed system. The Authority intends to monitor logs and reasons for rejections to ensure that retailers are providing data consistent with the Code amendment. The Authority would look to making further amendments to the Code if it considered reasons for rejections were unreasonable and being used by retailers to avoid providing data.

***Setting the benchmark for what is “reasonably practicable”***

- 5.49 Contact highlighted a perceived discrepancy between the proposed Code amendment and section 40.1 of the Privacy Act. This clause states that *“the agency to which an information privacy request is made or transferred in accordance with this Act shall, as soon as reasonably practicable, and in any case not later than 20 working days after the day on which the request is received by that agency.”*
- 5.50 The view of the Authority is that *“as soon as reasonably practicable”* is the relevant test under section 40.1 of the Privacy Act. Our opinion is that within the electricity industry context it is *reasonably practicable* for rejections to be communicated within two business days and for information to be transferred with five business days. The two-day timeframe has therefore been retained.
- 5.51 If a retailer considers that there are grounds for refusing the request the retailer must, before refusing the request it must consider whether any further information could reasonably be provided by the agent to satisfy the retailer. It must request any such further information from the agent within 2 business days of receiving the request.
- 5.52 The Code amendment reinforces the 5 business day limit for the retailer to provide consumer historic consumer data to a consumer or their agent under clause 11.32B. This 5 business day deadline commences at the receipt of the request from the agent and is inclusive of the 2 business day limit for the rejection of the request where the EIEP Hub is used.

- 5.53 The Authority intends to monitor logs of the timeframe for when retailers provide consumer historic consumption data under clause 11.32A. If this indicates that consumption data is mainly being provided at the 5-day limit, implying that provision of data is deliberately being delayed, the Authority will consider reducing the timeframe within which the data must be provided under clause 11.32A.
- 5.54 As technology continues to evolve so too will expectations of what is reasonably practical. Some submitters agreed that the imposition of a timeframe was important, but suggested that an almost instantaneous communication for any rejection was possible and preferable (emhTrade, Energy Link, and Stephen Cope, Cortexo).
- 5.55 An example of how a near instantaneous process for the communication and response to data request could be possible using the EIEP Hub is shown in Figure 2. Given this potential for a near instantaneous process, the Authority intends over time to reduce the maximum timeframe within which data must be provided to less than 5 days. This is so that the maximum timeframe better reflects the technological capability to provide data.

**Figure 2: An automated process for data requests and responses using the EIEP Hub**



Icons from [www.flaticon.com](http://www.flaticon.com)

## 6 Decision: Develop an API for communication of authorisation

### Authority proposal

- 6.1 The Authority identified that the industry's piecemeal approach to communication of an authorisation of an agent has resulted in the duplication of processes and effort and has given rise to unnecessary transaction costs. These inefficient transaction costs have stymied innovation and greater consumer participation in the industry.
- 6.2 Anecdotal evidence also suggested that some authorisations were being rejected by retailers because they are not provided using that retailer's proprietary format or system.



- 6.3 To address this issue the Authority proposed to establish an API for the communication of the receipt of authorisations between a customer's authorised agent and their responsible retailer.
- 6.4 The Agent Authorisation API was to:
- (a) create a portal for communicating the receipt of an authorisation by an agent to the retailer
  - (b) provide the responsible retailer notice of the authorisation in a machine-readable format
  - (c) utilise the Authority's existing API infrastructure and to require agents to subscribe and agree to the Authority's standard terms and conditions.
- 6.5 The Authority indicated that it would amend the Code to mandate the use of the agent authorisation API, if this consultation process indicated that the benefits of the proposal would not be realised if the use of the API was voluntary.

### **Submitters' views**

- 6.6 The establishment of an Agent Authorisation API was well supported, with many submitters agreeing it would create an efficient process for communicating authorisations, rejections, and revocations, between retailers and agents that will be of benefit to all parties.
- 6.7 A number of retailers (Flick Energy, Contact Energy and Nova Energy) felt that qualification was needed for their agreement. These qualifications included that agents would first need to be regulated in some way to provide reassurance to retailers on the validity of an agent's claimed authorisation.
- 6.8 Nova Energy expressed only limited support, saying that an API should be used only if it proves to be the best methodology.
- 6.9 Genesis felt the establishment of a new API would introduce complexity for little value and proposed that a simpler, more cost-effective solution would be to leverage the Authority's current EIEP system by amending it to require the proposed authorisation data.
- 6.10 Meridian/Powershop considered that the benefits of establishing the API needed to be fully assessed on the basis of its incremental benefits.
- 6.11 Mercury Energy disagreed with the establishment of the proposed API due to it being complimentary to the Code amendment.
- 6.12 Some submitters raised concerns over the mandating the use of the API. Nova Energy suggested that mandating the API may have the unintended consequence of stifling innovation by industry participants as technology changes.
- 6.13 Flick suggested mandating the API would create obstacles to customers requesting data through other means and should therefore only be relevant when the request is between an agent and a retailer.

### ***Stakeholders responses to the technical consultation suggested amendments***

- 6.14 Our Energy commented that it was concerned with Authority's choice to use of the existing EIEPs rather than the create a standalone API for authorisations as it appeared to let market participants 'off the hook'.

- 6.15 Mercury submitted that where a retailer's process requires a security token, it should be mandatory for an agent to use the existing but conditional "Consumer Authorisation Code" field in EIEP 13C to provide this token to the retailers. It noted that the failure to provide the Consumer Authorisation Code would result in the retailer requesting the agent provide further information.
- 6.16 Mercury also stated that without the Consumer Authorisation Code, it would require the agent to provide a copy of the Schedule 11.6 Form of Authorisation with every request.
- 6.17 Mercury did not support the inclusion of the Authority expiry date field into EIEP 13C as it believes it would create additional work for retailers.
- 6.18 Cortexo commented that there is an implication that, via the Customer Authorisation Code, a retailer can require an additional identification code from a consumer such as a unique code only available by contacting the retailer or via an online customer portal. They noted that this would create unnecessary barriers to data access, and be contrary to the legal opinion provided Victoria Casey QC and to the purpose of having one streamlined process.
- 6.19 Contact supported the changes but recommended that there be no overlap in operation of the existing and revised EIEP 13C and that there be a 3 month roll out period for the new EIEP 13C.

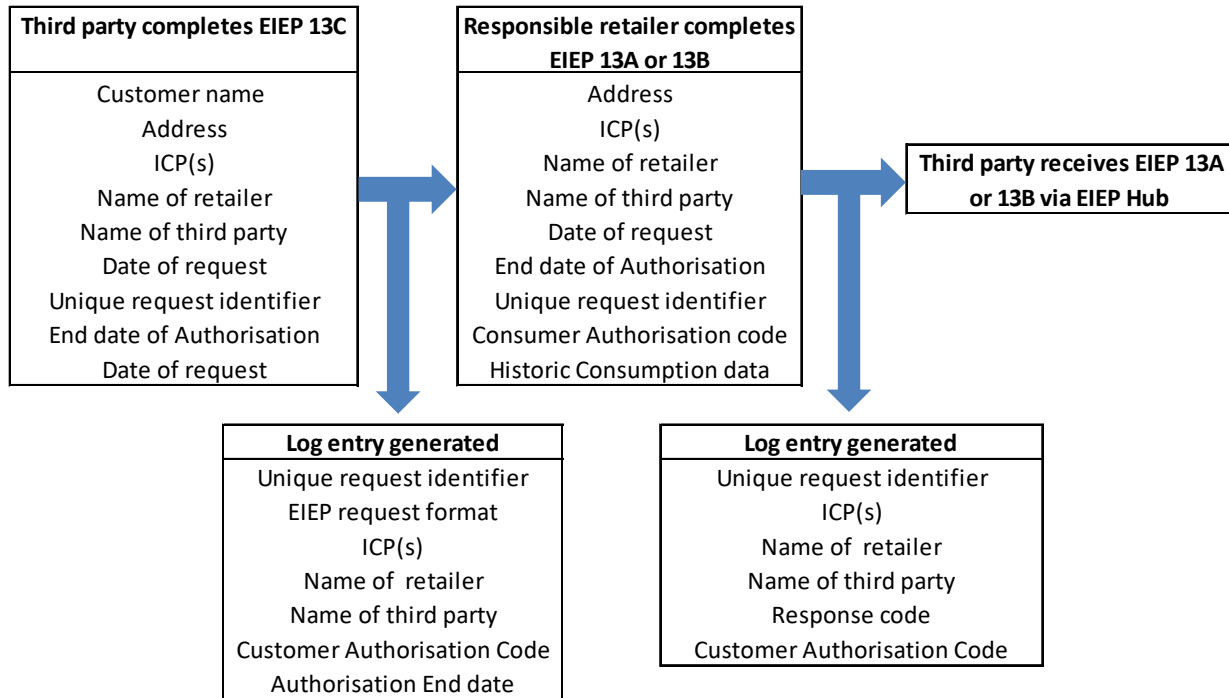
### **Authority decision**

- 6.20 The Authority has decided to:
- (a) amend the existing EIEP 13C, 13A and 13B to standardise and streamline the communication of an authority
  - (b) mandate the use of the EIEP Hub for the transfer of EIEPs 13C, 13A and 13B between retailers and agents (currently optional)
  - (c) log details of each EIEP 13C, 13A and 13B transferred through the EIEP hub to monitor compliance with the Code.
- 6.21 The Authority acknowledges stakeholders' feedback and has altered the means of implementation to utilise the existing suite of EIEPs as suggested by Genesis.
- 6.22 The Authority's view is that the benefits of the use of the of existing EIEPs 13C, 13A and 13B include that this approach:
- (a) has lower development cost
  - (b) leverages off existing systems and processes
  - (c) is quicker and less risky to implementation
  - (d) limits changes to existing agent and retailer systems.
- 6.23 The benefits in taking this approach outweigh the minor limitations on customisation imposed by this approach as suggested by Our energy.
- 6.24 The decision to mandate the use of the EIEP Hub for the transfer of EIEPs 13C, 13A and 13B will standardise and streamline the data request and provision process. This, combined with new EIEP Terms and Conditions for Use (see below), will mitigate retailer's concerns over customer data falling into the wrong hands.



- 6.25 In addition to its use for the communication of an authority, the EIEP hub also provides a secure, streamlined means for agents to provide a copy of a written authority to the retailer in line with clauses 11.32E or 11.32ED of the Code.
- 6.26 The use of EIEP 13C will remain voluntary where the request for information comes directly from the consumer.

**Figure 3: Information flows using the EIEP Hub**



- 6.27 The process will be updated to log key details of EIEPs 13C, 13A and 13B as shown in Figure 3. The Authority will not log personal information such as customer names or a customer’s historic consumption data.
- 6.28 The amendments to EIEPs 13C, 13A and 13B are shown in Table 2 below. Marked up copies of each EIEP can be found at Appendix B.

**Table 2: Amendments to EIEPs**

EIEP	Field	Change
13C	General requirements	EIEP13A and EIEP13B responses to a valid EIEP13C must be provided via the EIEP hub
13C	EIEP delivery method	Use of the data hub to respond to an EIEP is no longer optional therefore field to be removed
13C	Email address	Email delivery no longer permitted. Field to be removed
13C	Authority expiry date	New field: Event Data: Authority end date Format: DD/MM/YYYY Optional/Mandatory: M Validation Rule: The end date of the authority can be no more than 24 months after application date

EIEP	Field	Change
13C	Consumer authorisation code	Modification to validation rule to clarify that authorisation code is only required when both the retailer and agent agree to its use.
13C	Statement of written authority	New field: Event Statement of written authority Format: Char 3 Optional/Mandatory: M Validation Rule: Must be YES or NO
13A	Business requirements 2	The use of the EIEP Hub by agents to submit an EIEP13C will become mandatory. Therefore the following will text will be removed from the field. <i>“However nothing prevents an agent requesting EIEP 13B via a valid email address and receiving a response to that valid email address.”</i>
13A	Response code	Two new response codes added to validation rules to allow retailers to detail the reason for the rejection of a request.
13B	Business requirements 2	The use of the EIEP Hub by agents to submit an EIEP13C will be mandatory. Therefore the following will text will be removed from the field. <i>“However nothing prevents an agent requesting EIEP 13B via a valid email address and receiving a response to that valid email address.”</i>
13b	Response code	Two new response codes added to validation rules to allow retailers to detail the reason for the rejection of a request.

6.29 Two new fields are added to EIEP13C:

1. Authority expiry date. This will be used by third parties to indicate the expiry date of the authorisation. To ensure that customer authorisations remain current the expiry date may be no longer than 24 months from the receipt of the authority.
2. Statement of written authority. This field requires a requester to state if they have obtained a written authority from the consumer in the form and containing the information required by Schedule 11.6 of the Code.

6.30 To ensure that participants likely to be affected by the changes to EIEPs 13A, 13B and 13C, were fully abreast of the changes the Authority conducted a limited consultation on the amendments in October 2019.

6.31 A limited consultation was chosen to reflect limited nature of the changes to EIEP 13C. The Authority viewed changes to EIEP13A and EIEP13B as technical or non-controversial and was therefore not obliged to consult on these changes.

6.32 Stakeholders provided comment on the changes, which were taken into account where relevant.

6.33 The Authority disagrees with Contact's call for the use of the Customer Authorisation Code to be mandatory as it conflicts with Victoria Casey QC's advice "that if an agency had a policy of refusing to disclose personal information unless the request was made in a certain form or accompanied by certain identification requirements on the grounds that

this was the only way the agency could be satisfied that the information would go to the correct individual would most likely be in breach of section 30 and Principle 6."<sup>6</sup>

- 6.34 The Authority shares Cortexo's concerns that retailers may use the Customer Authorisation Code field to frustrate the data exchange process by imposing an unnecessary hurdle to a consumer's wishes being fulfilled.
- 6.35 The Authority has altered validation rules for the Customer Authorisation Code field in EIEP 13C to make it optional for an agent to provide a retailer's security token. It has however also amended EIEP13C to make it clear that the provision of such a token is neither mandatory nor a ground for rejecting a request.

## 7 Decision: Third party accreditation and approval protocol

### Authority's proposal

- 7.1 Incorporated into the 23 April 2019 consultation paper's proposal to introduce an Agent Authorisation API was a requirement for agents to subscribe and agree to the Authority's standard terms and conditions for access to the existing API.

### Submitters' views

- 7.2 Many retailers submitted that an accreditation regime for third party agents should be established by the Authority (Genesis, Contact, Trustpower, and Flick).
- 7.3 Contact submitted that such a regime would provide assurance to retailers that they are dealing with reputable agents.
- 7.4 Contact suggested that the Authority should amend the EIEP Hub Terms and Conditions for Use to require agents to warrant that, by their use of the EIEP Hub, they have authorisation to request personal information on behalf of customers, and that they are in possession of an authorisation from the consumer that a retailer may request at any time.
- 7.5 Contact also proposed that the EIEP Hub Terms and Conditions for Use grant the Authority the power to conduct regular audits to confirm agents are complying with their obligations and the Code.
- 7.6 Trustpower proposed that a list of accredited third parties may also be included on the Authority's website or on the *What's My Number* platform. To make it easier and safer for consumers to know when they are engaging with reputable entities and help them make informed choices.
- 7.7 Flick supported the establishment an accreditation regime for agents, to ensure the agents are operating in the best interests of consumers and compliant with the Code. They state that this will relieve retailers from the responsibility of determining the validity of the agents and increase efficiency in the data delivery process.

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<sup>6</sup> Victoria Casey QC, Proposed amendments to the Electricity Industry Participation Code: Implications of the Privacy Act p3 October 2019

## **Our decision**

- 7.8 In response to submitters' feedback the Authority has decided to incorporate an accreditation and approval process into the EIEP Hub Terms and Conditions of Use.
- 7.9 The view of the Authority is that this is an effective confidence building measure that provides assurance to retailers and consumers that they are dealing with reputable agents.
- 7.10 We considered a range of different approaches to building an accreditation and approval framework whereby third parties can become trusted partners with retailers.
- 7.11 The approaches considered were:
1. Australian Accredited Data Recipient
  2. Regulatory regime
  3. Mandatory contractual arrangements
  4. EIEP Hub Terms and Conditions for Use reform
  5. Negative licensing
  6. Voluntary accreditation
  7. Certified Reconciliation Participant.
- 7.12 We assessed these options against the following criteria:
- (a) costs imposed on agents by an accreditation regime
  - (b) reputation risk for retailers if an accredited agent acted inappropriately under an accreditation regime
  - (c) reputation risk for the Authority if an accredited agent acted inappropriately under an accreditation regime
  - (d) set up and operational costs imposed on the Authority
  - (e) the ability of the Authority to impose consequences on agents which do not act appropriately
  - (f) difficulty of implementing an accreditation regime.

### ***Assessment Overview:***

- 7.13 The Authority's assessment found that updating the EIEP Hub Terms and Conditions for Use provides the best balance between the decision criteria. It addresses the reputation risk for retailers without imposing undue costs on agents and the Authority.
- 7.14 Drawing on this assessment the Authority has decided to implement a regime that:
- (a) adopts the key components of the Australian Accredited Data Recipient model
  - (b) incorporates these components into the contractual terms we will impose on non-participants seeking access to the EIEP hub
  - (c) maintains a public record of non-participants who have been approved for access to the EIEP hub.

### ***Revised EIEP Hub Terms and Conditions for Use***

- 7.15 The revised EIEP Hub Terms and Conditions for Use will feature:

- (a) the ability of the Authority to revoke agents' access to the EIEP hub for breaches poor behaviour
  - (b) a requirement for agents to warrant that they hold a valid customer authority, in scope and duration, for each request in accordance with all Privacy Act and Code requirements
  - (c) a requirement to not use provided data in a way not consented to by the consumer, or in order to provide goods and services that the consumer has not agreed to
  - (d) a right for the Authority to:
    - (i) conduct an audit, request evidence or otherwise investigate if an EIEP Hub user has breached of the Terms and Conditions for Use including submitting an EIEP 13C data request without a valid customer authority
    - (ii) restrict or terminate access to the EIEP Hub in the event that we consider that an agent has breached the Terms of Use.
- 7.16 To be granted access to the EIEP Hub third parties will have to complete an application and must:
- (a) Warrant that they are a fit and proper person to manage personal information
  - (b) take the steps to protecting the personal information from
    - (i) misuse, interference and loss
    - (ii) unauthorised access, modification or disclosure
  - (c) have internal dispute resolution processes
  - (d) be a voluntary member of Utilities Disputes
  - (e) have adequate insurance, or a comparable guarantee, in light of the risk of consumers not being properly compensated for any loss that might reasonably be expected to arise from a breach of obligations under any law relevant to the management of personal information.
- 7.17 The Authority intends to publish the revised EIEP Hub Terms and Conditions for Use in February 2020.
- 7.18 The EIEP Hub Terms and Conditions for Use will apply to both non-participants and participants.

## 8 Decision: Inclusion of additional fields into the ICP Connection Data API and My Meter website

### Authority proposal

- 8.1 In response to feedback from users of the ICP connection data API that it would be useful to add further fields to the API and web portal. The Authority proposed to add the following Registry fields to both the ICP connection data API and My meter portal:
- (a) address property name
  - (b) Australian and New Zealand Standard Industrial Classification (ANZSIC) code
  - (c) switch status.

### **Submitters' views**

- 8.2 The inclusion of the three additional registry fields into the ICP Connection Data API was well supported (Energy Link, Genesis Energy, Network Waitaki, Nova Energy, Our Energy and WEL Networks).
- 8.3 Submissions noted the fields will allow agents to tailor their service offerings and provide assurance that the consumer or agent is dealing with the correct ICP (Contact Energy) and will reduce the number of procurement related questions (Energy Link).
- 8.4 Meridian/Powershop and Orion noted that the Address property name field currently contains some data that should not be disclosed, including names of natural persons, which should be reviewed and deleted prior to the data being made available.
- 8.5 Powerco questioned the benefits expected from the inclusion of the three fields and suggested that their inclusion contrary to the Authority's previously expressed view on use of registry data contained in its memorandum *Use of the registry for non-Code purposes* 17 September 2014.
- 8.6 Similarly, Mercury Energy submitted that the addition of the fields may only serve to enable scraping of the registry for marketing purposes.
- 8.7 Flick submitted that customers are already aware of the information contained in the fields and so are able to provide it directly to their agents rather than it be requested from retailers.

### **Additional fields were suggested by submitters**

- 8.8 Alan Barraclough suggested that the *My Meter* portal should allow a consumer to authorise who has access to their consumption data, and that provision should be made, through an API, to allow consumers to download their consumption data themselves.
- 8.9 Network Waitaki also suggested that half-hourly smart meter data should be optionally available if the ICP owner requests and agrees to it.
- 8.10 Cortexo submitted that all registry information should be available unless the information breached the Code or law.
- 8.11 Meridian/Powershop and Nova Energy suggested the inclusion of a field containing the ICP creation date and/or the date when ownership of an ICP took effect. Nova Energy suggested that without this information, situations may arise where information is provided to parties that were not the contracted party or representative of the contracted party at the time the information request covers.
- 8.12 The inclusion of the Profile code field was suggested by both Meridian/Powershop and Energy Link.
- 8.13 Meridian/Powershop also suggested that two metering fields, the Metering component and Settlement indicator fields be added.

### **Our decision**

- 8.14 The Authority has decided to include the following registry fields in the ICP Connection Data API and My Meter website:
- (a) Address property name (available only where this has been populated by the distributor)
  - (b) ANZIC code

- (c) initial electrical connection date (note that the Code does not require this field to be populated for ICPs created before 29 August 2013)
  - (d) meter certification expiry date
  - (e) meter settlement indicator (note that the registry does not indicate what retail rates are applied by the retailer, this field is only relevant to the programming of meter registers that may or may not be used in the settlement and invoicing processes)
  - (f) metering component type
  - (g) profile code
  - (h) switch status (Trader switch in progress).
- 8.15 Because of the presence of the personal details of some past and/or present consumers in the address property name field we have opted to delay the inclusion of this field until 1 March 2020.
- 8.16 During this period the Authority will write to all distributors and request that:
1. personal information is deleted from registry address fields
  2. property names be updated where applicable.
- 8.17 In response to concerns that adding registry fields to the ICP Connection API would result in it being used for the marketing purposes which is prohibited by the terms of access for use of the registry. The Authority notes that the registry access policy states that it *“does not apply to registry users’ access to the ICP Connection Data API” or to the use of data obtained from that source*<sup>7</sup>. Therefore, there is no conflict between the inclusion of the fields above in the ICP Connection Data API and clause 4.2 (iii) of the Registry Access Policy.
- 8.18 Several of the submitters requested that information be made available via the ICP connection data API that is not currently held in the registry. This data includes:
- (a) user group (Low/Standard)
  - (b) trader history
  - (c) consumption data
- 8.19 As this information is not held in the registry it cannot be made available via the ICP connection data API.
- 8.20 While trader history is not directly recorded in the registry similar information is available in the registry field trader last changed which indicates the date of the last trader change at an ICP.
- 8.21 We consider that the addition of the Trader last changed field will add value from a public policy and industry efficiency perspective. It will allow consumers and other users to easily identify when the ICP last changed trader.

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<sup>7</sup> Electricity Authority, Registry Access Policy Version 1.7 April 2019 p.E available at <https://www.ea.govt.nz/dmsdocument/17110-registry-access-policy-terms-and-conditions>

## Appendix A Revised Clause 11.32E

### Clause 1.1 amended (Interpretation)

In clause 1.1(1) insert in their appropriate alphabetical order:

**electronic signature** has the meaning given to it in section 209 of the Contract and Commercial Law Act 2017

**EIE System** means an Electricity Information Exchange System being any system prescribed by the Authority under clause 11.32EG.

### Clause 11.32E amended (Agents)

In Clause 11.32E:

- (a) after clause 11.32B insert on behalf of the **consumer**.
- (b) after a **retailer** must replace treat a request from the agent as if it were a request from the **consumer**, if the agent has the written authority of the **consumer** to obtain the information or is otherwise properly authorised by that **consumer** to obtain the information with deal with any request from the agent for information about the **consumer** under clause 11.32B in accordance with:
  - (a) clauses 11.32A and 11.32EB;
  - (b) clause 11.32ED, if a request:
    - (i) includes a statement from the agent that the agent has obtained, or the request is accompanied by, a written authority from the **consumer** in the form and containing the information required by Schedule 11.6; and
    - (ii) the request is made through the **EIE System**; and
  - (c) the Privacy Act 1993, where applicable.

### New clauses 11.32EA to 11.32EG inserted

After clause 11.32E, insert the following new clauses:

#### **11.32EA Retailer actions on receipt of requests from agents**

- (1) A **retailer**, after receiving a request under clause 11.32B from an agent on behalf of a **consumer**, must:
  - (a) make a decision on the request, and advise the agent of that decision, as soon as reasonably practicable; and
  - (b) provide the information requested within the timeframe required by clause 11.32B unless there are grounds for refusing the request under clause 11.32EB.
- (2) If the **retailer** considers, in accordance with subclause (1), that there are grounds for refusing the request, the **retailer** must, before refusing the request:
  - (a) consider whether any further information could reasonably be provided by the agent to satisfy the **retailer**; and
  - (b) request any such further information from the agent, specifying the further information required in detail.
- (3) If further information is provided under subclause (2)(b), the **retailer** upon receiving the further information must:
  - (a) make a final decision on the request, and advise the agent of that decision, as soon as reasonably practicable; and



- (b) provide the information requested within the timeframe required by clause 11.32B as calculated from the time the **retailer** receives the further information, unless there are grounds for refusing the request under clause 11.32EB.
- (4) If a **retailer** decides to refuse a request, in advising the agent of that decision, the **retailer** must:
  - (a) indicate the ground or grounds under clause 11.32EB(1) that the **retailer** is relying on to refuse the request; and
  - (b) provide the agent with the detailed reasons as to why that ground or grounds applies or apply.
- (5) If a **retailer** decides to grant a request in full, the **retailer** meets the obligation to advise the agent of that decision by providing the information to the agent in accordance with subclauses (1)(b) and (3)(b).
- (6) The obligations in subclauses (1)(a) and (3)(a) do not detract from the obligations in subclauses (1)(b) and (3)(b), respectively.

#### **11.32EB Decisions on requests**

- (1) A **retailer** that receives a request under clause 11.32B from an agent on behalf of a **consumer** must grant the request and provide the information unless the **retailer** believes on reasonable grounds:
  - (a) that the **consumer** has not authorised the request;
  - (b) that complying with the request would otherwise cause the **retailer** to breach its obligations under the Privacy Act 1993 (where it applies); or
  - (c) that:
    - (i) if the request is accompanied by a written authority in the form and containing the information required by Schedule 11.6 or the agent subsequently provides a copy of such an authority, any of the information required by Schedule 11.6 is incorrect in a material way, such that the **retailer** cannot be satisfied of the matters in paragraphs (a) or (b) or is unable to identify the **consumer** the request relates to; or
    - (ii) in any other situation, the **retailer** is unable to identify the **consumer** the request relates to.
- (2) A **retailer** may not refuse a request under clause 11.32B from an agent on behalf of a **consumer** on the basis that the request or any authorisation relating to the request is not in a particular form, or does not follow a particular process.

#### **11.32EC Requirements for agents who are participants**

- (1) This clause applies to each **participant** who wishes to make or who makes a request for information to a **retailer** under clause 11.32B as an agent on behalf of a **consumer**.
- (2) Before making the request, the **participant** must obtain an authorisation from the **consumer** for the **participant** to request the transfer of the information to the agent on behalf of the **consumer**.
- (3) The **participant** must:
  - (a) retain a copy of the authorisation under subclause (2) or otherwise retain evidence that the **consumer** has provided the authorisation required by subclause (2); and
  - (b) provide a copy of the authorisation or other evidence to the **retailer**, if requested by the **retailer**.

**11.32ED Additional requirements on retailers for authorisations in prescribed form and requests received through the EIE System**

- (1) This clause applies where an agent requests information from a **retailer** on behalf of a **consumer** under clause 11.32B and:
  - (a) subject to clause 11.32EE, either:
    - (i) the request includes a statement from the agent that the agent has obtained a written authority from the **consumer** in the form and containing the information required by Schedule 11.6 (being an authority that remains in force at the date the request is made); or
    - (ii) the agent separately provides a written authority in the form and containing the information required by Schedule 11.6 or a copy of such a written authority (being an authority that remains in force at the date the request is made); and
  - (b) the request is made through the **EIE System**.
- (2) If this clause applies:
  - (a) the **retailer** must use all reasonable endeavours to take the steps in clauses 11.32EA(1)(a) and 11.32EA(2), as applicable, within 2 **business days** of the later of:
    - (i) receiving the request; or
    - (ii) receiving a copy of a written authority under subparagraph (1)(a)(ii); and
  - (b) where clause 11.32EA(3) applies, the **retailer** must use all reasonable endeavours, within 2 **business days** of receiving further information from the agent, to take the steps in clause 11.32EA(3)(a).
- (3) Where clause 11.32EA(2) applies, the request may include a request that the agent provide a copy of the written authority referred to in subclause (1)(a), if not provided with the request.
- (4) If a request is made through the **EIE System**, but the **retailer** believes on reasonable grounds that the request does not meet the requirements of the **EIEP**, subclauses (2) and (3) do not apply but, for the avoidance of doubt, the **retailer** must still comply with clauses 11.32B, 11.32EB and 11.32EC.

**11.32EE Requirements for written authorities under Schedule 11.6**

- (1) Each written authority, for the purposes of clause 11.32ED, must include or be accompanied by:
  - (a) if the **consumer** is an individual (being a natural person), an **electronic signature** or physical signature of the **consumer** or of a person on behalf of the **consumer** (in which case, evidence of that person's authority to sign on behalf of the **consumer** is required) or other evidence that the **consumer** has approved the authority; or
  - (b) if the **consumer** is not an individual (not being a natural person), an **electronic signature** or physical signature of an authorised representative of the **consumer** or other evidence that the **consumer** has approved the authority.
- (2) Each **electronic signature**, for the purposes of subclause (1), must meet the requirements of sections 226 and 228 of the Contract and Commercial Law Act 2017.

**11.32EF Revocation of authority**

- (1) If a **retailer** receives notification from a **consumer** that the **consumer** has revoked an authority, the **retailer** must notify the agent within 2 **business days** of receiving the notification that the authority is revoked.

- (2) If an agent that is a **participant** receives notification from a **consumer** that the **consumer** has revoked the agent's authority, the agent must notify the **retailer** within 2 **business days** of receiving the notification that the authority is revoked.

**11.32EG Authority may prescribe EIE System**

- (1) The **Authority** may prescribe a system for the purpose of clauses 11.32E to 11.32ED for the:
  - (a) exchange of information between **participants**;
  - (b) the provision of information by **participants** to other **participants** or other persons;  
and
  - (c) the making of requests for information by **participants** or other persons to **participants**.
- (2) The **Authority** must advise **participants** and other parties of any system it prescribes under subclause (1) by posting a notice of the prescribed system on the **Authority's** website.

**New Schedule 11.6 inserted (Forms for authorisation of an Agent to request consumption information)**

After Schedule 11.5, insert the Schedule 11.6 set out in Schedule 1 of this amendment.

# Schedule 1

## **New Schedule 11.6 inserted Forms for authorisation of an Agent to request consumption information**

### **Form 1: Form for authorisation by an individual (being a natural person)**

Consumer: [Consumer full name]

Property: [property address (es)]

Customer number<sup>8</sup>: [customer number]

Installation Control Points (ICP(s)) Identifier(s): [List all ICPs]

Retailer: [name of Retailer]

Agent: [full name of Agent and contact details]

Period of authority: [enter period of authorisation to Agent]

I (being the Consumer named above) confirm that I own or occupy the Property identified above (or owned or occupied that property at the relevant time) or otherwise am or was responsible for the consumption of electricity at the Property.

I confirm that I am or have been a customer of the Retailer identified above in relation to the Property and ICP(s) identified above.

I authorise:

- (a) the Agent identified above to request, receive and hold information on my behalf about electricity consumption for the Property or the ICP(s); and
- (b) the Retailer to transfer information on my behalf about electricity consumption for the Property or ICP(s) to the Agent.

[Signature/electronic signature of Consumer or of a person on behalf of the Consumer (in which case, evidence of that person's authority to sign on behalf of the Consumer is required) or other evidence of Consumer's agreement]

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<sup>8</sup> This is the customer number assigned to the Customer by the Retailer to whom the request is being made.

**Form 2: Form for authorisation by a non-individual (not being a natural person)**

Consumer: [Consumer full name]

Authorised Representative of Consumer: [Full name and title/position with Consumer]

Property: [property address (es)]

Customer number<sup>9</sup>: [customer number]

Installation Control Points (ICP(s)) Identifier(s): [List all ICPs]

Retailer: [name of Retailer]

Agent: [full name of Agent and contact details]

Period of authority [enter period of authorisation to Agent]

The Consumer identified above owns or occupies the Property identified above (or owned or occupied that property at the relevant time) or otherwise is or was responsible for the consumption of electricity at the Property.

The Consumer is or has been a customer of the Retailer identified above in relation to the Property and, ICP(s) identified above.

The Consumer authorises:

- (a) the Agent identified above to request, receive and hold information on the Consumer's behalf about electricity consumption for the Property or the ICP(s); and
- (b) the Retailer to transfer information on the Consumer's behalf about electricity consumption for the Property or ICP(s) to the Agent.

In signing this form as the Authorised representative of the Consumer, I warrant that I am authorised to sign this form and agree to the matters above on behalf of the Consumer.

[Signature/electronic signature of Authorised Representative].

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<sup>9</sup> This is the customer number assigned to the Customer by the Retailer to whom the request is being made.

## Appendix B Revised EIEPs 13A, 13B, and 13C and procedures

# Electricity Information Exchange Protocols (EIEP)

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EIEP 13A: Electricity conveyed information for  
consumers (half hour and non-half hour  
detailed)

Regulated

Effective from 1 March 2020



## Version control

Version	Date amended	Comments
1.2	1 February 2016	
1.3	19 December 2019	Updated to reflect changes as per the ACCES project, including: <ul style="list-style-type: none"><li>- mandatory use of the EIE system</li><li>- a unique request identifier must be provided</li><li>- two new response codes (005 and 006).</li></ul>



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	Glossary of abbreviations and terms	9

# 1 EIEP 13A: Electricity conveyed information for consumers (half hour and non-half hour detailed)

<b>Title:</b>	<b>EIEP 13A: Electricity conveyed information for consumers (half hour and non-half hour detailed)</b>
<b>Version:</b>	1.3 <del>2</del>
<b>Application:</b>	This protocol must be used by retailers to provide electricity consumption information electronically to a consumer or to a consumer's authorised agent if a request is made in accordance with clause 11.32B of the Code.
<b>Participants:</b>	Retailers
<b>Non-participants:</b>	Consumers and authorised consumers' agents
<b>Code reference:</b>	Clauses 11.32A – 11.32F <del>(effective from 1 February 2016)</del>
<b>Dependencies:</b>	The Code and procedures document also contains requirements relevant to the information to be provided in files that are created in accordance with this format specification.

<b>Description of when this protocol applies</b>
<p>This protocol applies when a consumer or a consumer's authorised agent requests detailed consumption information.</p> <p>On request from a consumer or a consumer's authorised agent, a data file formatted in accordance with this EIEP 13A must be forwarded by the retailer to the consumer, or the consumer's authorised agent, to provide consumption information as required by clauses 11.32A – 11.32F of the Code.</p>

<b>Business requirements</b>
<ol style="list-style-type: none"> <li>1 Retailer's must give consumption information to consumers (clause 11.32F(2)(b)) in the format specified in this document.</li> <li>2 If a request for EIEP 13A is received from a consumer's authorised agent via the <a href="#">Authority prescribed EIE system</a><del>EIEP transfer hub</del>, the response <b>will must</b> be sent via the <a href="#">prescribed EIE system</a><del>EIEP transfer hub</del>. <del>However nothing prevents an agent requesting EIEP 13A via a valid email address and receiving a response to that valid email address.</del></li> <li>3 Electricity conveyed is to be expressed as compensation-corrected volumes relevant to a date and time period that is defined by a start date/time value and an end date/time value.</li> <li>4 The time period used in an EIEP 13A must be the most detailed consumption information that the retailer holds in its systems. For example, if a retailer holds half hourly information for publication on the web and non-half hourly information in its billing system, then the retailer should provide an EIEP 13A using half hour time periods. Retailers most frequently hold consumption information in (a) monthly and (b) half hourly time periods.</li> <li>5 Any read period comprising date and time can be accommodated using this format, whether monthly, weekly, daily, hourly, half hourly or sub half hourly:       <ol style="list-style-type: none"> <li>5.1 If the interval of a consumption record is less than one whole day, the Time part of the DateTime formatted value must reflect the appropriate hours, minutes and seconds of the</li> </ol> </li> </ol>

<b>Business requirements</b>	
	record (eg a half hour trading period record could have a start date/time of "01/03/2016 00:30:01" and an end date/time of "01/03/2016 01:00:00"). For clarity, the last period of that day can be shown as a start datetime of 01/03/2016 11:30:01" and an end date/time of either "02/03/2016 00:00:00" or "01/03/2016 24:00:00").
5.2	If the interval of a record is equal to or longer than one whole day, the Time part of the DateTime format is to be coded as 00:00:01 (eg a consumption record for the period 1 May 2016 to 5 June 2016 (inclusive) would have a start date/time of "01/05/2016 00:00:01" and an end date/time of either "06/06/2016 00:00:00" or "05/06/2016 24:00:00").
6	A retailer must only use codes that are: <ul style="list-style-type: none"> <li>(a) stipulated in this document; or</li> <li>(b) approved and published by the Authority; or</li> <li>(c) determined in the registry and reconciliation functional specifications.</li> </ul>
7	Information provided in the file must be consistent with the terminology used in the Glossary of Standard Terms published by the Authority.
8	The file must contain all mandatory information. Failure to provide the required information will result in the file being deemed as incomplete.
9	Information must be provided in accordance with the following status codes unless otherwise specified: <ul style="list-style-type: none"> <li>O Optional</li> <li>M Mandatory where applicable</li> <li>C Conditional - Mandatory if available and required by recipient, otherwise optional.</li> </ul>
10	The consumption information to be provided in an EIEP 13A formatted file is the energy volume imported or exported at a meter register on the requested ICP within a specified time period, after any 'multiplier' or compensation factor has been applied to the meter read, in units of: <ul style="list-style-type: none"> <li>(a) kilowatt hours (kWh) for active energy; and</li> <li>(b) kilovolt ampere reactive hours (kVARh) for reactive energy.</li> </ul>
11	Unmetered load is to be calculated as the volume of unmetered electricity applicable for the period between invoicing dates.
12	The amount of historical consumption information to be provided by the retailer in response to a consumer request is specified in clause 11.32A of the Code.
13	If reactive energy volumes are held by the retailer, they must be provided if the consumer (or their agent) specifically requests this.
14	If the retailer becomes aware of a format error in a transmitted file, or the file is incomplete or otherwise inaccurate, the retailer must advise the consumer as soon as practicable after becoming aware of the issue. This obligation is contained in clause 11.2 of the Code.
15	If previously transmitted information is to be corrected, the retailer must provide a complete replacement file.
16	The file must be named in accordance with the registry functional specification EI-030.
17	All DateTime formatted data must specify NZDT (New Zealand Daylight Savings time) values, adjusted in accordance with clause 15.36 of the Code.

General requirements
<p>1 If there are any conflicts between this document and the Code, the Code will take precedence.</p> <p>2 For clarity, it is the responsibility of retailers to:</p> <p>(a) comply with the Privacy Act</p> <p>(b) maintain business confidentiality when exchanging consumer details</p> <p>(c) ensure that agent arrangements are recorded.</p>

Data inputs
Information from a retailer's back office system.

Event data	Format	Retailer to Consumer: Mandatory/Optional/Conditional	Validation rules
<i>Header record type</i>	Char 3	M	HDR – indicates the row is a header record type
<i>File type</i>	Char 7	M	Must be ICPCONS.
<i>Version of EIEP</i>	Num 3.1	M	Version of EIEP that is being used for this file.
<i>Sender</i>	Char 20	M	Name of sending party. Authority-approved participant and non-participant identifiers must be used where allocated.
<i>Sent on behalf of</i>	Char 4	M	Participant identifier of party on whose behalf consumption information is provided.
<i>Recipient Participant identifier</i>	Char 4	M	Valid recipient participant or non-participant identifier. In the case of a a) consumer this should be CUST b) consumer's agent should be the Authority approved non-participant identifier
<i>Report run date</i>	DD/MM/YYYY	M	Date the report is run
<i>Unique request identifier</i>	Char 15	M	If the unique request identifier is provided in the requesting EIEP 13C it must be provided in EIEP 13A, otherwise BLANK.
<i>Number of detail records</i>	Num 8	M	Total number of DET records in report
<i>Report period start date</i>	DD/MM/YYYY	M	Report run start date (inclusive)
<i>Report period end date</i>	DD/MM/YYYY	M	Report run end date (inclusive)

Event data	Format	Retailer to Consumer: Mandatory/ Optional/ Conditional	Validation rules
<i>Detail record type</i>	Char 3	M	DET – indicates the row is a detail record of consumption information.
<i>Consumer Authorisation code</i>	Char 20	C	A unique number that links the data response to the request. Mandatory if the corresponding request was made with EIEP 13C, otherwise BLANK
<i>ICP identifier</i>	Char 15	M	ICP identifier means a unique identifier for an ICP created by a distributor in accordance with clause 1 of Schedule 11.1
<i>Response code</i>	Char 3	M	<p>Indicates that the request for the specific ICP identifier is either accepted or rejected. The following codes must be used:</p> <p>000 – Request accepted, data follows  001 – Request rejected, no ICP or address or customer match  002 – Request rejected, no ICP record  003 – Request rejected, no customer record  004 – Request rejected, no agent authority  <a href="#">005 – Request rejected, agent authority requested</a>  <a href="#">006 – Request rejected, incorrect format</a></p> <p>If Response code is 000, all of the following fields are required per the field specifications  If Response code is 001, 002, 003 or 004, all of the following values in the DET row are to be set to NULL.</p>
<i>NZDT adjustment</i>	Char 4	C	Refer to clause 15.36 of Part 15 of the Code. If information is NZDT adjusted, the field may be left BLANK, otherwise if it is not adjusted, 'NZST' must be used.
<i>Metering component serial number</i>	Char 30	C	<p>Mandatory for a metering component. Identifies the metering component for installations that have multiple metering components.</p> <p>For unmetered load "UNM" must be used</p>
<i>Energy Flow direction</i>	Char 1	M	An identifier of whether the channel records the import (injection from the ICP into the Network) ("I"), or the export (extraction from the Network to the ICP) ("X").
<i>Register content code</i>	Char 6	M	Identifies the register content code that information is provided for. Refer to SD-020 of the registry functional specification for a list of register content codes

<b>Event data</b>	<b>Format</b>	<b>Retailer to Consumer: Mandatory/ Optional/ Conditional</b>	<b>Validation rules</b>
<i>Period of availability</i>	Char 6	M	Identifies the period of availability that applies to the register content code
<i>Read period start date and time</i>	DD/MM/YYYY HH:MM:SS	M	Date and time of start of read period.
<i>Read period end date and time</i>	DD/MM/YYYY HH:MM:SS	M	Date and time of end of read period
<i>Read status</i>	Char 2	M	RD = actual ES = estimated
<i>Unit quantity active energy volume</i>	Num 12.2	M	Volume information for injection or extraction in kWh
<i>Unit quantity reactive energy volume</i>	Num 12.2	C	Volume information for extraction in kVarh. Mandatory if requested and the information is available to the retailer, otherwise optional. BLANK if information is not provided

<b>Protocol specifications</b>
<ol style="list-style-type: none"> <li>1 The information is to be provided as a comma delimited text file (CSV). Commas are therefore prohibited within fields.</li> <li>2 Each formatted file must consist of one or more records, with each record being a single line of text as defined in this format specification document. Records must be delimited with one of the following: <ol style="list-style-type: none"> <li>(i) a carriage return character and a line feed character combination (ASCII characters 13 and 10) commonly used in the Microsoft Windows operating system</li> <li>(ii) a line feed character (ASCII character 10) commonly used in the Unix operating system, or</li> <li>(iii) a carriage return character (ASCII character 13) commonly used in the Apple OS X operating system.</li> </ol> </li> <li>3 Data fields within files must be defined using the attributes in the table following these specifications.</li> <li>4 Matching of file names, code list values, etc, must be case insensitive.</li> <li>5 Any number of ICPs, register content codes and date range may be included in a single file.</li> <li>6 Each data file must contain only one header line.</li> <li>7 The first record of a file must contain "Header" information followed by zero or more detail lines.</li> <li>8 File naming process shall be in accordance with the registry functional specification EI-030</li> </ol>

Data outputs
1. File delivered electronically to a consumer or to the consumer's agent

## 2 Table of codes used in EIEP 13A

2.1 Table 1 List of attributes to define data fields used in EIEP 13A

Logical format	Data type	Rules	Example
INT (n)	Integer	<p>ASCII representation of an integer number (ie no decimals), no leading zeros, no spaces, a leading "-" if negative (no sign if positive), with 1 to n digits.</p> <p>Numbers only: ASCII characters 48 to 57, and 45 where applicable.</p>	<p>INT (4)</p> <p>12</p> <p>-1234</p>
NUM (n.d)	Decimal	<p>ASCII representation of a decimal number (ie a rational number), no spaces, a leading "-" if negative (no sign if positive), with up n digits including up to (n minus d) digits to the left of the decimal place, and up to d digits to the right of the decimal place.</p> <p>For integers, the decimal point is not required.</p> <p>A decimal point on its own must not be used to represent zero (use "0")</p> <p>Trailing zeros are optional.</p> <p>No leading zeros other than when the number starts with "0."</p> <p>Numbers only: ASCII characters 48 to 57, and 45/46 where applicable.</p>	<p>NUM (6.2)</p> <p>123.45</p> <p>1234.0</p> <p>-12.32</p> <p>NUM (6.3)</p> <p>-0.123</p> <p>23.987</p> <p>987.000</p> <p>8</p>
CHAR (n)	Text	<p>Up to n characters (ASCII characters 32 to 43 and 45 to 126 only).</p> <p>As commas (ASCII character 44) are used as field separators, they must not be used within the field data (it is recommended that any commas found in source data be changed to a semi-colon (ASCII character 59) when files are created.</p> <p>Fields must not contain any leading or trailing spaces.</p>	The quick brown fox

Logical format	Data type	Rules	Example
DATE	Date	ASCII format DD/MM/YYYY with: Year represented as: — YYYY for century and year Month represented as: — MM to display leading zero Day represented as — DD to display leading zero ASCII format for separator {forward slash (47)}	16/02/2005
DATETIME	DateTime	ASCII format DD/MM/YYYY HH:MM:SS Year represented as: — YYYY for century and year Month represented as: — MM to display leading zero Day represented as — DD to display leading zero Hour represented as — HH to display leading zero Minute represented as — MM to display leading zero Second represented as — SS to display leading zero ASCII format for separators {forward slash (47), colon (58), space (32)}	09/03/2015 09:00 (note the ASCII 'space' separator between YYYY and HH)
BLANK		Field contains no data (appears in the file as two sequential commas (,,))	,,



## 2.2 Table 2 ASCII character set for use within fields of EIEP 13A

Character	ASCII
32	Space
33	!
34	"
35	#
36	\$
37	%
38	&
39	'
40	(
41	)
42	*
43	+
44	,
45	-
46	.
47	/
48	0
49	1
50	2
51	3
52	4
53	5
54	6
55	7
56	8
57	9
58	:
59	;
60	<
61	=
62	>
63	?

Character	ASCII
64	@
65	A
66	B
67	C
68	D
69	E
70	F
71	G
72	H
73	I
74	J
75	K
76	L
77	M
78	N
79	O
80	P
81	Q
82	R
83	S
84	T
85	U
86	V
87	W
88	X
89	Y
90	Z
91	[
92	\
93	]
94	^
95	_
96	`

Character	ASCII
97	a
98	b
99	c
100	d
101	e
102	f
103	g
104	h
105	i
106	j
107	k
108	l
109	m
110	n
111	o
112	p
113	q
114	r
115	s
116	t
117	u
118	v
119	w
120	x
121	y
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Note: ASCII control characters 00 – 31 are not to be used within fields.

## Glossary of abbreviations and terms

<b>Act</b>	Electricity Industry Act 2010
<b>AMI</b>	Advanced metering infrastructure
<b>Authority</b>	Electricity Authority
<b>Consumer</b>	means a person who is supplied electricity for consumption, and includes a distributor, a retailer or a generator if the distributor, or the retailer or the generator is supplied with electricity for its own consumption
<b>CSV</b>	Comma separated values
<b>EIEP</b>	Electricity Information Exchange Protocol
<b>FTP</b>	File Transfer Protocol
<b>ICP</b>	Installation Control Point
<b>kWh</b>	Kilowatt hour
<b>Registry</b>	National database that contains information on every point of connection on a network to or from a site for which electricity is supplied or generated.

# Electricity Information Exchange Protocols (EIEP)

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## EIEP13B: Summary consumption information

Regulated

Effective 1 March 2020



## Version control

Version	Date amended	Comments
1.4	1 February 2016	
1.5	19 December 2019	Updated to reflect changes from the ACCES project, including: <ul style="list-style-type: none"><li>• mandating the transfer mechanism</li><li>• requiring the unique request identifier be provided</li><li>• two new response codes (005 and 006)</li><li>•</li></ul>

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# 1 EIEP13B: Summary consumption information

<b>Title:</b>	EIEP 13B: Summary consumption information
<b>Version:</b>	1.54
<b>Application:</b>	This protocol specifies how retailers (or their appointed agents) must provide summary consumption information
<b>Participants:</b>	Retailers
<b>Users:</b>	Consumers and authorised consumers' agents
<b>Code reference:</b>	Clause 11.32A – 11.32F <del>(effective from 1 February 2016)</del>
<b>Dependencies:</b>	The Code and the procedures document also contain requirements relevant to the information to be provided in files that are created in accordance with this format specification.

<b>When this protocol applies</b>
<p>This protocol applies when a consumer or a consumer's authorised agent requests summary consumption information.</p> <p>If a retailer receives a request for consumption data from a consumer or a consumer's authorised agent, the retailer must send the consumption information in a data file formatted in accordance with this EIEP 13B. Refer clauses 11.32A – 11.32F of the Code.</p>

<b>Business requirements</b>
<ol style="list-style-type: none"> <li>1 Retailers must give consumption information to consumers (clause 11.32F(2)(b)) in the format specified in this document.</li> <li>2 Consumers may choose whether to receive an output file as a CSV-formatted electronic file by email, or as printed output in a table format or similar by post.</li> <li>3 If a request for EIEP 13B is received from a consumer's authorised agent via the <a href="#">EIEP Authority's prescribed EIEP system transfer hub</a>, the response will be sent via the <a href="#">prescribed EIE system EIEP transfer hub</a>. <del>However nothing prevents an agent requesting EIEP 13B via a valid email address and receiving a response to that valid email address.</del></li> <li>4 Electricity conveyed must be expressed as compensation-corrected volumes for a date and time period that is defined by a start date/time value and an end date/time value.</li> <li>5 The time period used for EIEP 13B formatted information must match the billed consumption information that the retailer has supplied to the consumer.</li> <li>6 Any read period comprising date and time can be accommodated using this format, whether monthly, weekly, daily, or certain parts of a day: <ol style="list-style-type: none"> <li>(a) If the interval of a consumption record is less than one whole day, the Time part of the DateTime formatted value must reflect the appropriate hours, minutes and seconds of the</li> </ol> </li> </ol>

### Business requirements

- record (eg a half hour trading period record could have a start date/time of "01/03/2016 00:30:01" and an end date/time of "01/03/2016 01:00:00").
- (b) If the interval of a consumption record is equal to or longer than one whole day, the Time part of the DateTime format is to be coded as 00:00:01 (eg a consumption record for the period 1 May 2016 to 5 June 2016 (inclusive) would have a start date/time of "01/05/2016 00:00:01" and an end date/time of "06/06/2016 00:00:00" or "05/06/2016 24:00:00").
- 7 A retailer must only use codes that are:
- (i) stipulated in this document; or
  - (ii) approved and published by the Authority; or
  - (iii) specified in the registry and reconciliation functional specifications.
- 8 Language used in the file must be consistent with the terminology used in the Glossary of Standard Terms published by the Authority.
- 9 The file must contain all mandatory information. Failure to provide the required information will result in the file being deemed as incomplete.
- 10 Information must be provided using with the following status codes:
- O Optional
  - M Mandatory where applicable
  - C Conditional - Mandatory if available and required by recipient, otherwise optional.
- 11 The consumption information to be provided in an EIEP 13B formatted file is the energy volume imported or exported at a meter register on the requested ICP within a specified time period, after any 'multiplier' or compensation factor has been applied., in units of
- (i) kilowatt hours (kWh) for active energy; and
  - (ii) kilovolt ampere reactive hours (kVArh) for reactive energy
- 12 Unmetered load is to be calculated as the volume of unmetered electricity applicable for the period between invoicing dates.
- 13 The amount of historical consumption information to be provided by the retailer in response to a consumer request is specified in clause 11.32A of the Code.
- 14 If the retailer holds reactive energy volumes, the retailer must provide them if the consumer (or their agent) specifically requests this.
- 15 If the retailer becomes aware of a format error in a transmitted file, or the file is incomplete or otherwise inaccurate, the retailer must advise the consumer as soon as practicable after becoming aware of the issue. This obligation is contained in clause 11.2 of the Code.
- 16 Where previously transmitted information is to be corrected, the retailer must provide a complete replacement file.
- 17 The file must be named in accordance with the registry functional specification EI-030.
- 18 All DateTime formatted data must specify NZDT (New Zealand Daylight Savings time) values, adjusted in accordance with clause 15.36 of the Code.

### General requirements

- 1 If there are any conflicts between this document and the Code, the Code will take precedence.
- 2 For clarity, it is the responsibility of retailers to:
- (a) comply with the Privacy Act
  - (b) maintain business confidentiality when exchanging consumer details
  - (c) ensure that agent arrangements are recorded.

Data inputs
Information from a retailer's information system.

Event data	Format	Retailer to Consumer: Mandatory/Optional/Conditional	Validation rules
<i>Header record type</i>	Char 3	M	HDR – indicates the row is a header record type
<i>File type</i>	Char 7	M	Must be ICPSUMM.
<i>Sender</i>	Char 20	M	Name of sending party. Authority-approved participant and non-participant identifiers must be used.
<i>Recipient Participant identifier</i>	Char 4	M	Valid recipient non-participant identifier. In the case of a a) consumer this should be CUST b) consumers agent should be the Authority-approved non-participant identifier
<i>Report run date</i>	DD/MM/YYYY	M	Date the report is run
<i>Unique request identifier</i>	Char 15	M	<del>If</del> The unique request identifier is provided in the requesting EIEP 13C <del>it must be provided in EIEP 13B, otherwise BLANK</del>
<i>Response code</i>	Char 3	M	Indicates that the request for the specific ICP identifier is either accepted or rejected. The following codes must be used: 000 – Request accepted, data follows 001 – Request rejected, no ICP or address or customer match 002 – Request rejected, no ICP record 003 – Request rejected, no customer record 004 – Request rejected, no agent authority <a href="#">005 – Request rejected, agent authority requested</a> <a href="#">006 – Request rejected, incorrect format</a> If Response code is 000, all of the following fields are required per the field specifications If Response code is 001, 002, 003 or 004, the following DET records only require the ICP to be populated.
<i>Number of detail records</i>	Num 8	M	Total number of DET records in report
<i>Report period start date</i>	DD/MM/YYYY	M	Report run start date (inclusive)



<b>Event data</b>	<b>Format</b>	<b>Retailer to Consumer: Mandatory/ Optional/Condi tional</b>	<b>Validation rules</b>
<i>Report period end date</i>	DD/MM/YYYY	M	Report run end date (inclusive)
<i>NZDT adjustment</i>	Char 4	C	Refer to clause 15.36 of Part 15 of the Code. If information is NZDT adjusted, the field may be left BLANK, otherwise if it is not adjusted, NZST must be used

<b>Event data</b>	<b>Format</b>	<b>Retailer to Consumer: Mandatory/ Optional/Condi tional</b>	<b>Validation rules</b>
<i>Title column 1</i>	Char 3	M	DES – indicates the row is field descriptions, to align with columns in detail records
<i>Title column 2</i>	Char 30	M	Must be “ICP identifier”
<i>Title column 3</i>	Char 30	M	Must be “Metering component serial number”
<i>Title column 4</i>	Char 30	M	Must be “Energy flow direction”
<i>Title column 5</i>	Char 30	M	Must be “Register content code”
<i>Title column 6</i>	Char 30	M	Must be “Period of availability”
<i>Title column 7</i>	Char 30	M	Must be “Read period start date and time”
<i>Title column 8</i>	Char 30	M	Must be “Read period end date and time”
<i>Title column 9</i>	Char 30	M	Must be “Read status”
<i>Title column 10</i>	Char 30	M	Must be “Tariff name”
<i>Title column 11</i>	Char 30	M	Must be “Active energy kWh”
<i>Title column 12</i>	Char 30	M	Must be “Reactive energy kVArh”

<b>Event data</b>	<b>Format</b>	<b>Retailer to Consumer: Mandatory/ Optional/ Conditional</b>	<b>Validation rules</b>
<i>Detail record type</i>	Char 3	M	DET – indicates the row is a detail record of consumption information.

<b>Event data</b>	<b>Format</b>	<b>Retailer to Consumer: Mandatory/ Optional/ Conditional</b>	<b>Validation rules</b>
<i>ICP identifier</i>	Char 15	M	ICP identifier means a unique identifier for an ICP created by a distributor in accordance with clause 1 of Schedule 11.1
<i>Metering component serial number</i>	Char 30	C	Mandatory for a metering component. Identifies the metering component for installations that have multiple metering components. Includes unmetered load where there is a metering component and unmetered load on the same register content code. For unmetered load "UNM" must be used
<i>Energy flow direction</i>	Char 15	C	An identifier of whether the channel records the import (injection from the ICP into the Network) ("I"), or the export (extraction from the Network to the ICP) ("X"). If "X" format must show words = "Consumption" If "I" format must show words = "Generation" Mandatory unless response code is 001, 002, 003 or 004
<i>Register content code</i>	Char 6	C	Identifies the register content code that information is provided for. Refer to SD-020 of the registry functional specification for a list of register content codes Mandatory unless response code is 001, 002, 003 or 004
<i>Period of availability</i>	Char 6	C	Identifies the period of availability that applies to the register content code Mandatory unless response code is 001, 002, 003 or 004
<i>Read period start date and time</i>	DD/MM/YYYY HH:MM:SS	C	Date and time of start of read period. Mandatory unless response code is 001, 002, 003 or 004
<i>Read period end date and time</i>	DD/MM/YYYY HH:MM:SS	C	Date and time of end of read period Mandatory unless response code is 001, 002, 003 or 004
<i>Read status</i>	Char 2	C	RD = actual ES = estimated Mandatory unless response code is 001, 002, 003 or 004

<b>Event data</b>	<b>Format</b>	<b>Retailer to Consumer: Mandatory/ Optional/ Conditional</b>	<b>Validation rules</b>
<i>Tariff name</i>	Char 50	C	Name of tariff rate, e.g. "Anytime" or "Controlled" etc. To be assigned by the retailer to align with terminology it has used in its price schedule. Mandatory unless response code is 001, 002, 003 or 004
<i>Unit quantity active energy volume</i>	Num 12.2	C	Volume information for injection or extraction in kWh Mandatory unless response code is 001, 002, 003 or 004
<i>Unit quantity reactive energy volume</i>	Num 12.2	C	Volume information for extraction in kVarh. Mandatory if requested and the information is available to the retailer, otherwise optional. BLANK if information is not provided

### Protocol specifications

- 1 The information is to be a comma delimited text file (CSV). Commas are therefore prohibited within fields.
- 2 Each formatted file must consist of one or more records, with each record being a single line of text as defined in this format specification document. Records must be delimited with one of the following:
  - (i) a carriage return character and a line feed character combination (ASCII characters 13 and 10) commonly used in the Microsoft Windows operating system
  - (ii) a line feed character (ASCII character 10) commonly used in the Unix operating system, or
  - (iii) a carriage return character (ASCII character 13) commonly used in the Apple OS X operating system.
- 3 Data fields within files must be defined using the attributes in the table following these specifications.
- 4 Matching of file names, code list values, etc., must be case insensitive.
- 5 Any number of ICPs, register content codes and date ranges may be included in a single file.
- 6 Each data file must contain only one header line.
- 7 The first record of a file must contain "Header" information (HDR) followed by one heading description row (DES) followed by zero or more detail rows (DET).
- 8 File naming process must be in accordance with the registry functional specification EI-030

### Data outputs

1. File delivered electronically to a consumer or to the consumer's agent

## 2 Table of codes used in EIEP 13B

2.1 Table 1 List of attributes to define data fields used in EIEP 13B

Logical format	Data type	Rules	Example
INT (n)	Integer	<p>ASCII representation of an integer number (i.e. no decimals), no leading zeros, no spaces, a leading "-" if negative (no sign if positive), with 1 to n digits.</p> <p>Numbers only: ASCII characters 48 to 57, and 45 where applicable.</p>	<p>INT (4)</p> <p>12</p> <p>-1234</p>
NUM (n.d)	Decimal	<p>ASCII representation of a decimal number (ie a rational number), no spaces, a leading "-" if negative (no sign if positive), with up n digits including up to (n minus d) digits to the left of the decimal place, and up to d digits to the right of the decimal place.</p> <p>For integers, the decimal point is not required.</p> <p>A decimal point on its own must not be used to represent zero (use "0")</p> <p>Trailing zeros are optional.</p> <p>No leading zeros other than when the number starts with "0."</p> <p>Numbers only: ASCII characters 48 to 57, and 45/46 where applicable.</p>	<p>NUM (6.2)</p> <p>123.45</p> <p>1234.0</p> <p>-12.32</p> <p>NUM (6.3)</p> <p>-0.123</p> <p>23.987</p> <p>987.000</p> <p>8</p>
CHAR (n)	Text	<p>Up to n characters (ASCII characters 32 to 43 and 45 to 126 only).</p> <p>As commas (ASCII character 44) are used as field separators, they must not be used within the field data (it is recommended that any commas found in source data be changed to a semi-colon (ASCII character 59) when files are created.</p> <p>Fields must not contain any leading or trailing spaces.</p>	The quick brown fox
DATE	Date	<p>ASCII format DD/MM/YYYY</p> <p>Year represented as:</p> <p>— YYYY for century and year</p> <p>Month represented as:</p> <p>— MM to display leading zero</p> <p>Day represented as</p> <p>— DD to display leading zero</p> <p>ASCII format for separator {forward slash (47)}</p>	16/02/2005

Logical format	Data type	Rules	Example
DATETIME	DateTime	ASCII format DD/MM/YYYY HH:MM:SS Year represented as: — YYYY for century and year Month represented as: — MM to display leading zero Day represented as — DD to display leading zero Hour represented as — HH to display leading zero Minute represented as — MM to display leading zero Second represented as — SS to display leading zero ASCII format for separators {forward slash (47), colon (58), space (32)}	16/03/2015 09:30 (note the ASCII 'space' separator between YYYY and HH)
BLANK		Field contains no data (appears as two sequential commas (,) in the file)	,,

## 2.2 Table 2 ASCII character set for use within fields of EIEP 13B

Character	ASCII
32	Space
33	!
34	"
35	#
36	\$
37	%
38	&
39	'
40	(
41	)
42	*
43	+
45	-
46	.
47	/
48	0
49	1
50	2
51	3
52	4
53	5
54	6
55	7
56	8
57	9
58	:
59	;
60	<
61	=
62	>
63	?

Character	ASCII
64	@
65	A
66	B
67	C
68	D
69	E
70	F
71	G
72	H
73	I
74	J
75	K
76	L
77	M
78	N
79	O
80	P
81	Q
82	R
83	S
84	T
85	U
86	V
87	W
88	X
89	Y
90	Z
91	[
92	\
93	]
94	^
95	_
96	`

Character	ASCII
97	a
98	b
99	c
100	d
101	e
102	f
103	g
104	h
105	i
106	j
107	k
108	l
109	m
110	n
111	o
112	p
113	q
114	r
115	s
116	t
117	u
118	v
119	w
120	x
121	y
122	z
123	{
124	
125	}
126	~

## Glossary of abbreviations and terms

<b>Act</b>	Electricity Industry Act 2010
<b>Authority</b>	Electricity Authority
<b>Code</b>	Electricity Industry Participation Code 2010
<b>Consumer</b>	means a person who is supplied electricity for consumption, and includes a distributor, a retailer or a generator if the distributor, or the retailer or the generator is supplied with electricity for its own consumption
<b>CSV</b>	Comma separated values
<b>EIEP</b>	Electricity Information Exchange Protocol
<b>ICP</b>	Installation Control Point
<b>kVA<sub>r</sub>h</b>	Kilovolt-ampere reactive hour
<b>kWh</b>	Kilowatt hour

<b>Sample of electronic output file viewed as a CSV text file</b>
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HDR,ICPSUMM,EANZ,CUST,20/03/2014,Ron001,000,18,20/03/2014,20/03/2015,NZDT

DES,ICP identifier,Metering component serial number,Energy flow direction,Register content code,Period of availability,Read period start date and time,Read period end date and time,Read status,Tariff name,Active energy kWh,Reactive energy kVArh

DET,0000021314CPABC,213515698,Consumption,UN,24,25/03/2014 00:00,20/05/2014 00:00,RD,Anytime,350,35

DET,0000021314CPABC,213515698,Consumption,CN,17,25/03/2014 00:00,20/05/2014 00:00,RD,Controlled,450,45

DET,0000021314CPABC,213515698,Generation,EG,24,25/03/2014 00:00,20/05/2014 00:00,RD,Embedded generation,75,0

DET,0000021314CPABC,213515698,Consumption,UN,24,20/05/2014 00:00,18/07/2014 00:00,RD,Anytime,350,35

DET,0000021314CPABC,213515698,Consumption,CN,17,20/05/2014 00:00,18/07/2014 00:00,RD,Controlled,450,45

DET,0000021314CPABC,213515698,Generation,EG,24,20/05/2014 00:00,18/07/2014 00:00,RD,Embedded generation,75,0

DET,0000021314CPABC,213515698,Consumption,UN,24,18/07/2014 00:00,22/09/2014 00:00,RD,Anytime,350,35

DET,0000021314CPABC,213515698,Consumption,CN,17,18/07/2014 00:00,22/09/2014 00:00,RD,Controlled,450,45

DET,0000021314CPABC,213515698,Generation,EG,24,18/07/2014 00:00,22/09/2014 00:00,RD,Embedded generation,75,0

DET,0000021314CPABC,213515698,Consumption,UN,24,22/09/2014 00:00,25/11/2014 00:00,RD,Anytime,350,35

DET,0000021314CPABC,213515698,Consumption,CN,17,22/09/2014 00:00,25/11/2014 00:00,RD,Controlled,450,45

DET,0000021314CPABC,213515698,Generation,EG,24,22/09/2014 00:00,25/11/2014 00:00,RD,Embedded generation,75,0

DET,0000021314CPABC,213515698,Consumption,UN,24,25/11/2014 00:00,20/01/2015 00:00,RD,Anytime,350,35

DET,0000021314CPABC,213515698,Consumption,CN,17,25/11/2014 00:00,20/01/2015 00:00,RD,Controlled,450,45

DET,0000021314CPABC,213515698,Generation,EG,24,25/11/2014 00:00,20/01/2015 00:00,RD,Embedded generation,75,0

DET,0000021314CPABC,213515698,Consumption,UN,24,20/01/2015 00:00,17/03/2015 00:00,ES,Anytime,350,35

DET,0000021314CPABC,213515698,Consumption,CN,17,20/01/2015 00:00,17/03/2015 00:00,ES,Controlled,450,45

DET,0000021314CPABC,213515698,Generation,EG,24,20/01/2015 00:00,17/03/2015 00:00,ES,Embedded generation,75,0



**Sample of electronic output file viewed as an Excel file (with a little formatting), or a PDF printed page**

HDR	ICPSUMM	EANZ	Cust	20/03/20 14	Ron001	000	18	20/03/2014	20/03/2015	NZDT				
DES	ICP Identifier	Metering component serial number	Energy flow direction	Register content code	Period of availability	Read period start date and time	Read period end date and time	Read status	Tariff name	Active energy kWh	Reactive energy kVArh			
DET	0000021314CPABC	213515698	Consumption	UN	24	25/03/2014 00:00	20/05/2014 00:00	RD	Anytime	350	35			
DET	0000021314CPABC	213515698	Consumption	CN	17	25/03/2014 00:00	20/05/2014 00:00	RD	Controlled	450	45			
DET	0000021314CPABC	213515698	Generation	EG	24	25/03/2014 00:00	20/05/2014 00:00	RD	Embedded generation	75	0			
DET	0000021314CPABC	213515698	Consumption	UN	24	20/05/2014 00:00	18/07/2014 00:00	RD	Anytime	350	35			
DET	0000021314CPABC	213515698	Consumption	CN	17	20/05/2014 00:00	18/07/2014 00:00	RD	Controlled	450	45			
DET	0000021314CPABC	213515698	Generation	EG	24	20/05/2014 00:00	18/07/2014 00:00	RD	Embedded generation	75	0			
DET	0000021314CPABC	213515698	Consumption	UN	24	18/07/2014 00:00	22/09/2014 00:00	RD	Anytime	350	35			
DET	0000021314CPABC	213515698	Consumption	CN	17	18/07/2014 00:00	22/09/2014 00:00	RD	Controlled	450	45			
DET	0000021314CPABC	213515698	Generation	EG	24	18/07/2014 00:00	22/09/2014 00:00	RD	Embedded generation	75	0			
DET	0000021314CPABC	213515698	Consumption	UN	24	22/09/2014 00:00	25/11/2014 00:00	RD	Anytime	350	35			
DET	0000021314CPABC	213515698	Consumption	CN	17	22/09/2014 00:00	25/11/2014 00:00	RD	Controlled	450	45			
DET	0000021314CPABC	213515698	Generation	EG	24	22/09/2014 00:00	25/11/2014 00:00	RD	Embedded generation	75	0			
DET	0000021314CPABC	213515698	Consumption	UN	24	25/11/2014 00:00	20/01/2015 00:00	RD	Anytime	350	35			
DET	0000021314CPABC	213515698	Consumption	CN	17	25/11/2014 00:00	20/01/2015 00:00	RD	Controlled	450	45			
DET	0000021314CPABC	213515698	Generation	EG	24	25/11/2014 00:00	20/01/2015 00:00	RD	Embedded generation	75	0			
DET	0000021314CPABC	213515698	Consumption	UN	24	20/01/2015 00:00	17/03/2015 00:00	ES	Anytime	350	35			
DET	0000021314CPABC	213515698	Consumption	CN	17	20/01/2015 00:00	17/03/2015 00:00	ES	Controlled	450	45			
DET	0000021314CPABC	213515698	Generation	EG	24	20/01/2015 00:00	17/03/2015 00:00	ES	Embedded generation	75	0			

# Electricity Information Exchange Protocols (EIEP)

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## EIEP13C: Request file for EIEP13 and EIEP13B

Regulated

Effective from 1 March 2020



## Version control

Version	Date amended	Comments
1.0	1 February 2016	
1.1	19 December 2019	Updated to reflect changes from the ACCES project, including: <ul style="list-style-type: none"><li>• mandating the method of transfer</li><li>• two fields removed: EIEP delivery method field, and email address field</li><li>• two new fields: Authority expiry date field, and Statement of written authority field</li></ul>

## Contents

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# 1 EIEP 13C: Request file for EIEP 13A and EIEP 13B

<b>Title:</b>	<b>EIEP 13C: Request file for EIEP 13A and EIEP 13B</b>
<b>Version:</b>	1.1 <del>0</del>
<b>Application:</b>	This protocol allows a <a href="#">consumer to request consumption information or a consumer's authorised agent</a> to request consumption information on behalf of the consumer ( <a href="#">a Requester</a> ). The response sent by the retailer will be formatted in accordance with EIEP 13A or EIEP 13B and transmitted electronically.
<b>Participants:</b>	Retailers, <a href="#">Distributors</a> . <a href="#">Could be an agent on behalf of a consumer or the recipient of a request.</a>
<b>Non-participants:</b>	Authorised consumer agents <a href="#">who are not participants</a>
<b>Code reference:</b>	Clause 11.32A – 11.32F ( <del>effective from 1 February 2016</del> )
<b>Dependencies:</b>	The Code and procedures document also contains requirements relevant to the information to be provided in files that are created in accordance with this format specification.

<b>Description of when this protocol applies</b>
This protocol allows a <del>consumer's authorised agent to request</del> <a href="#">for</a> consumption information <del>on behalf of the consumer</del> . The response sent by the retailer will be formatted in accordance with EIEP 13A or EIEP 13B and transmitted electronically <a href="#">via the Authority's prescribed EIE system</a> .

<b>Business requirements</b>
<ol style="list-style-type: none"> <li>1 The relevant Code provisions are set out in clauses 11.32A – 11.32F. The format in which information must be given to consumers (clause 11.32F(2)(b)) is the format specified in this document.</li> <li><del>2</del> <a href="#">Information provided in the file must be consistent with the terminology used in the Glossary of Standard Terms published by the Authority.</a></li> <li><a href="#">3 A request for consumption information in this format must be submitted via the EIEP transfer hub. Requests in other formats may be submitted directly to retailers.</a></li> <li><del>2</del></li> <li><del>3</del> <a href="#">4</a> The file must be named in accordance with the registry functional specification EI-030.</li> </ol>

<b>General requirements</b>
<ol style="list-style-type: none"> <li>1 If there are any conflicts between this document and the Code, the Code will take precedence.</li> <li>2 For clarity, it is the responsibility of retailers and the <del>consumer's authorised agents</del> <a href="#">Requesters</a> to: <ol style="list-style-type: none"> <li>(a) comply with the Privacy Act</li> </ol> </li> </ol>

General requirements
<p>(b) maintain business confidentiality when exchanging consumer details</p> <p>(c) ensure that agent arrangements are recorded.</p> <p>3 The receipt of a valid EIEP 13C request <del>from an authorised agent</del> should trigger the release of an EIEP 13A or EIEP 13B formatted file in response.</p>

Data inputs
Electronic request form

Event data	Format	Retailer to Consumer: Mandatory/ Optional/Conditional	Validation rules
<i>Header record type</i>	Char 3	M	HDR – indicates the row is a header record type
<i>File type</i>	Char 7	M	Must be REQCONS.
<i>Sender</i>	Char 20	M	Name of sending party. Authority-approved participant and non-participant identifiers must be used.
<i>Recipient Participant identifier</i>	Char 4	M	Valid recipient participant identifier of the retailer the request is made to.
<i>Report run date</i>	DD/MM/YYYY	M	Date the report is run
<i>Unique request identifier</i>	Char 15	M	Number that uniquely identifies the file
<i>Number of detail records</i>	Num 8	M	Total number of DET records in report

Event data	Format	Consumer or consumers agent to retailer: Mandatory/ Optional/ Conditional	Validation rules
<i>Detail record type</i>	Char 3	M	DET – indicates the row is a detail record of consumption information.
<i>EIEP format requested</i>	Char 7	M	Must be either “EIEP13A” or “EIEP13B” depending on <del>agent's</del> <u>Requester's</u> requirements. If both are required for a single <del>customer</del> <u>consumer</u> , two DET rows must be included.

Event data	Format	Consumer or consumers agent to retailer: Mandatory/ Optional/ Conditional	Validation rules
<i>EIEP delivery method</i>	Char 7	M	EIEP13A and/or EIEP 13B can be delivered via either email or the registry data hub <ul style="list-style-type: none"> <li>“EMAIL” indicates a valid email address must be provided</li> <li>“DATAH” indicates that a valid participant or non-participant identifier must be provided that has access to the registry data hub</li> </ul>
Consumer Authorisation code	Char 20	<u>OG</u>	A unique character code that links the consumer's authorisation of the data to the data file if an authorisation code has been previously agreed with the retailer Mandatory <u>To be provided</u> where a code has been agreed <u>by both parties</u> otherwise BLANK
<u>Authority expiry date</u>	<u>DD/MM/YYYY</u>	<u>M</u>	<u>The end date of the authority of the Requester (if an agent). Can be no more than 24 months from the request date.</u>
<u>Statement of written authority</u>	<u>Char 3</u>	<u>M</u>	<u>The Requester has obtained a written authority from the consumer in the form and containing the information required by Schedule 11.6 of the Code, being an authority that remains in force at the date the request is made.</u> <u>Must be either “Yes” or “No”</u>
Consumer no	Char 15	M	Trader's consumer number. Defined as the retailer's unique ID that links the premises and the <del>customer</del> consumer. If not available then use null.
Customer name	Char 100	M	Legal name or the name of the <del>customer</del> consumer that is shown on the <del>consumers</del> customers invoice. Must be the responsible person recorded by the retailer against the ICP for a period within the last 2 years Multiple names to be concatenated into one field
ICP identifier	Char 15	M	ICP identifier means a unique identifier for an ICP created by a distributor in accordance with clause 1 of Schedule 11.1
<del>Email address</del>	<del>Char 50</del>	<del>M</del>	<del>Mandatory if “EMAIL” entered in EIEP delivery method otherwise BLANK.</del>
Install address unit	Char 25	M	Sub dwelling number; Level of sub dwelling that is shown on the <del>consumers</del> customers invoice. Can be BLANK.

Event data	Format	Consumer or consumers agent to retailer: Mandatory/ Optional/ Conditional	Validation rules
<i>Install address number</i>	Char 6	M	Number issued by government agency or local government authority that identifies a point or location on a street for postal purposes that is shown on the <a href="#">consumers</a> <del>customers</del> invoice. Can be BLANK.
<i>Install address street</i>	Char 30	M	Official road name issued by government agency or local government authority that is shown on the <a href="#">consumers</a> <del>customers</del> invoice. Can be BLANK.
<i>Install address suburb</i>	Char 30	M	A bounded locality within a city, town or shire principally of urban character that is shown on the <a href="#">consumers</a> <del>customers</del> invoice. Can be BLANK.
<i>Install address PO Box/RD</i>	Char 30	M	Number assigned a postal delivery box or rural delivery number that is shown on the <a href="#">consumers</a> <del>customers</del> invoice. Can be BLANK.
<i>Install address town</i>	Char 30	M	An officially recognised and named population centre, defined within a geographic boundary that is shown on the <a href="#">consumers</a> <del>customers</del> invoice. Can be BLANK.
<i>Install address postcode</i>	Char 30	M	The post code assigned by NZ post (zip code if outside NZ) that is shown on the <a href="#">consumers</a> <del>customers</del> invoice. Can be BLANK.
<i>Install address country</i>	Char 30	M	The country for postal information that is shown on the <a href="#">consumers</a> <del>customers</del> invoice. Can be BLANK.

Protocol specifications
<ol style="list-style-type: none"> <li>1 The information must be provided as a comma-delimited text file (CSV). Commas are therefore prohibited within fields.</li> <li>2 Each formatted file must consist of one or more records, with each record being a single line of text as defined in this format specification document. Records must be delimited with one of the following: <ol style="list-style-type: none"> <li>(a) a carriage return character and a line feed character combination (ASCII characters 13 and 10) commonly used in the Microsoft Windows operating system</li> <li>(b) a line feed character (ASCII character 10) commonly used in the Unix operating system, or</li> <li>(c) a carriage return character (ASCII character 13) commonly used in the Apple OS X operating system.</li> </ol> </li> <li>3 Data fields within files must be defined using the attributes in the table following these specifications.</li> <li>4 Matching of file names, code list values, etc, must be case insensitive.</li> </ol>



<b>Protocol specifications</b>
--------------------------------

- |  |
|--|
| <ol style="list-style-type: none"><li>5 Any number of ICPs, register content codes and date range may be included in a single file.</li><li>6 Each data file must contain only one header line.</li><li>7 The first record of a file must contain "Header" information followed by zero or more detail lines.</li><li>8 File naming process shall be in accordance with the registry functional specification EI-030</li></ol> |
|--|

<b>Data outputs</b>
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- |  |
|--|
| <ol style="list-style-type: none"><li>1. File delivered electronically to a retailer from a consumer or the consumer's agent</li></ol> |
|--|

## 2 Table of codes used in EIEP 13C

### 1.1 Table 1 List of attributes to define data fields used in EIEP 13C

Logical format	Data type	Rules	Example
INT (n)	Integer	<p>ASCII representation of an integer number (ie no decimals), no leading zeros, no spaces, a leading "-" if negative (no sign if positive), with 1 to n digits.</p> <p>Numbers only: ASCII characters 48 to 57, and 45 where applicable.</p>	<p>INT (4)</p> <p>12</p> <p>-1234</p>
NUM (n.d)	Decimal	<p>ASCII representation of a decimal number (ie a rational number), no spaces, a leading "-" if negative (no sign if positive), with up n digits including up to (n minus d) digits to the left of the decimal place, and up to d digits to the right of the decimal place.</p> <p>For integers, the decimal point is not required.</p> <p>A decimal point on its own must not be used to represent zero (use "0")</p> <p>Trailing zeros are optional.</p> <p>No leading zeros other than when the number starts with "0."</p> <p>Numbers only: ASCII characters 48 to 57, and 45/46 where applicable.</p>	<p>NUM (6.2)</p> <p>123.45</p> <p>1234.0</p> <p>-12.32</p> <p>NUM (6.3)</p> <p>-0.123</p> <p>23.987</p> <p>987.000</p> <p>8</p>
CHAR (n)	Text	<p>Up to n characters (ASCII characters 32 to 43 and 45 to 126 only).</p> <p>As commas (ASCII character 44) are used as field separators, they must not be used within the field data (it is recommended that any commas found in source data be changed to a semi-colon (ASCII character 59) when files are created.</p> <p>Fields must not contain any leading or trailing spaces.</p>	The quick brown fox
DATE	Date	<p>ASCII format DD/MM/YYYY</p> <p>Year represented as:</p> <p>— YYYY for century and year</p> <p>Month represented as:</p> <p>— MM to display leading zero</p> <p>Day represented as</p> <p>— DD to display leading zero</p> <p>ASCII format for separator {forward slash (47)}</p>	16/02/2005
BLANK		Field contains no data (appears as two sequential commas (,) in the file)	,"

## 1.2 Table 2 ASCII character set for use within fields of EIEP 13C

Character	ASCII
32	Space
33	!
34	"
35	#
36	\$
37	%
38	&
39	'
40	(
41	)
42	*
43	+
45	-
46	.
47	/
48	0
49	1
50	2
51	3
52	4
53	5
54	6
55	7
56	8
57	9
58	:
59	;
60	<
61	=
62	>
63	?

Character	ASCII
64	@
65	A
66	B
67	C
68	D
69	E
70	F
71	G
72	H
73	I
74	J
75	K
76	L
77	M
78	N
79	O
80	P
81	Q
82	R
83	S
84	T
85	U
86	V
87	W
88	X
89	Y
90	Z
91	[
92	\
93	]
94	^
95	_
96	`

Character	ASCII
97	a
98	b
99	c
100	d
101	e
102	f
103	g
104	h
105	i
106	j
107	k
108	l
109	m
110	n
111	o
112	p
113	q
114	r
115	s
116	t
117	u
118	v
119	w
120	x
121	y
122	z
123	{
124	
125	}
126	~

## Glossary of abbreviations and terms

<b>Act</b>	Electricity Industry Act 2010
<b>Authority</b>	Electricity Authority
<b>Consumer</b>	means a person who is supplied electricity for consumption, and includes a distributor, a retailer or a generator if the distributor, or the retailer or the generator is supplied with electricity for its own consumption
<b>CSV</b>	Comma separated values
<b>EIEP</b>	Electricity Information Exchange Protocol
<b>ICP</b>	Installation Control Point
<b>kWh</b>	Kilowatt hour
<b><u>Requester</u></b>	<u><a href="#">The consumer or authorised agent of a consumer making a request for consumption information of the consumer</a></u>

# Requests for consumer consumption information

## Procedures

[Effective from 1 March 2020](#)



## Version control

Version	Date amended	Comments
1.0	9 June 2015	Final for publication
1.1	15 September 2015	Clarification to paragraphs 8 and 10 to clarify 'available' information
1.3	27 October 2015	Clarification to paragraphs 4 and 5 to clarify the information required under Code reference clause 11.32A. A few other related changes also made in document for consistency
1.4	18 November 2015	Minor change to correct incorrect Code clause reference in paragraphs 17 and 23. These paragraphs incorrectly referred to Code reference 11.32B(4), when the correct Code reference is 11.32B(3).
<a href="#">1.5</a>	<a href="#">20 December 2019</a>	<a href="#">Changes to reflect amendments to Code Clause 11.32E</a>





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## Introduction

1. Clauses 11.32A to 11.32F of the Electricity Industry Participation Code (Code), which are effective from 1 February 2016, require retailers to give consumers information about their own consumption of electricity upon that consumer's request. This document sets out procedures that apply to retailers when they respond to such requests. The document also contains information that will assist consumers and their agents to make requests for consumption information.
2. A "retailer" includes any participant that supplies electricity to any other person for any purpose other than for resupply by the other person. This definition includes retailers that purchase electricity from any other person to on sell to a consumer.
3. Any questions about this procedures document should be directed to the Market Operations Team by email to [marketoperations@ea.govt.nz](mailto:marketoperations@ea.govt.nz).

## What information must retailers provide?

Code reference: clause 11.32A

4. If a retailer has supplied a consumer in the past 24 months, the retailer must give the consumer (or their agent) the following information on request:
  - (a) information used by the retailer to calculate the amount of electricity conveyed to or from the consumer at each installation control point (ICP) where the retailer supplied electricity to the consumer
  - (b) information used by the retailer to provide a service to the consumer about the amount of electricity conveyed to or from the consumer at each of the ICPs where the retailer supplied electricity to the consumer.
5. An example of a service to a consumer is a secure website that provides consumption information. This consumption information could be non-half hour (NHH), half hour (HHR), or more granular information (eg, 15 minute interval consumption data).
6. A retailer must provide consumption information regardless if this information is validated or not.
7. Monthly aggregated consumption information will usually be 12 records a year. HHR consumption information will usually be 17520 records per year. More granular consumption information will be greater again (eg, 35,040 records per year for 15 minute interval metering information).
8. If used by the retailer, as described in paragraph 4, the retailer must provide both:
  - (a) import (consumption) and export (generation) information
  - (b) real and reactive energy information.

## What if a consumer switches retailers?

9. The example included in Figure 1 shows a timeline that includes a retailer switch situation, where a consumer is initially supplied by Retailer A but later switches to Retailer B. After the switch, Retailer A (the losing retailer in the example) is still required to hold consumption information for its former consumer, but for a diminishing period of time. Once 24 months has elapsed from the date of the switch, Retailer A has no further obligation to hold information for the consumer.<sup>1</sup>
10. Retailer B picks up the obligation to hold new information for the consumer it has won from Retailer A, starting from the switch date. The amount of information Retailer B is required to hold builds up until 24 months has elapsed from the switch date, at which point it must always retain at least the last 24 months of information.
11. Within 24 months following a retailer switch, a consumer that seeks all of its consumption information will need to make at least two requests; one request each to Retailer A and Retailer B and possibly additional requests to subsequent retailers if the consumer has switched more than once in the 24 month period. When aggregated, the information received by the consumer or agent should be contiguous across the switch date(s).

## When must a retailer provide consumption information to a consumer?

Code reference: clause 11.32B

12. A request from a consumer or its authorised agent (collectively referred to in this document as the 'requester') will trigger provision of the consumer's consumption information by a retailer. Each retailer will need to design a business process to manage consumer requests for consumption information.
13. Retailers must provide the requested consumption information to the requester no later than five business days after receipt by the retailer of a complete application. A complete application must contain all information reasonably required by the retailer to verify the proper identity of the consumer to which the request applies.

## How can a consumer request its consumption information?

Code reference: clause 11.32B

14. A consumer must be able to request its consumption information by:
  - (a) phone call to the retailer
  - (b) written request to the retailer, transmitted by email or post.
15. In addition to the methods identified in paragraph 14, if the retailer has provided a suitable facility, a consumer may request its consumption information by electronic request, eg via a website or a smartphone application.

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<sup>1</sup> At least, the retailer has no further obligation *under this section of the Code*. See Clause 18 of Schedule 15.2 for archiving and storage of raw meter data.

16. If a consumer authorises an agent to act on its behalf to request the consumer's consumption information from a retailer, the agent is encouraged to make the request by transmitting an electronic request formatted in accordance with Electricity Information Exchange Protocol (EIEP) 13C. If an agent chooses to submit an EIEP 13C ~~and transmit this~~ to the retailer it must do so via the Authority's prescribed EIE system ~~EIEP transfer hub (EIEP hub) (EIE system)~~.

### **Can a retailer charge a fee for providing consumption information?**

Code reference: clause 11.32B(3)

17. A retailer may impose a reasonable charge only if the consumer (including any agent acting on behalf of the consumer) has made more than four requests in the preceding 12 months. If both an EIEP13A and an EIEP13B are requested via an EIEP13C these requests must be counted as a single request for the purposes of subclause 11.32(B)(3) if the requests are submitted on the same day.

### **When must a retailer advise its consumers of the availability of consumption information?**

Code reference: clause 11.32C

18. At least once in each calendar year, each retailer must notify each of its consumers of the consumer's right to access its consumption information. Retailers should notify their consumers using the method they normally use to communicate important information to individual consumers.

### **What must retailers do to keep information secure?**

Code reference: clause 11.32D

19. Clause 11.32D requires the retailer to:
- (a) be satisfied as to the identity of the consumer making the request for consumption information
  - (b) ensure that only the requestor receives the information.
20. Each retailer must develop and implement processes that ensure that only the appropriate consumer or its agent receives consumption information provided in accordance with clause 11.32B. This process must comply with the Privacy Act 1993 and should implement good business practice.
21. For clarity, if the requester subsequently provides the consumer's information to any other party, these information security obligations become the responsibility of the requester.

### **What if the request comes from a consumer's agent?**

Code reference: clause 11.32E

22. A consumer may authorise an agent to request the consumer's consumption information.

23. A consumer's authorised agent is encouraged to use EIEP 13C to request consumption information on behalf of the consumer. The request must specify whether information formatted with either EIEP 13A or EIEP 13B is required. If both formats are required, this can be achieved by submitting two requests within the one EIEP 13C. This request must be counted as a single request for the purposes of subclause 11.32(B)(3) if the requests are submitted on the same day.

~~24. Each retailer must ensure that a requesting agent is properly authorised by the relevant consumer before any information is provided to the agent.~~

### What are the timeframes for responding to a request?

Code reference: clause 11.32E

24. Clause 11.32B requires that if a valid request is made a retailer must give the information to the consumer or their agent no later than 5 business days after the date on which the request is made.
25. Where a retailer receives a request via EIEP-13C it must within 2 days of receiving the request undertake all reasonable endeavours satisfy itself that there are no grounds for refusing the request.
26. If the retailer considers, that that there are grounds for refusing the request, the retailer must, before refusing the request:
- (a) consider whether any further information could reasonably be provided by the agent to satisfy the retailer; and
- (b) request any such further information from the agent.
27. A request for further information from an agent must be made within 2 days of the receipt of the request.
28. If a retailer after receiving further information does not consider that there remain any grounds for refusing the request, the retailer must provide the information requested within 5 days as calculated from the time the retailer receives the further information.

### **What format and transfer method must the retailer use to provide consumption information?**

Code reference: clause 11.32F

~~25.~~29. Clause 11.32F(1) requires that the Authority must publicise, and keep publicised, procedures for responding to consumer requests for consumption information.

~~26.~~30. The Authority's published procedures consist of:

- (a) this document

- (b) EIEP-13A, which specifies the electronic format that must be used when providing detailed consumption information electronically to consumers or their agents. This format also provides for the retailer to respond to the agent if the retailer rejects the request.<sup>2</sup>
- (c) EIEP-13B, which specifies the formats that must be used when providing summary consumption information either electronically or in printed form to consumers or their agents. This format also provides for the retailer to respond to the agent if the retailer rejects the request.
- (d) EIEP-13C, which is the electronic request file format that an agent may use to request a consumer's consumption information from a retailer.

~~27.~~31. EIEP-13A, EIEP-13B and EIEP-13C are published on the Authority's [website](#).<sup>3</sup>

### **EIEP-13A: Detailed electricity consumption information for consumers (non-half hour, half hour or sub half hour)**

~~28.~~32. EIEP-13A:

- (a) is an electronic file format used by a retailer to respond to a request from a consumer or its authorised agent for the consumer's consumption information
- (b) is designed as a standardised electronic information exchange format to report a consumer's detailed (eg. HHR or sub half hour) consumption information, as well as a consumer's NHH consumption information, where this information is available to the retailer
- (c) specifies a CSV file format intended for a machine to machine information transfer
- (d) provides for detailed time period consumption information as a date and time series. The difference between the start date and time and end date and time for each record is the period that the reported consumption occurred over
- (e) provides for the retailer to determine that the request is invalid (rejected), and return the EIEP type requested to the requester, with a valid rejection code included that identifies the reason for rejection of the specific ICP request

~~(e)~~(f) is primarily expected to be used by agents but may also be requested by consumers.

~~(f)~~ — ~~Due to their large size,~~ EIEP-13A format files must be transmitted electronically. ~~This includes:~~

(g) ~~via the registry EIEP hub~~ EIE system.

<sup>2</sup> For example, if the requester has incorrectly identified the retailer as having previously supplied the relevant consumer.

<sup>3</sup> See <http://www.ea.govt.nz/operations/retail/eiep/regulated-electricity-information-exchange-protocols/>

~~(h) — by email to a valid email address.~~

~~29.33.~~ 33. To receive consumption information in the EIEP-13A format via the ~~EIEP hub~~ EIE system, a consumer's agent must initially request access to the EIE system ~~EIEP hub~~ from the Authority. If the Authority approves the request, the agent will be required to agree to an access agreement and will be:

- (a) allocated a unique four-character non-participant identifier
- (b) granted SFTP access to the EIE system ~~EIEP hub~~.

~~30.34.~~ 34. For an EIE system ~~EIEP hub~~ transaction, an agent must query their allocated registry outbox to obtain requested consumption information. Further information about the EIE system ~~EIEP hub~~ can be found on the Authority's website in the registry's user manual and the registry functional specification.

### **EIEP-13B: Summary consumption information**

~~31.35.~~ 35. EIEP-13B:

- (a) is an electronic file format used by a retailer to respond to a request from a consumer or authorised agent for the consumer's billed consumption information that the retailer has supplied to the consumer.
- (b) is designed as a standardised electronic information exchange format to report a consumer's summary consumption information
- (c) specifies a CSV file format intended for a machine to machine information transfer and extraction in a printed tabular format.
- (d) provides for summarised NHH consumption information as a date and time series. The difference between the start date and time and end date and time for each record is the period that the reported consumption occurred over
- (e) provides for the retailer to determine that the request is invalid (rejected), and return the EIEP type requested to the requester, with a valid rejection code included that identifies the reason for rejection of the specific ICP request.

~~32.36.~~ 36. The manner in which information will be provided is electronic or hard copy by post, and will be chosen by the consumer ~~or the consumer's agent~~ and may be transferred via either:

~~(a) — the EIEP hub, in the case of a consumer's agent ; or~~

~~(b)~~ (a) a valid email address; or

(b) hard copy posted to the consumer.

37. Where the request for data is received from an agent the EIEP-13A format files must be transmitted electronically via the EIE system ~~EIEP hub~~.

~~(c) —~~



~~33.~~38. The Authority recognises that retailers may wish to develop alternative ways to provide the information contained in EIEP-13B to their consumers. For this reason, EIEP-13B only applies where a consumer has requested the information and the retailer does not already make equivalent information available to consumers, at no cost, via the retailer's web site. If an agent requests EIEP-13B, the retailer must provide EIEP-13B in the manner stated in paragraph 36.

### **EIEP-13C: Electronic request format for EIEP-13A or EIEP-13B**

~~34.~~39. EIEP-13C:

- (a) is an electronic file format used to request consumption information from a retailer
- (b) is primarily designed for use by an agent (which could include another retailer) authorised by the consumer to act on its behalf
- (c) specifies a CSV file format intended for a machine to machine information request
- (d) ~~can~~must be transmitted to the retailer via the EIE system~~EIEP hub~~
- (e) allows an agent to request consumption information for consumers and formatted using either EIEP-13A, EIEP-13B or both .

~~35.~~ If a retailer receives an EIEP-13C-formatted request, the retailer must assure itself that:

~~36.~~40. the EIEP-13C format has been complied with.

~~37.~~ ~~the request is valid in respect of consumer and ICP details~~

~~(a) the requester is properly authorised by the consumer(s).~~

41. If the retailer determines that the request is valid (accepted), it must transmit an electronic file containing the consumption information to the requester, formatted using the requested file format (either EIEP-13A, EIEP-13B or both) within 5 days its receipt.

~~38.~~42. If the retailer determines that the request is invalid (rejected), it must transmit an electronic file containing the rejection information to the requester, formatted using the requested file format (either EIEP-13A, EIEP-13B or both) within 2 business days of the request being made.

~~39.~~

~~40.~~43. The response, whether an acceptance or a rejection, ~~can~~must be transmitted to the requester via the EIE system~~EIEP hub~~.

44. To ensure that a repeat request for information is correctly processed, EIEP-13C contains a field for a unique number termed the "Consumer Authorisation code". This field is conditional, and is only required to be used if the retailer and agent have

agreed a code. The Consumer Authorisation code may provide a time and consumer boundary within the retailer's system, to ensure that only the appropriate information is released.

**Figure 1 – Example timeline showing consumption information that must be held and incorporating a retailer switch**

Note: The example relates to a *new consumer* starting from 1 February 2016.

HOW MUCH CONSUMER CONSUMPTION INFORMATION MUST BE HELD BY A RETAILER?																	
Example Start Date	YYYY	MM	DD	Elapsed months from Start Date	RETAILER A				RETAILER B				CONSUMER INFORMATION ACCESS				
	2016	1	1		Date	Year	Month	Day	Status	Start date of information to be held (inclusive)	End date of information to be held (inclusive)	Maximum number of months of information to be held	Status	Start date of information to be held (inclusive)	End date of information to be held (inclusive)	Maximum number of months of information to be held	Number of months of historic information that can be requested - NB: from switch date, may require consumer requests to both retailers
1/01/16	2016	1	1	0	Retailer A starts supplying the consumer				1/01/16								0
1/02/16	2016	2	1	1					1/01/16	31/01/16	1						1
1/03/16	2016	3	1	2					1/01/16	29/02/16	2						2
1/04/16	2016	4	1	3	Consumer information building up with Retailer A				1/01/16	31/03/16	3						3
-	-	-	-	...					-	-	-						-
1/12/17	2017	12	1	23					1/01/16	30/11/17	23						23
1/01/18	2018	1	1	24					1/01/16	31/12/17	24						24
1/02/18	2018	2	1	25	Steady state operation after consumer has been with Retailer A for more than 24 months				1/02/16	31/01/18	24						24
1/03/18	2018	3	1	26					1/03/16	28/02/18	24						24
1/04/18	2018	4	1	27					1/04/16	31/03/18	24						24
-	-	-	-	...					-	-	-						-
1/01/19	2019	1	1	36	Retailer A stops supplying the consumer				1/01/17	31/12/18	24	Retailer B starts supplying the consumer	none	none			0
1/02/19	2019	2	1	37					1/02/17	31/12/18	23		1/01/19	31/01/19			1
1/03/19	2019	3	1	38					1/03/17	31/12/18	22		1/01/19	28/02/19			2
1/04/19	2019	4	1	39	Consumer information winding down with Retailer A				1/04/17	31/12/18	21	Consumer information building up with Retailer B	1/01/19	31/03/19			3
-	-	-	-	...					-	-	-						-
1/11/20	2020	11	1	58					1/11/18	31/12/18	2		1/01/19	31/10/20			22
1/12/20	2020	12	1	59					1/12/18	31/12/18	1		1/01/19	30/11/20			23
1/01/21	2021	1	1	60	Retailer A obligation to hold consumer information ceases				none	none	0	Steady state operation after consumer has been with Retailer B for more than 24 months. And so on ...	1/01/19	31/12/20			24
1/02/21	2021	2	1	61									1/02/19	31/01/21			24
1/03/21	2021	3	1	62									1/03/19	28/02/21			24