

Registry Access Policy

Version 1.7

18 April 2019

Version control

Version	Date amended	Comments
1.3	13/03/2007	Original Document (Electricity Commission)
1.4	15/10/2013	Updated to include Meter Equipment Providers
1.5	5/11/2014	Updated to clarify conditions of access
1.6	1/3/2016	Added a Connection Data API clarification to the Overview
1.7	18/04/2018	Updated to apply to general registry access

Overview and disclaimer

This document sets out the policy the Electricity Authority (Authority) follows when considering applications for access to the registry. The document reflects the Authority's view.

The information contained in this policy should not be used instead of legal advice.

If there is any inconsistency between this policy and the Electricity Industry Participation Code 2010 (Code), the Code takes precedence.

This registry access policy does not apply to registry users' access to the "ICP Connection Data API" (<https://emi.portal.azure-api.net/Products/56a92b7074ff88075485e86b>) or to the use of data obtained from that source.

Glossary of abbreviations and terms

API	Application Programming Interface
Authority	Electricity Authority
Code	Electricity Industry Participation Code 2010
EIEP	Electricity Information Exchange Protocol
ICP	Installation Control Point
MEP	Metering Equipment Provider
SFTP	Secure File Transfer Protocol

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1. Introduction

- 1.1 Traders, distributors, the reconciliation manager, and metering equipment providers require registry access to fulfil their obligations under the Code.
- 1.2 This document sets out the terms and conditions under which the Authority grants access to the registry.
- 1.3 Further information on the registry is available on the Authority's website at <http://www.ea.govt.nz/operations/retail/the-registry/about-the-registry/>.

2. An overview of the registry

The registry facilitates customer switching and reconciliation

- 2.1 The registry is a “24 by 7” system that contains information on every installation control point (ICP) in the New Zealand electricity industry. The registry is the electricity industry’s national database of record for all ICPs. The registry is the primary mechanism for processing the switching of customers between electricity retailers. The registry is also an important source of information to support reconciliation of electricity quantities.
- 2.2 The registry’s main processes are:
- (a) the maintenance and validation of ICP information, both current and historical, via online and batch functions
 - (b) a notification facility that advises all affected participants of changes made to ICP information
 - (c) a delivery mechanism for the switching protocols and electricity information exchange protocol (EIEP) files
 - (d) the provision of ICP look-up facilities to authorised participants, both online and in batch (file) mode
 - (e) the provision of reconciliation reporting
 - (f) the provision of compliance reporting, including information for investigations and audits
 - (g) the management of discrepancies between participant back-office systems and the registry.
- 2.3 The Code defines which participant is responsible for providing information about specific ICP attributes, and the timeframes within which the information must be provided.
- 2.4 The registry provides information for the following activities that are not regulated by the Code:
- (a) network charging
 - (b) consumer invoicing.
- 2.5 The registry also has:
- (a) an encrypted data hub, which enables the exchange of data between registry users
 - (b) an API, which enables registry users to automatically communicate with the registry’s database management system to access connection data.

Additional information

- 2.6 Further information on the registry is available on the Authority's website at: <http://www.ea.govt.nz/operations/retail/the-registry/>
- 2.7 Please contact the Authority if you require any further information about the registry:

Electricity Authority

PO Box 10041

Wellington

Attention: **Manager Market Operations**

Telephone: 04 460 8860

Fax: 04 460 8879

Email: marketoperations@ea.govt.nz

3. An overview of access to the registry

Applications for registry access

- 3.1 Clause 11.28 of the Code outlines the process for granting access to the registry. Participants who want to access the registry must apply to the Authority. If the Authority grants a participant's application, it must specify the terms and conditions under which access to the registry has been granted. The participant and the registry manager must comply with these terms and conditions.
- 3.2 Under clause 11.28(3), the Authority may propose amendments to the terms and conditions, and must consult with affected participants on any such proposals. Participants must comply with the terms and conditions, as amended.
- 3.3 The Authority can also grant non-participants access to the registry. This policy governs the granting of registry access to non-participants.

Categories of access

- 3.4 The Authority may grant three categories of access to the registry:
 - (a) access to non-participants who require access to the registry for regulatory, law enforcement, or investigation purposes
 - (b) access to participants for the purposes of fulfilling their Code obligations
 - (c) electricity industry regulator (regulator) access.

Payment for registry access

- 3.5 Payment for use of the registry is included in the electricity industry levy. The method of cost allocation is described in the Electricity Industry (Levy of Industry Participants) Regulations 2010. Currently registry related costs are allocated as follows:
 - (a) non-participant registry users – no charge
 - (b) participant registry users – costs are allocated between distributors and traders that have their participant identifier recorded on ICPs in the registry.
- 3.6 The registry manager may elect to offer services additional to the requirements set out in the registry functional specification to any person, only if providing the additional services:
 - (a) does not conflict with, or breach, either the Code or the service provider agreement between the registry manager and the Authority

- (b) only allows a requesting participant to utilise registry information relating to an ICP while the requesting participant is responsible for the ICP.

Authority obligations

- 3.7 The Authority publishes in the registry functional specification the method of registry operation and processes.
- 3.8 Once the Authority approves access to the registry, the access is managed by the registry manager by:
- (a) allocating one user per participant, identified as a 'supervisor user' (the supervisor user can assign access to the registry, to any person within the participant's organisation, under the same permissions that the supervisor has)
 - (b) restricting activity:
 - (i) to read only, or read and write
 - (ii) by imposing a concurrent user cap, if requested to do so by the Authority
 - (iii) by imposing a maximum time out period when a registry session is unused.
- 3.9 The Authority must monitor registry usage and, if the number of concurrent users adversely affects registry performance, may apply a concurrent user cap that limits, by registry user, the number of concurrent users that may use the registry.
- 3.10 The Authority determines access permissions to the registry for each type of participant and has set these out in the registry functional specification:
- (a) non-participant registry users are configured as having read only access permission
 - (b) participant registry users are configured by participant type, with read/write access for information in respect of which the participant has Code obligations
 - (c) regulator registry users:
 - (i) the Authority will have read/write access
 - (ii) other regulator users will have read only access.
- 3.11 Participant access – the Authority will grant a participant with sufficient access to the registry to allow that participant to fulfil its Code obligations, but with permissions that prevent it interfering with any other participant's Code obligations. The registry also automatically

blocks access for record updates that are not in accordance with the access granted by the Authority.

3.12 Non-participant access – the Authority may, at its sole discretion, grant non-participant access to the registry, but with permissions that will prevent any non-participant from interfering with any participant's Code obligations. In considering applications for non-participants to have access, the Authority:

- (a) will consider each application on its own merits, taking into account the Authority's statutory objective and the end use of the registry information
- (b) will not grant access if registry information is wanted for marketing purposes
- (c) will grant access if access to the registry is required under other legislation.

3.13 When allowing access to the registry, the registry manager must:

- (a) not allow access to the registry to any person without the prior written consent of the Authority
- (b) only allow access to the registry on the terms and conditions advised by the Authority, which includes access permissions
- (c) ensure that the system maintains the integrity of each participant's information by allowing only those parties that have been granted authority by participants to access the registry on their behalf (by the exchange of digital certificates and/or password authentication) to change or enter information in the registry
- (d) allow access to parties that have been granted agent access by registry users, to access the registry on that registry user's behalf by exchange of digital certificates and/or password authentication.

3.14 Registry users will access the registry via one or more of the following methods:

- (a) Web browser: unrestricted access and search capability for registry information that is only available for a selected single ICP
- (b) File access via SFTP: requests and reports provided to and from the registry:
 - (i) if ICP identifiers are provided by the registry user, all registry information
 - (ii) if ICP identifiers are not known, limited to information for those ICPs where the participant identifier that is generating the request has ownership of the ICP

- (c) Web services: unrestricted view access and search capability for registry information that is only available for a selected single ICP.

3.15 The registry manager must permit updates to registry information (write access) only if the participant identifier assigned to the registry user has ownership of the ICP recorded in the registry. In such cases, the registry manager will restrict access as follows:

- (a) To only the fields that a participant type is permitted to update as required in the Code and also as detailed in the registry functional specification.
- (b) To only the time period that a participant has responsibility for registry information. This is determined by:
 - (i) the participant "owning" an ICP, ie, the participant identifier is recorded within the registry against the ICP identifier
 - (ii) the participant being a new metering equipment provider (MEP) to an ICP, in which case it has been nominated as the MEP and it has accepted the nomination
 - (iii) the participant being responsible under the Code for other registry information such as information in static data tables.
- (c) The registry must have business rules to enable a participant to "inherit" certain information about an ICP when the participant becomes responsible for the ICP. This inheritance is set out in the registry functional specification, and participants should be aware of inheritance of certain information by becoming familiar with the registry functional specification.

4. Terms and conditions under which access is granted

4.1 Clause 11.28 of the Code requires the Authority to specify terms and conditions under which access to the registry is granted.

4.2 The following terms and conditions apply to all registry users:

- (a) each registry user:
 - (i) must comply with the requirements of the Code and the registry functional specification, including:
 - taking all practicable steps to provide complete and accurate information to the registry
 - correcting any inaccuracies in registry information as soon as practicable
 - (ii) must use a participant or a four letter identifier provided by the Authority unique to that registry user in their registry transactions
 - (iii) must not attempt to gain inappropriate access to the registry, where “inappropriate access” means access:
 - by means other than the access approved under this policy
 - for gaining a commercial advantage over another participant if the consumer has not initiated contact
 - for marketing, cold calling, direct marketing, or any other form of participant initiated contact with potential customers
 - (iv) is solely responsible for the action of any other person that the registry user has allowed to access the registry through its licence and must ensure that the registry is not accessed inappropriately
 - (v) must not impede any participant's access to information within the registry, or the ability of any participant to update relevant information in the registry (this includes excessive requests for reports from the registry that overload the registry and cause delays in its operation)
- (b) a participant must not access registry records for an ICP for which the participant is not responsible unless:
 - (i) the participant is a trader and the prospective customer at that ICP has initiated contact with the participant

- (ii) the participant was previously responsible for the ICP, and is querying or amending registry records in respect of their period of responsibility for the ICP
 - (iii) the participant is an MEP and the trader responsible for the ICP has arranged for the participant to become the MEP for the ICP
 - (iv) the participant is a distributor and there is an arrangement for the ICP to switch from the existing distributor to the participant
- (c) if a registry user does not comply with terms and conditions for registry access or interferes with another participant's access to the registry, the Authority may, at its sole discretion, carry out any of the following:
- (i) in the case of a non-participant:
 - revoke some or all registry access; or
 - impose changed permissions that will prevent the possibility of further interference
 - (ii) in the case of a participant:
 - impose changed permissions that will prevent the possibility of further interference
 - impose limitations on the access or types of data the participant can access
 - require it to fulfil its Code obligations through a nominated agent
 - allege a breach of the Code against the participant.

Relevant legislation

4.3 Clause 11.28 provides that:

- (a) participants may apply to the Authority for access to the registry
- (b) if the Authority grants a participant's application, the Authority must specify the terms and conditions under which access to information is to be provided
- (c) the participant must comply with the terms and conditions
- (d) the registry must provide the participant with access to information held in accordance with those terms and conditions.

4.4 The information contained in the registry is subject to the Official Information Act 1982.

- 4.5 Participants should ensure that they do not enter “personal information” (as defined in the Privacy Act 1993) into the registry, especially in free text fields. If participants do include personal information in the registry, it will be subject to the Privacy Act.