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John Rampton
General Manager Market Design
Electricity Authority
By email: submissions@ea.govt.nz

Dear John

Multiple Trading Relationships

We welcome the opportunity to submit to the Electricity Authority's Multiple Trading Relationships (MTR) consultation, published 28 November 2017.

We support the Authority's consideration of regulatory and commercial barriers that could inhibit consumer choice and competition. We agree current regulatory settings and business models may not be suitable for both future technological changes, and the changes that are currently underway.

The Authority's consultation focuses on how the existing Code could potentially impede competition specifically at the consumer's installation control point. Following submissions, the Innovation and Participation Advisory Group (IPAG) may be requested to consider "how to make multiple trading relationships easier and whether doing so would deliver long-term benefits to consumers." [1.4].

In our view, the MTR issue may be an example or a symptom of a broader problem of access to meter data, so the 'right' solution could be broader than the MTR outcome the consultation paper anticipates. We anticipate access to and use of meter data will become an increasingly important issue with new technology: for example, smart meters, mobile apps, distributed energy sources, home automation.

If the problem is defined incorrectly or too narrowly, then any solution developed may not fully deal with the actual problem or be a solution with the highest net benefit. Enabling MTR, for example, may or may not have positive net benefits; but other elements or additional solutions which could be desirable may be overlooked by the way the problem was framed at the outset.

We would like to see further attention given to ensuring the IPAG's work begins with the right problem definition, including a broader definition framed as access to meter data, before pursuing the project further.

If you have any queries about this submission please contact Micky Cave 04 590 7309.

Yours sincerely

Rebecca Osborne
Regulatory Affairs and Pricing Manager (Acting)