



14 November 2023

Electricity Authority  
Level 7 AON Centre  
1 Willis Street  
Wellington 6011

[DDA@ea.govt.nz](mailto:DDA@ea.govt.nz)

**Proposed changes to the default distributor agreement template, consumption data template, and related Part 12A clauses – Join submission by MainPower New Zealand Limited and Marlborough Lines Limited.**

MainPower New Zealand Limited (MP) and Marlborough Line Limited (MLL) thanks the Authority for the opportunity to make this submission.

Nothing in this submission is considered to be sensitive and the whole submission can be published.

This submission provides commentary on the consumption data template portion of the consultation as it relates to MP and MLL. This consultation does not provide a joint response to the DDA portion of the consultation as MP utilises the conveyance model and does not currently engage with traders using a DDA.

- While we support the intention to allow distributors to obtain data directly from MEP's and merge data sets on a more regular basis, we do not agree with the Authority's decision not to expand the proposal to include the provision of other ICP data used for network purposes.
- We believe that the Authority's decision to not require MEPs to supply data to distributors at the marginal cost of provision runs contrary to the Authority's stated objective in the Executive Summary to reduce costs on distributors.
- We do not agree with the Authority's comments in relation to a metering data repository, and the associated high costs of establishment, being the alternate data access option available. We are aware of other options, including API gateways, and

recommend the Authority consider seeking software architecture advise on alternative options in its wider data access review.

Please do not hesitate to contact Sarah Barnes (MainPower) should you have any questions.

Yours faithfully



Sarah Barnes  
GM Commercial (Acting)  
Telephone: 027 886 1793  
Email: [sarah.barnes@mainpower.co.nz](mailto:sarah.barnes@mainpower.co.nz)



Scott Wilkinson  
Commercial Manager  
Telephone: 021 192 5073  
Email: [scott.wilkinson@mll.co.nz](mailto:scott.wilkinson@mll.co.nz)