

# Appendix A: Format for submissions

## Terms and Conditions

We will publish your name and organisation (if this applies), but not your contact details. If you think we should not publish any part of your survey response, please tell us which part shouldn't be published and why.

Please note, all survey responses, including parts you've asked not to be published, can be requested under the Official Information Act 1982. This means we would be required to release all surveys in full, unless there was a good reason under the Act to withhold it. We would consult with you if this meant releasing information you asked not to be published.

I understand (select one): Yes ☒ No

Submitter (full name)	<div></div>
Who are you responding as? (select one)	<div><input type="checkbox"/> Consumer</div> <div><input checked="" type="checkbox"/> Innovator or technology company</div> <div><input type="checkbox"/> Small or medium business consumer</div> <div><input type="checkbox"/> Industry participant</div> <div><input type="checkbox"/> Other</div>
Organisation and position (if applicable)	<div></div> Jade Software corporation

Questions	Comments
<p>Q1. What could stop or slow digitalisation of the electricity system? What would make it successful?</p> <p>How far should digitalisation go?</p>	<p>No or limited support from the Electricity Authority would slow the rate of progress. We are impressed with the ideas presented in the “Our future is digital” publication The ideas however will need to be implemented for success to be achieved.</p>
<p>Q2. Do you agree with how we have defined ‘data’ and ‘information’, especially in the context of making data more visible?</p>	<p>Agreed</p>
<p>Q3. What data do you think needs to be more visible?</p>	<p><u>ICP consumption data service (CD SERV)</u></p> <p>To address real-world operational limits which constrain productivity and act as a deterrent to innovation and greater competition we believe ICP consumption data needs to be more visible.</p> <p>Participants perform trial reconciliations on their own systems (for auditing, forecasting, operational reasons). They are necessarily constrained by the information they know about. Consumption metered to a different participant is unknown and any trial/dummy run will not be complete or fully accurate.</p> <p><i>The Challenge of Result Consistency:</i> each participant in their own systems apply EA rules with customised logic which can (and does) produce slightly different results (applying loss factors, profile shape estimations, unmetered load, handling of late data, embedded generation allocation).</p> <p>A CD SERV with standardised rules and logic ensures an even playing field and consistent treatment over reconciliation variables. Greater transparency, especially useful for DG, demand response. Able to provide trial reconciliations on greater granularity (daily... or less).</p> <p><u>ICP state change information in real time</u></p> <p>Real-time visibility to changes in ICP state properties (including switch)</p> <p><u>Location accuracy</u></p> <p>ICP infrastructure GPS location – separation of infrastructure from address (where not co-located)</p>
<p>Q4. What challenges do you think we might face in trying to increase visibility?</p> <p>What considerations need to be given to data privacy or cybersecurity?</p> <p>How could increasing visibility create more opportunities for consumers, participants and innovators?</p>	<p>There are challenges to data privacy and security, participants own different parts of an ICP and this will soon (is already) be broken down to greater granularity.</p> <p>The Registry records participant responsibilities so participants can be restricted based on Registry confirmed roles and relationships.</p> <p>Otherwise, access should be user controlled rather than provider controlled.</p> <p>A solution could be implemented which would involve:</p> <ul style="list-style-type: none"> <li>• A centralised system gated by Registry roles</li> <li>• End user access via short lived tokens rather than a pre-issued key (alternatively an end user may set their data as “open view”, or as “open view prescribed” for prescribed agents which may include AI agents)</li> </ul>

Questions	Comments
	<ul style="list-style-type: none"> <li>• Agent/3<sup>rd</sup> party access only when granted by a user</li> <li>• Simple and easy for a customer to use</li> </ul>
<p>Q5. What work are you planning or doing to increase visibility within the electricity system?</p> <p>Are you aware of any work that contributes to this goal?</p>	<p>Registry roadmap includes Real-time sharing of ICP state-change data as a key initiative.</p> <p>We are working with a range of industry participants exploring both the challenges and benefits of implementing a centralised consumption data service.</p>
<p>Q6. What challenges do you think we might face in increasing interoperability?</p> <p>What other opportunities do you think greater interoperability will bring?</p>	<p>Technically we believe there are few challenges to increasing interoperability. However, any digital change regardless of benefits typically encounters some level of objection. Many people, possibly most people, fear risk. Change introduces uncertainty and uncertainty means risk. Organisations will need to be provided with information that educates and inspires to help them make the transition.</p> <p>Greater interoperability creates the opportunity to automate and improve productivity for all involved. Additionally automated real time data flows foster innovation and can lead to the development of new product and service offerings.</p>
<p>Q7. What work are you planning or doing to increase interoperability within the electricity system?</p> <p>Are you aware of any work that contributes to this goal?</p>	<p>We are investigating the opportunity to implement a real time consumption data service. This would be a major interoperability initiative enabling a wide variety of authorised industry participants to view electricity consumption data in real-time.</p>
<p>Q8. What challenges do you think we might face in simplification?</p> <p>How could simplifying create more opportunities?</p>	<p>Ironically simplification can be very complex to achieve particularly at scale because of the wide variety of systems, processes, and technologies that exist combined with users increasing expectation of personalisation.</p>
<p>Q9. What work are you planning or doing to increase simplification within the electricity system?</p> <p>Are you aware of any work that contributes to this goal?</p>	<p>Compiling an omnibus of improvements to the registry that should not require changes to the code including</p> <ul style="list-style-type: none"> <li>• Improved UI including data quality dashboards and alerts</li> <li>• Additional/updating APIs</li> <li>• Downloadable templates for bulk actions</li> <li>• Event and property level change logs and timelines (drilling down to attribute changes over time)</li> <li>• Webhooks (instant alerts for ICP state changes – no polling required) simpler integration, complimentary to a real-time event stream.</li> </ul>
<p>Q10. Do you have any other comments on this paper?</p>	<p>We are totally supportive of the future direction inspired by this paper</p>