

Improving retail market monitoring: clause 2.16 information notice

Consultation paper

5 December 2023

Executive summary

The Electricity Authority Te Mana Hiko (Authority) actively monitors the electricity market's behaviour and performance through the collection of information from electricity industry participants (participants). As a modern regulator, we develop insights based on accurate data. Grounding our work in these insights contributes to timely, effective, and evidence-based decisions which have long-term benefits for consumers and contribute to protecting small business and domestic consumers' interests (where these are involved). This is important for responsively regulating a rapidly changing electricity industry.

Our active monitoring programme includes the publication of data, information, and tools to increase participation, and improve awareness of how the electricity markets function. A key component of this work is appropriate monitoring of the retail market. To achieve this, we are consulting on a project to improve our monitoring of the retail market and domestic and small business consumer outcomes.

This project would support monitoring of the retail market, and measures relevant to:

- The Authority's main statutory objective to promote competition, reliability, and efficiency in the retail market for the long-term benefit of consumers.
- The Authority's additional statutory objective to protect the interests of domestic and small business consumers in their dealings with participants in relation to their electricity supply.¹

It will also allow monitoring of the operation and effectiveness of the Authority's Consumer Care Guidelines (Guidelines).²

Our existing mechanisms for collecting retail market data are insufficient to adequately monitor the retail market, consumer outcomes, and the effectiveness of the Consumer Care Guidelines. We have limited reliable information available on a range of retail market areas, notably around retail pricing and outcomes for domestic and small business consumers such as arrear levels, disconnections, and fees.

Some stakeholders are concerned about our current retail market data collection mechanisms. These concerns include that:

- the mechanisms contain overlapping questions which impose unnecessary costs on participants
- some questions can be interpreted in various ways
- we do not publish the retail market data we collect.

To address the above issues, we propose a new ongoing information notice for retail market data made under Clause 2.16 of the Electricity Industry Participation Code 2010 (Code). Clause 2.16 allows us to publish a notice specifying information a participant must provide to assist us with our monitoring functions. The new notice would replace existing retail market

¹ The Authority's statutory objectives are set out in section 15 of the Electricity Industry Act 2010.

² The Authority's Consumer Care Guidelines are available at <https://www.ea.govt.nz/documents/2093/Consumer-Care-Guidelines.pdf>

data collection mechanisms, such as the Retailer Financial Stress notice³ and quarterly and annual voluntary retail data collections, and instead ask for a comprehensive set of retail market data.

All retailers, as defined in the Electricity Industry Act 2010 (Act),⁴ would be asked to supply data from mass market customers including any account managed small businesses. We intend to publish metrics developed with data from this new notice in monitoring reports such as the quarterly market performance review, and on our Electricity Market Information website (EMI).

The data we receive through the proposed notice would enable greater understanding of the retail market, better monitoring of current policy interventions, and support better evidence-based policy making in the future. This would enable us to make more effective interventions, if necessary, in the retail market to deliver desired consumer outcomes, such as ensuring customers understand and have good access to time of use (TOU) plans, protecting small business and domestic consumers more generally, and ensuring consumers can benefit from competition through switching retailers.

The Authority is seeking your feedback on:

- our description of current issues with monitoring of the retail market
- the disestablishment of existing mechanisms for collecting retail data in favour of a new singular request (proposed notice under clause 2.16)
- whether the content of the proposed clause 2.16 notice meets our aim to improve market monitoring, particularly in relation to competition, reliability, and efficiency in the retail market, and of domestic and small business consumers' outcomes
- whether the benefits of collecting this data outweigh the costs incurred by the proposed clause 2.16 notice
- whether the proposed two month implementation period provides sufficient time for retailers to update internal data systems for a new information notice.

We will use feedback on the likely costs and benefits of the proposed notice to inform a more detailed assessment of those likely benefits and how much they are expected to outweigh the likely costs. We intend to release a second consultation with a two-week submission period on this updated analysis in early 2024. We will communicate the timing of this consultation to all relevant industry and consumer stakeholders closer to its release. Pending completion of this consultation and analysis of submissions we expect to make final decisions on publishing a new notice by mid-2024. If a decision is made to proceed there will be a two-month implementation period.

We acknowledge some of the information we are requesting under the proposed notice is at an Installation Control Point (ICP) level and it may be possible to link this to an identifiable individual or group of individuals. We are implementing enhancements to our policies and procedures to prepare for receipt of information under the new notice and will ensure robust

³ The Retailer Financial Stress notice is available at https://www.ea.govt.nz/documents/1917/Retailer-Financial-Stress-Notice_sviPhtQ.pdf

⁴ Section 5 of the Act defines 'retailer' as a business engaged in retailing, and 'retailing' as the sale of electricity to a consumer other than for the purpose of resale.

data security and privacy policies are in place to address any information security and privacy considerations.

Participants may also identify confidential information provided through the proposed notice. We will follow the transparent process for handling this confidential information as set out in clause 2.22 of the Code. We intend to release a full Privacy Impact Assessment for the proposed notice alongside our secondary consultation focused on costs and benefits.

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1. What you need to know to make a submission

What the paper is about

- 1.1. Robust retail market monitoring is required to deliver the Authority's key strategic goals for the retail market and contributes to our role as a modern, data driven regulator that acts based on a clear understanding of the retail sector's interaction with different consumer cohorts.
- 1.2. Current mechanisms for collecting retail market data are a mixture of mandatory requests, and voluntary requests with variable response rates. This means we have limited reliable information available on a range of retail market areas, notably around retail pricing and outcomes for domestic and small business consumers such as arrears levels, disconnections, and fees.
- 1.3. Retailers have also raised concerns that current mechanisms concerning retailer and consumer financial stress data contain overlapping questions, and that we do not currently publish the data we receive or show how we use that data. Other stakeholders, including consumer advocacy groups, have stated that our retail market monitoring is not sufficient to monitor domestic consumer outcomes.
- 1.4. To address these issues, we propose a new ongoing, consolidated, and mandatory request notice for all mass market and account managed small business customer information from all retailers, as defined in the Act. To increase transparency, we intend to publish this information at an aggregated level on a regular basis. Subject to this consultation and completing our assessment of the likely benefits and costs, our current view is that a new notice under clause 2.16 of the Code provides the most appropriate mechanism to make this request.
- 1.5. The purpose of this paper is to consult with interested parties on the proposed clause 2.16 notice regarding the content of the notice, and whether it meets our aim to improve monitoring of the retail market, and associated domestic and small business consumers' outcomes. Depending on the outcome of this consultation, we will use insights from this consultation to inform a second shorter consultation containing an updated analysis of the likely benefits and costs.
- 1.6. There are information security and privacy considerations relating to the proposed notice, and the paper provides an overview of the measures we will undertake to meet best practice and ensure the protection of consumers' personal information, as required under the Privacy Act 2020 (the Privacy Act). A Privacy Impact Assessment for the proposed notice will be published alongside our secondary consultation on likely benefits and costs.

How to make a submission

- 1.7. The Authority's preference is to receive submissions in electronic format in the format shown in Appendix B. Submissions in electronic form should be emailed to retaildata@ea.govt.nz.
- 1.8. We intend to publish all submissions we receive. If you do not want us to publish any part of your submission, please:
 - indicate which part should not be published

- explain why you consider that part should not be published
 - provide a version of your submission that can be published (if we agree not to publish your full submission).
- 1.9. If you indicate there is part of your submission that should not be published, staff will discuss with you before deciding whether to not publish that part of your submission.
- 1.10. However, please note that all submissions the Authority receives, including any parts that are not published, can be requested under the Official Information Act 1982. If that is the case, we would be required to release material that we did not publish unless good reason existed under the Official Information Act to withhold it. We would normally consult with you before releasing any material that you said should not be published.
- 1.11. If a retailer wishes to clarify or discuss details of the proposed notice during the submission period, they are welcome to arrange a meeting with Authority staff by emailing retaildata@ea.govt.nz.

When to make a submission

- 1.12. Please deliver your submissions by **5pm** on 13 February 2024.
- 1.13. We will acknowledge receipt of all submissions electronically. Please contact us (info@ea.govt.nz) if you do not receive electronic acknowledgement of your submission within two business days.

2. Current state of retail market monitoring at the Authority

Active monitoring of the retail market ensures industry participants are accountable, and provides for market transparency and education

- 2.1. We have a statutory function under section 16(1)(f) of the Act to undertake market-facilitation measures and to monitor the operation and effectiveness of market facilitation measures. Market monitoring and carrying out and making publicly available reviews, studies, and inquiries into matters relating to the electricity industry is also one of our required functions, under section 16(1)(g) of the Act.
- 2.2. Active market monitoring ensures electricity industry participants are accountable, provides us with an understanding of the electricity market's behaviour and performance, and can supply evidence for appropriate enforcement when necessary.
- 2.3. Publishing monitoring data allows us to create an environment of market transparency. It raises awareness regarding the operation of the electricity market, such as how retailers and other industry participants deal with domestic and small business consumers, including medically dependent and vulnerable consumers.

- 2.4. Current retail market monitoring mechanisms can monitor some retail market facilitation measures but could be more comprehensive to better support our functions under the Act.

The Authority currently receives retail market related data through multiple mechanisms.

- 2.5. We currently receive information relevant to the retail market across multiple data collection mechanisms. The information collected through these mechanisms falls into two data categories:
- retailer and consumer financial stress data
 - registry and consumption data.

Retailer and consumer financial stress data

- 2.6. We collect information on retailer and consumer financial stress primarily through three different mechanisms summarised below.

Retailer Financial Stress notice

- 2.7. We currently receive monthly data through a mandatory notice made under clause 2.16 of the Code called the 'Retailer Financial Stress notice' (RFS notice).⁵ Clause 2.16 allows us to publish a notice specifying information that a participant must provide to us either on a regular basis or as a result of an identified event (Section 5 of this paper contains more detail on a clause 2.16 notice).
- 2.8. The RFS notice has been in place since October 2022, and consolidated and replaced a COVID-19 focused information request (the COVID-19 request) that collected information on retailer and customer stress during the COVID-19 pandemic.⁶ The COVID-19 request was made under Section 46 of the Act and ended in September 2022.⁷
- 2.9. The RFS notice collects aggregated information from retailers with more than 1,000 ICPs⁸ on a monthly basis regarding debt, disconnections for non-payment, and deferred payment plans. The data collected through this mechanism is aggregated information (ie, not ICP level data).

Consumer Care Guidelines voluntary monitoring information

- 2.10. The Authority's Guidelines help ensure retailers deliver a consistent and supportive minimum standard of care to domestic consumers through recommended actions.

5 Further information on the Retailer Financial Stress notice is available here:
<https://www.ea.govt.nz/projects/all/retailer-financial-stress-data-request/>

6 The COVID-19 request is available here: <https://www.ea.govt.nz/documents/2895/26652Information-request-Section-46-on-consumer-debt-and-disconnections.pdf>

7 Section 46 of the Act provides the Authority with monitoring, investigation, enforcement and review powers for the purposes of undertaking its monitoring, investigation, enforcement, and review functions outlined in section 45 of the Act.

8 The RFS notice applies to retailers with 1,000 ICPs recorded on the registry on the last calendar day of the reporting month.

- 2.11. We collect quarterly monitoring information, under Part 10 of the Guidelines, to monitor the Guidelines' intended outcomes. This request is voluntary and collects aggregated information from all retailers (as defined in the Act) on domestic customer debt, disconnections for non-payment, number of medically dependent consumers, and referrals to Work and Income. We have not proactively requested this information since Quarter 2 2022 primarily due to overlapping questions with the RFS notice.
- 2.12. This request replaced a quarterly voluntary data request that tracked disconnections and medically dependent and vulnerable consumer information, which was collected since 2006.⁹
- 2.13. Under Part 10 of the Guidelines, we also collect retailers' consumer care policy and alignment statements on an annual basis (for the period 1 July – 30 June). Retailers have voluntarily provided statements declaring their alignment with the Guidelines for the two periods since the implementation of these recommendations. As part of the latter submission, retailers also provided all customer care policies applicable to the alignment period. This collection process will continue alongside the clause 2.16 notice proposed in this paper.

Annual voluntary interest area request

- 2.14. An annual voluntary data request operated from 2011 until 2021, asking retailers questions that varied depending on our interest areas (the annual voluntary interest area request). These questions included innovations in retail offerings, market share, the extent of controllable offtake and injection, and the use of prepaid and flexible payment contracts. Some of this data was aggregated and some was at an ICP level.

Registry and consumption data

- 2.15. The Electricity Registry (Registry) is a database containing information on every ICP to which a consumer or embedded generator is connected and facilitates the exchange of information between retailers, metering equipment providers and distributors to manage reconciliation, invoicing, and switching processes.
- 2.16. The Registry is managed by Jade Software Corporation on behalf of the Authority and participants are required by the Code to populate the Registry with detailed ICP level information such as grid exit point, address, loss factors, meter serial numbers, ICP status, etc. Information from the Registry enables us to monitor some aspects of the retail market including consumer switching, retailer market share, and installed distributed generation. We do not intend for information proposed to be collected under the notice proposed in this paper to overlap with information captured on the Registry.

⁹ This was used to monitor the Electricity Commissions' 'Guideline on arrangements to assist low-income domestic consumers' made in November 2005 (Available at https://www.ea.govt.nz/documents/2897/Guideline_on_arrangements_to_assist_low_income_domestic_consumers.pdf) and later the 'Guideline on arrangements to assist low income and vulnerable consumers' made in January 2008 (available at https://www.ea.govt.nz/documents/2896/Guideline_on_arrangements_to_assist_medically_dependent_consumers_2009.pdf).

- 2.17. We also capture ICP level monthly consumption data from the electricity information exchange protocol No.1 (EIEP1) when retailers and distributors exchange information through the Registry Transfer Hub to inform different charges. This information is provided voluntarily with the consent of the exchanging parties and covers around 94% of residential ICPs.¹⁰
- 2.18. Registry data forms the basis of charts on EMI and the quarterly market performance reviews. Information is published on an aggregated basis so that data is anonymised. EIEP1 data is not published on EMI.

The Authority now has an additional statutory objective

- 2.19. Our new additional objective, under section 15(2) and 15(3) of the Act, came into force on 31 December 2022. We are required to protect the interests of domestic consumers and small business consumers in relation to the supply of electricity to those consumers, specifically in relation to the dealings of these consumers with industry participants.
- 2.20. We were also given a new function, under section 16(1)(ia) of the Act, to undertake measures aimed at protecting the interests of domestic and small business consumers in relation to the supply of electricity by industry participants.
- 2.21. We implemented current monitoring mechanisms, outlined in the previous section of this paper, before the additional objective came into effect. We are therefore considering what monitoring may be appropriate to support our additional objective.
- 2.22. For the purposes of this project, we have placed particular focus on improving retail market monitoring regarding retailers who supply electricity to domestic and small business consumers. This focus excludes:
- information that other industry participants (such as distributors and metering equipment providers) may hold about these consumers. Distributors do not hold information of interest for this project that retailers are unable to supply.
 - information about large industrial and commercial customers already captured by our existing Hedge Disclosure Obligations¹¹ and Wholesale Market Information Disclosure Obligations.¹² This retail data project is intended to monitor remaining customers and information not covered by these obligations. However, we may revisit this once we complete other work on Hedge Disclosures.

¹⁰ Further information on the EIEPs and how they work is available here:
<https://www.ea.govt.nz/industry/retail/eieps/>

¹¹ <https://www.ea.govt.nz/industry/wholesale/hedge-market/#:~:text=Industry%20participants%20need%20to%20disclose,to%20better%20understand%20the%20market>

¹² <https://www.ea.govt.nz/industry/wholesale/hedge-market/#:~:text=Industry%20participants%20need%20to%20disclose,to%20better%20understand%20the%20market>

Alongside this consultation the Authority is progressing potential changes to the Consumer Care Guidelines

- 2.23. We are currently in the process of considering options to update and strengthen the Guidelines.
- 2.24. We held a public consultation between 4 September and 2 October 2023, inviting stakeholders and consumers to provide their feedback on a consultation paper setting out options to update and strengthen the Guidelines.¹³ We excluded from that consultation any changes to Part 10 of the Guidelines, which contains recommendations regarding monitoring of consumer outcomes and retailer guideline alignment, as those issues are being considered through this paper.

3. The problems this project is solving

Current data collection is inadequate to monitor aspects of the retail market

- 3.1. Monitoring contributes to trust and confidence in the market by making market activities transparent to participants, consumers, and other interested stakeholders. Data that is currently being collected is either unable, or inadequate, to capture the full range of these activities and to highlight the market outcomes that matter to consumers. The data that this paper proposes collecting would enable these outcomes to be effectively monitored.
- 3.2. The COVID-19 pandemic showed that collecting retailer and consumer financial stress data was necessary to monitor and understand consumer outcomes as part of market monitoring, and the specific process outlined above in paragraph 2.8. was put in place. However, the data collected was only adequate to monitor strains on the electricity market during this specific and unusual period.
- 3.3. We need a more extensive set of data to build a complete, long-term picture of how the retail market is functioning under business-as-usual conditions, as well as during times of economic stress. Monitoring the market across a range of economic conditions and publishing retailer and consumer outcomes using the expanded scope of the proposed notice should help build trust and confidence in the retail market. This benefits consumers in the long term as it helps ensure a competitive and efficient retail market.
- 3.4. The transition to a renewable power system will require consumer participation through distributed energy resources. The information we collect under the proposed notice would contribute to our monitoring of the electricity industry by helping to build understanding of the opportunities for distributed energy resources. This would benefit consumers as the owners of these resources, and in the longer term help support a sustainable electricity system.
- 3.5. Within the data collection mechanisms noted above in Section 2 of this paper, we identified significant gaps in the information necessary to monitor aspects of retail market competition, reliability, and efficiency, and domestic and small business

¹³ The consultation paper can be found at https://www.ea.govt.nz/documents/3666/Consumer_Care_Guidelines_consultation_paper.pdf

consumer outcomes. Table one below outlines these key gaps, and what filling these gaps would help us understand:

Table one: Key information gaps

Key information gaps	Filling this gap would help us understand
Monitoring of retail market competition, reliability, and efficiency	
Monthly billing data by ICP, including plan type, fees, discounts, rate/cost per kWh, and contract length.	Fees, penalties, and average \$/kWh price paid under different plans. Connecting this data with geographical area and population demographic information from Statistics NZ would enable us to establish a complete picture of prices and contract conditions across, and therefore better monitor, the retail market, and particularly competition in it.
Half hourly consumption metering data of mass market and any account managed small business customers linked to retail tariffs, to assist in monitoring the application of time of use (TOU) pricing plans load control; and, where appropriate, export rates and revenue.	Consumption patterns (eg, peak vs off-peak) of different consumer cohorts. Extent of consumption for EV specific plans, TCP plans and solar export plans. How prices for these plans are affecting consumer behaviour and the outcomes for consumers who are exporting power, as part of monitoring competition and its effects in the retail market as well as aspects of reliability. These types of demand response consumption are a known growth area within the retail market that we are currently unable to monitor.
How the bundling of electricity and other services is being applied by retailers.	Growing trend across the retail market to offer consumers electricity bundled together with other utilities such as gas/LPG, internet, and mobile phone services under the one plan. Monitoring these utility prices would help us track: how bundled plans may affect consumer price incentives around electricity and the impact they may have on competition in the retail electricity market; and how debt arising out of electricity charges is managed when those charges are bundled with other services. We note that the Commerce Commission is also considering bundling issues in relation to telecommunications services.
Relationship of consumer switching to ICP tariff rates and plans, and specific linkages to the representation of plans on the Powerswitch website.	Average savings that consumers achieve by switching and track the popularity of different types of plans, including TOU plans, in the retail market, in order to assess the effectiveness of market-facilitation measures, including those aimed at promoting to consumers the benefits of plan comparison and consumer switching (being another of our functions under section 16(1)(i) of the Act). Only a small portion of known switches are generated through Consumer NZ's Powerswitch website ¹⁴ . Monitoring switching rates and plan uptake,

¹⁴ The Authority provides financial support to Consumer NZ's Powerswitch website and collects data on the switching results generated through this service. These represent a small proportion of all consumer switches that occur in the retail market. As stated above, we also collect switching information through the Registry when an ICP changes between retailers. Collecting tariff rate and plan information can supplement this Registry data to help us understand the potential consumer savings linked to each switch.

	generated both through Powerswitch and outside of this service, can provide us with a more complete understanding of how consumers are responding to price incentives and market competition.
Monitoring of domestic and small business consumer outcomes, including monitoring the operation and effectiveness of the Guidelines	
Being able to distinguish data applicable to subsets of consumers such as small businesses, prepay customers, medically dependent consumers, and customers in arrears.	How these groups' outcomes differ to other consumers, as part of our monitoring of the market and promotion of our objectives. How retailer behaviour towards the residential subset of consumers aligns with recommendations in the Guidelines regarding disconnection and assistance.
Data at an ICP level on timeframes for reconnection after disconnection for non-payment; actions taken by retailers to assist customers in payment difficulty; accumulated debt (arrears); and disconnection, reconnection, and arrears management fees.	Amount of time consumers spend without power when disconnected for non-payment. How retailers are implementing and following certain recommendations in the Guidelines regarding reasonable fees, disconnection processes (including the method of disconnection eg, carried out remotely through a smart meter or via a physical site visit), and helping those in payment difficulties, as part of our monitoring of the effectiveness of the Guidelines as a market-facilitation measure.
Data at an aggregate level on complaints and refusal of service due to creditworthiness.	Effectiveness of the Guidelines as a market facilitation measure in ensuring consumers receive care and respect in interactions with retailers and assess the extent to which denial of services via credit checks is an issue.

- 3.6. At present, these information gaps hinder our ability to accurately monitor the retail market and its outcomes. They also limit our ability to:
- a) make better evidence-based policy decisions based on improved data, in areas relevant to the retail market,
 - b) include trackable and meaningful outcome measures linked to our additional objective in our Statement of Intent, and
 - c) meet certain measures in our Statement of Performance Expectations such as regularly publishing robust monitoring reports.

Stakeholders have shared concerns about the Authority's current approach to retail market monitoring

- 3.7. Our current approach to retail market monitoring has caused concern amongst industry stakeholders, including retail participants and consumer advocacy groups across four key areas outlined below: lack of socio-economic analysis, overlapping questions and interpretation issues, lack of visibility of information collected, and absence of sufficient residential consumer hardship information.

Inability to link retail data to socio-economic data

- 3.8. A lack of ICP level pricing information in our current retail market data collection activities makes it difficult to identify the effects of price on consumers from different socio-economic backgrounds or those identified as vulnerable or at risk of energy hardship.
- 3.9. We can access Statistics New Zealand (Stats NZ) Census data through Stats NZ's creative commons license.¹⁵ This includes information on employment, housing quality, education, income, household characteristics, disability information, and telecommunication access for 29,910 areas named 'Statistical Area 1' (SA1) across New Zealand. Each SA1 usually contains 100 – 200 residents.¹⁶
- 3.10. Data points can also be linked to the smallest geographic unit of 'meshblocks', which can vary in size from part of a city block to a large area of rural land, but optimally contain approximately 60–120 residents. As of 1 January 2023, there were 57,539 'meshblocks' in New Zealand.¹⁷
- 3.11. The expanded data collection proposed in this paper includes ICP level information. This could be aggregated and connected with aggregated Stats NZ data, such as the income levels of consumers. This would allow us to monitor how retail market competition relates to different socioeconomic outcomes. We would be unable to associate census data with a single ICP but would be able to associate census data with a group of geographically clustered ICPs by matching an ICP to a 'meshblock'.

Overlapping questions and interpretation issues

- 3.12. In late 2022, the Electricity Retailers Association of New Zealand (ERANZ) raised concerns that multiple retail market data requests were coming from the Authority to retailers with overlapping questions. We found that these concerns were justified with questions in the RFS notice and Consumer Care Quarterly Monitoring data overlapping in key information areas such as disconnections and referrals to Work and Income. These concerns were limited to the data identified as 'retailer and consumer financial stress data' and did not relate to the data identified as 'registry and consumption data' or 'socio-economic data' in Sections 2 and 3 of this paper.
- 3.13. We have not actively requested the quarterly monitoring information required under Part 10 of the Consumer Care Guidelines, since late 2022, and have not undertaken the annual voluntary interest area request for information for the 2021 and 2022 financial years to limit areas of overlap in response to this feedback.
- 3.14. ERANZ members also shared concerns that the current RFS notice contains potential for misinterpretation, which may skew the data collected. For example, the notice does not define key terms such as what a "vulnerable" consumer is.

¹⁵ <https://www.stats.govt.nz/about-us/copyright/>

¹⁶ For more information on Statistics New Zealand's Statistical Area 1 see: <https://datafinder.stats.govt.nz/layer/105162-statistical-area-1-2021-generalised/>

¹⁷ For more information on Statistics New Zealand's meshblocks see: <https://datafinder.stats.govt.nz/layer/111228-meshblock-2023-generalised/>.

Publishing of requested information

- 3.15. ERANZ members, consumer advocacy groups (consumer stakeholders), and the Energy Hardship Expert Panel (the Expert Panel) have raised concerns that the RFS and other retail market data is not published. Although we are not required to publish data we collect, stakeholders have noted the RFS notice consultation paper indicated an intention to publish aggregated RFS notice data on our website. We have not done this because of the potential for published data to be misinterpreted due to the numerous caveats associated with it.
- 3.16. In the view of some stakeholders, the current lack of publicly accessible retail market data is a failure to supply transparent information to retail market participants and stakeholders on the overall outcomes of the market.

Collection of domestic consumer hardship information

- 3.17. Consumer stakeholders and the Expert Panel have also expressed concern that we do not collect key energy hardship indicators¹⁸ such as the number of households with prepay meters, the frequency and duration of disconnections and reconnections, and number of refusals of supply to households following credit checks. In the Expert Panel's view, reliable and regular reporting of such information would enable better-informed decision making and improved targeting of energy hardship initiatives.
- 3.18. Additionally, we currently have no mandatory data gathering requests that are satisfactorily able to connect retail tariffs to consumption data for mass market and account managed small business customers. The option of only requesting tariff or consumption data and then linking this to existing datasets, EIEP1,3,13, and 14, was explored.¹⁹ However, significant issues with the existing data collected prevent the viability of this option, including:
- a) the half hourly consumption data currently held at an ICP level is only for large commercial consumers and not residential consumers
 - b) retail tariff data is only being gathered on a voluntary basis
 - c) most consumption data is normalised volumes over a month rather than by billing period, making it hard to link to pricing data at a customer level
 - d) of the datasets with mass market ICP level consumption data, we have been unable to reliably join retail tariffs. Irregular data quality means consumption is unable to be linked to its applicable retail tariff at an ICP level approximately 20% of the time.

¹⁸ The Panel has outlined key energy hardship indicators within Strategy CP3 of their discussion document "Te Kore, Te Pō, Te Ao Marama. Energy Hardship: The challenges and a way forward" available here: <https://www.mbie.govt.nz/assets/energy-hardship-the-challenges-and-a-way-forward-energy-hardship-expert-panel-discussion-paper.pdf>.

¹⁹ For information on these EIEP's see our electricity [information exchange protocol information page](#) on the Authority's website.

Q1 What are your views on the Authority's description of the current issues with its monitoring of the retail market? Are there any additional issues we have not included?

4. Desired state

The Authority believes retail market monitoring should primarily be through one mandatory request collected on a consistent basis

4.1. Any improvements to our retail market monitoring should address the concerns of stakeholders and fill identified information gaps, while ensuring any costs from data requests are reasonable. We believe any option to improve retail market monitoring should therefore be assessed against the following factors.

Fill identified information gaps (Comprehensive)

4.2. Any new data requested should fill the identified information gaps from Table one, enabling us to monitor aspects of retail market competition, reliability, and efficiency, and domestic and small business consumer outcomes. The request should also be flexible enough to accommodate our changing needs with the option of adding, removing, or adjusting sections (subject to clause 2.24 of the Code) over time as the market changes. This data should be able to be linked to Stats NZ Census data to improve our understanding of the relationship between these objectives and wider socio-economic factors.

Deliver information covering all necessary ICPs (Mandatory)

4.3. Any new data request should cover mass market and account managed small business customers from all retailers. The request should be mandatory to ensure all required data is supplied. This would help ensure our ability to monitor retailer interactions with customers across the entire market, including smaller retailers and new market entrants, whose activities have been outside of the scope of previous market monitoring requests.

Consolidate current retail data requests (Consolidated)

4.4. Improvements should remove any potential overlaps between existing active and inactive regular data requests made to retailers. Therefore, any new request should consolidate and replace the RFS notice, some of the voluntary monitoring requests from Part 10 of the Consumer Care Guidelines, and annual requests, as well as avoid requesting data already received via the Registry and through EIEPs as much as possible.

4.5. This is not inclusive of irregular or one-off requests which may occur for reasons such as in reaction to an event or for a onetime study.

Be available for publication (Transparent)

4.6. The mechanism in which data is collected should allow for meaningful insights to be drawn and published. Insights and/or aggregated summaries of the data collected

should be available in our regular publications and on our website to relieve stakeholder concerns and help us grow the trust and confidence of the retail sector.

Minimise costs on participants and the Authority (Cost-effective)

- 4.7. We recognise that implementing a new data mechanism may involve additional costs for both participants (and potentially to consumers through passed on costs) and the Electricity Authority, such as the cost of implementing new systems or processes and providing the required data on an ongoing basis. We acknowledge these costs may have a greater impact on some participants, particularly smaller retailers, and these impacts may be passed on to electricity consumers through higher prices.
- 4.8. Therefore, any improvement to retail market monitoring should be designed in a way to ensure that any costs imposed are minimised where reasonably possible. This means that the costs should be considered during the design process to reduce any burden on participants or consumers.

5. Clause 2.16 notice

The Authority believes a new ongoing clause 2.16 information notice is the best method to improve our retail monitoring

- 5.1. Considering the objectives outlined above, we believe publishing a new clause 2.16 notice is the best method to ensure meaningful retail market data is collected on a consistent and mandatory basis in a way that would allow us to better deliver our statutory functions regarding monitoring.
- 5.2. Clause 2.16 allows us to publish a notice specifying information that a participant must provide to us either on a regular basis or as a result of an identified event. Information may only be collected under clause 2.16 to carry out one or more of our monitoring functions to:
 - a) monitor compliance with the Act, the regulations, and the Code
 - b) undertake and monitor the operation and effectiveness of market-facilitation measures
 - c) undertake industry and market monitoring, and carry out and make publicly available reviews, studies, and inquiries into any matter relating to the electricity industry.
- 5.3. We consider that collection of retail market data comes under these monitoring functions and is discussed further in Table four (after paragraph 6.4.).

Assessment of new notice against factors

- 5.4. Table two below outlines how the proposed clause 2.16 notice would meet our retail market monitoring needs across the factors.

Table Two: Clause 2.16 notice alignment with factors

Objective	How a clause 2.16 notice meets the factors
Comprehensive	Information can be collected across desired monitoring areas for the purpose of carrying out one or more of our monitoring functions. Notice applies to mass market and account managed small business customers, with specific questions on domestic and small business outcomes.
Mandatory	Requires participants in the notice to provide the requested information.
Consolidated	Allows for the consolidation of overlapping questions and/or disestablishment of some current collection methods including RFS and voluntary requests.
Transparent	Information collected through the notice and insights can be published regularly, and used to create reviews and studies, and to respond to inquiries. Participants providing information can identify information they consider to be confidential.
Cost-effective	The notice requires data is provided in a standardised format through the Authority's information management system, reducing costs for participants and the Authority.

- 5.5. If a new clause 2.16 notice is approved, we intend to cancel the RFS notice and stop the quarterly voluntary requests under the Consumer Care Guidelines, and annual voluntary interest area requests for retail market data (where interest areas overlap with what the proposed notice collects).
- 5.6. We will continue to collect Registry and EIEP1 data for monitoring of some aspects of the retail market including consumer switching, retailer market share, and installed distributed generation. We will also continue collecting retailers' customer care policies and annual alignment statements under Part 10 of the Consumer Care Guidelines. This data is complementary to the data proposed to be collected in this paper.
- 5.7. Note we may request information that would be gathered under the proposed notice through other mechanisms before the notice is fully implemented if this information is needed urgently. We will ensure these requests do not overlap with questions in current data collection mechanisms.

Alternative options to collect information do not meet the Authority's needs or have higher potential costs

- 5.8. We have considered the following three alternative options to a new clause 2.16 notice, but our preliminary view is they did not meet the desired objectives in certain areas. We welcome your views on this.

Section 46 request

- 5.9. Section 46 of the Act allows us to require any information from a participant for the purposes of carrying out our monitoring function, and this information can be requested on a one off or ongoing basis.
- 5.10. We consider that a section 46 request for retail data could meet the desired objectives in the same way as a clause 2.16 request. However, using section 46 instead of clause 2.16 for this information request is less appropriate given the amount of information involved, the intention to make this a recurring request and that numerous section 46 may incur higher one-off and ongoing transaction costs to the Authority and participants.²⁰
- 5.11. Additionally, clause 2.16 provides greater transparency, certainty, and clarity to participants through requirements not contained in section 46. When issuing a clause 2.16 notice, we are required by clauses 2.17 and 2.18 to specify an information request's purpose, cost and benefits, and impact on participants, alongside a requirement to consult with impacted participants.

New or amended voluntary request

- 5.12. A new or amended voluntary retail market data request could meet some of the intended objectives by consolidating questions, being publishable, and covering all necessary data collection areas.
- 5.13. The request would not be mandatory and would fail to provide sufficient certainty that the information received covers mass market and account managed small business customers potentially creating a less meaningful dataset.²¹ We could also face high transactions costs associated with following up on voluntary requests.

Amend current RFS notice

- 5.14. The Authority is currently collecting retail market monitoring data under the clause 2.16 RFS notice. Our proposed notice is seeking to collect new data and ask questions in different areas to those covered within the existing RFS notice. Amending the RFS notice would accordingly require substantive changes to its content. To make these changes under the Code, the Authority is required to consult with those participants to whom the RFS notice applies.²² Since establishing a new clause 2.16 notice also requires consultation with affected parties, we therefore believe that creating a new notice, rather than amending the current RFS notice, is the best and most efficient course of action.
- 5.15. We also consider that amending the current RFS notice instead of creating a new notice would be unnecessarily confusing to participants given that the information

²⁰ See Appendix B "analysis of costs and benefits" section in "improving the framework for the Authority's information gathering" decision paper available at <https://www.ea.govt.nz/documents/1486/Decision-paper-Improving-the-framework-for-the-Authoritys-information-gathering-v2.pdf>

²¹ Based on historical response rates to voluntary requests being less than 100%

²² Under clause 2.24 of the Code, consultation is required to amend a 2.16 notice unless the changes are technical, non-controversial, have widespread support amongst the participants to whom the notice applies, or if there has already been adequate prior consultation.

collected, and the purpose of collection, would be significantly different to the current notice.

- 5.16. We acknowledge that the current RFS notice has only been in place since 1 October 2022, and that ideally, we would have addressed the issues identified in this paper at that time. The comprehensive approach taken to the current proposal means it should be much more durable than the current RFS notice.

Q2 The Authority is proposing that retail market monitoring should be through one consolidated, mandatory request, collected on a consistent basis, that is proactively published, cost-effective, and fills identified information gaps. What are your thoughts on this proposal?

6. Proposed Notice Consultation

The Authority has developed a draft clause 2.16 notice for your feedback

- 6.1. The Authority has developed a draft clause 2.16 notice for your feedback which is attached as Appendix A.
- 6.2. The notice would apply to retailers' mass market and account managed small business customers which are currently the main focus of the Authority's retail monitoring work. This scope may be subject to change as the Authority completes other work programmes, and this will be consulted on as needed.
- 6.3. The draft notice requires retailers to deliver the requested information monthly through a set of data tables and series of questions. The ICP level information requested is by billing period (rather than by calendar month) to better align with retailers' systems and reduce compliance costs. The contents of the draft notice is summarised below:

Table three: Proposed notice content summary

Data Collection Table in Notice	Summary of collection
Table 1	Proposes collecting information at an ICP and customer level regarding a customer's contract details including bundled utility services, discounts, fees, prepay. Customer circumstances (medically dependent consumers, small business/residential). Generic information related to billing such as plan names, retailer brand and billing period.
Table 2	Proposes collecting information at an ICP and customer level regarding a customer's usage rates and electricity consumption.
Table 3	Proposes collecting information at an ICP and customer level for customers disconnected for non-payment regarding their disconnections, reconnections, method of disconnection and reconnection, arrear levels, and associated fees.

Table 4	Proposes collecting information at an ICP and customer level regarding debt management actions or actions taken to minimise payment difficulties.
Table 5	Proposes collecting information about retailers' basic plans and whether the plans' details are on Powerswitch.
Separate questions	Proposes collecting information regarding usage of load control/flexibility service for all customers, and customer complaints, proactive support for customers in payment difficulty, and refusal of service for domestic and small business consumers, with information related to medically dependent consumers collected separately.

- 6.4. Before publishing a clause 2.16 notice, we must meet certain requirements in the Code (contained in clauses 2.17 to 2.19 of the Code) including:
- a) Providing to participants who are required to give information under the proposed notice:
 - the proposed notice
 - our purpose in setting the information requirements in the proposed notice
 - our assessment of the likely benefits of obtaining the information required in the proposed notice and whether those benefits are expected to outweigh the likely costs.
 - b) Giving participants to whom the notice applies a reasonable opportunity to make submissions to us on the proposed notice, and for us to take into account those submission in deciding whether to make changes to and/or publish the notice.
 - c) Being satisfied that the benefits of us obtaining the information outweigh the costs of the information requirements set out in the proposed notice, and that the information requirements set out in the proposed notice promote our objectives in section 15 of the Act.
 - d) Considering the impact of the proposed information requirements on each participant to whom it is proposed the notice apply.

6.5. How the above requirements have been met are detailed in Table four below.

Table four: Summary of how the proposed notice meets Code obligations

Code clause and requirement	Information
2.16(2) – The Authority may specify information in a notice only to carry out the Authority's	We consider the proposed information request primarily falls under two aspects of our monitoring functions: <ol style="list-style-type: none"> 1. Undertaking industry and market monitoring under s16(1)(g); and 2. Undertaking and monitoring the operation and effectiveness of market-facilitation measures under s16(1)(f).

<p>monitoring functions.</p>	<p>All information collected under the notice would be used for general electricity industry and market monitoring as it is information about the electricity retail market, and the outcomes this market delivers for participants and consumers.</p> <p>Certain information requirements in the notice would be used to monitor the operation and effectiveness of the Guidelines, which are a market-facilitation measure. Information regarding disconnections, arrears, complaints, debt management actions, and fees are collected partially to monitor the intended outcomes of the Guidelines and the operation of certain parts of them.</p>
<p>2.18(1)(a) – proposed notice</p>	<p>The proposed notice is attached as Appendix A.</p>
<p>2.18(1)(b) – Authority’s purpose in setting the information requirements in the proposed notice</p>	<p>As set out above, our purposes in setting the information requirements in the proposed notice are to undertake industry and market monitoring under s16(1)(g) and to undertake and monitor the operation and effectiveness of market-facilitation measures under s16(1)(f). In doing so, our aim is to promote our statutory objectives by monitoring competition, reliability, and efficiency, and outcomes for domestic and small business consumers in the retail market, and the operation and effectiveness of the Guidelines.</p>
<p>2.18(1)(c), 2.19(1)(a) – assessment of likely benefits of the Authority obtaining information and whether those benefits outweigh the likely costs</p>	<p>In issuing the proposed clause 2.16 notice, we would be aiming to make it easier for industry participants to provide ongoing information to us and for us to engage with participants over requirements for the ongoing provision of information. Consistent with these aspects, participants are expected to benefit from:</p> <ul style="list-style-type: none"> • an improved ability to contribute to determinations of our information requirements and what information should be collected on an ongoing basis • an improvement in the quality and design of information requests, which amongst other things, would make them easier for participants to interpret and respond to • a more standardised approach to information provision obligations, thereby enhancing regulatory certainty • improved transparency and clarity around information provision obligations • reduced transaction costs associated with the mandatory provision of information. <p>Once retailers finish putting their appropriate data gathering processes in place, we expect the administrative burden of providing the data under the proposed notice to be minimally higher than the data requirements already in place for the various requests around retail data we already have.</p> <p>We expect a much greater return on cost in the form of greater breadth and depth of reporting of important metrics in the retail space for the Authority and consumers than previous requests.</p> <p>With the creation of a single consolidated ongoing notice we would be able to remove the obligation to respond to the active RFS and quarterly data requests.</p>

	<p>The proposed request is also expected to streamline future data requests and reduce the number of future one off data requests.</p> <p>We believe the benefits of this proposal outweigh the likely costs.</p>
<p>2.19(1)(b) – information requirements set out in proposed notice promote the Authority’s objectives in section 15 of the Act</p>	<p>Information collected under the draft notice is being collected in order to promote our main statutory objective to promote competition in, reliable supply by, and the efficient operation of the electricity industry for the long-term benefit of consumers, and also to promote the additional objective of protecting the interests of domestic consumers and small business consumers in relation to the supply of electricity to those consumers.</p> <p>Information on fees, discounts, rates, and plans by retailer can be used to monitor the range of contract conditions across the retail market and thus monitor market competition. Monitoring trends around the uptake of different pricing plans can be used to identify whether retailers are competing by innovating around the products they are offering to the retail market. Monitoring switching trends and consumption data alongside fees, discounts and rates will provide further insight into how consumers are responding to price incentives and market competition.</p> <p>Information on the bundling of other services with electricity will be able to increase the understanding of how bundled plans may affect consumer price incentives around electricity and the impact bundling can have on electricity retail market competition.</p> <p>Consumption data, when combined with disconnection data, can be used to keep track of outages which can be a key metric for system reliability. Tracking the use of distributed energy resources and their interaction with the local distribution network would increase understanding of how these mechanisms can support the nation’s transition to a fully renewable power system.</p> <p>Consumption and pricing data can be used for identifying the penetration of TOU pricing plans, specifically time conditional plans (TCPs), on peak electricity demand. This is a retail product the Authority has identified could be a cost-effective method to ensuring grid security during a time of limited generation capacity and higher generation intermittency, which would improve system resilience and efficiency.</p> <p>Information collected regarding small business and domestic consumers within the notice would support and advance our additional objective. Some of the information proposed to be collected is about how a retailer deals directly with these consumers (such as debt management actions, complaints), or consumer outcomes that result from retailer action (such as time disconnected, and disconnection practices, including method of disconnection and reconnection). Monitoring of this information would allow us to understand how the retail market is delivering outcomes for these consumers, supporting any future analysis we may conduct around protecting consumers’ interests under the additional objective.</p>

6.6. The Authority is only required to consult with and take into account the views of participants to whom the notice applies under clause 2.18 of the Code. However, we consider that public consultation is appropriate in this case given the information

collected would be of interest to other stakeholders. This might include domestic and small business consumers, consumer advocacy groups, academics, NGOs, Office of the Privacy Commissioner and government agencies.

- 6.7. The following sections of this paper adds some additional detail and context to the points made above in Section 5.

Q3 What are your views on the Authority's proposal that a new Clause 2.16 notice is the correct tool to improve retail market monitoring?

Expected data structure and formatting for submission

- 6.8. Rather than asking questions of retailers, as was done in previous data requests like the RFS, we propose to request the raw data that underlies the responses to these questions. The tables within the request are structured similarly to how they would be structured in a relational database.²³ Columns such as 'Customer identifier' and 'ICP' would act as foreign keys to join the separate tables. This formatting approach would improve data quality in the following ways:
- a) The proposed single column approach can be used to answer multiple questions. This would ensure the most efficient use of data, the type of information asked for is minimal and that we would have the flexibility to assess the information at different levels of detail.
 - b) The proposal to connect raw data from columns across the different tables, would allow us to ask multiple different questions of the data while minimising the burden on retailers.
 - c) Collecting only raw data would reduce the possibility of retailers misinterpreting complex questions, creating errors in analysis. This proposed change will ensure consistency in how answers are constructed.
 - d) This proposed approach would make the request relatively easy to modify (subject to the processes in clause 2.24) and accommodate potential future information gathering projects, reducing the effort required from the Authority and participants when designing and responding to future requests.
- 6.9. We anticipate that the data within the proposed request mostly reflects data retailers hold within their billing systems and use to invoice their customers. The tabular data is intended to encapsulate the data held within retailers' billing systems. This includes line items that a customer would expect to see on their electricity bill and customer debt management information. The request for monthly table data is for monthly billing data in which the consumers usage for that billing period ends in the month requested.
- 6.10. For example, if the request is for April data, the data submitted should be for the consumption period that is invoiced in April (this assumes the bill is issued as soon

²³ In this case a relational database is a system that organises data into interconnected tables with a goal of ensuring accurate, consistent, and easily retrievable information.

as the consumption period ends). We believe following retailers' natural billing cycles is the most efficient way for retailers to provide data.

- 6.11. Retailers will ideally already have the necessary systems in place to be able to easily retrieve most of the data being proposed in the request. The proposed notice includes accommodations to request data by billing cycles rather than by month to reduce the amount of work retailers would need do to prepare the data.
- 6.12. We intend to have a two-month implementation period if the new notice is published to acknowledge that retailers may need to update internal data management systems. Retailers would not be expected to provide data during this period, and Authority staff will be available to assist retailers on any points of confusion when updating their systems.
- 6.13. This data format is intended to form the foundation for any future data requests. The goal is that should we find we need additional retail data, further consultations will be to expand on the proposed notice, building or adding to existing tables rather than to create an additional separate data request.

Data is to be submitted through the Authority's Information Provision platform

- 6.14. Information is proposed to be submitted through our Information Provision platform. The Information Provision platform is our bespoke online portal for handling regular responses to data requests. Responses to the current RFS notice are submitted through the Information Provision platform.
- 6.15. An API would be an alternative to using the Information Provision. Alternatively, as we use DeltaLake for data storage it would be possible for participants to share data through DeltaLake's data sharing service, Delta Sharing. In your submission, please indicate whether you would prefer to make use of APIs to submit the data or if would you be interested in using Delta Sharing from either a Databricks platform or some other compliant data platform.

Q4 What are your views on the ICPs the proposed notice applies to, and do you believe the proposed notice should apply to any other group of ICPs?

Q5 (For retailers) What is your definition of mass market? Will the request for account managed small businesses capture all the small businesses that fall outside your definition of mass market?

Q6 (For retailers) What method would you prefer to use to submit your data?

Retailers are not expected to submit data for services they do not provide

- 6.16. The proposed notice is designed to encompass data relating to all possible services a retailer may provide to consumers. Some of the data requested in the proposed notice may not be relevant to all retailers, such as those who do not offer TOU plans and bundling of non-electricity services. Retailers are not obliged to provide information for services they do not provide.
- 6.17. If we did proceed with issuing the notice, we note that retailers would need to set their response as 'N/A' when they are unable to provide a piece of data because the

structure of our Information Provision platform does not allow 'NA', 'null' or 'none' responses for non-character columns. If we detected an unusually high number of 'N/A' responses having issued the notice, we may then contact the relevant participant to understand the reason why.

Historical data is being requested to establish trends and set a baseline

- 6.18. We are proposing to request data dating back to 1 January 2018 from electricity retailers as part of the initial submission process. This data would enable us to achieve several important aims:
- a) Align data with the 2018 Census: Connecting retail and consumption data to census data by matching ICP to 'meshblock' would allow us to better understand the relationship between socio-economic outcomes and the electricity retail market. By aligning the data with the Census, we can analyse the impact of factors such as household size and age on total electricity usage and electricity usage patterns, which would help to monitor competition across different demographics and help us identify the ways in which small consumers' interests in electricity supply may need protecting.
 - b) Establish a baseline level of data unaffected by Covid-19: The Covid-19 pandemic may have had a significant impact on electricity consumer outcomes. By requesting data from 2018, we can establish a baseline level of data that has not been affected by the pandemic. This would provide a more accurate and reliable reference point for assessing any changes or trends in the market.
 - c) Identify any trends easily without waiting for data to build up over time: The collection of historical data dating back to 2018 would enable us to identify any trends or patterns that may have developed over time, without having to wait for new data to accumulate. This would allow for more timely and effective monitoring of the market and better place us to respond quickly to any emerging issues or concerns.
- 6.19. We understand that some retailers may not be able to provide data from 2018 for reasons such as no longer holding customer data for privacy reasons. As part of this consultation, we want to understand the extent to which retailers would be able to provide information back to 2018.
- 6.20. We are aware that consumption and account data can be revised after a customer is billed for a variety of reasons. Retailers will be unable to change any data submitted to us through the Information Provision platform after the submission deadline has passed. Therefore, we accept there may be a certain amount of erroneous information within the received datasets.
- 6.21. If any data is revised, we ask that retailers resubmit the data for the billing months where the data is revised. We believe the impact of receiving data that may later be revised should be relatively minimal as we expect erroneous data to only form a small percentage of the total data it receives.
- 6.22. We also expect most corrections a customer's account receives will flow through into their next bill and so most corrections should appear within submitted data for the following month.

Data would be used to monitor the effectiveness of the Authority's Consumer Care Guidelines

- 6.23. Monitoring the operation and effectiveness of consumer care measures is a key purpose for collecting information about domestic consumers across multiple areas.
- 6.24. The Guidelines have a range of broad intended outcomes that would be monitored through the information requested in the proposed notice, and we expect, in the event that the Authority's recent consultation results in parts of the Guidelines being made mandatory, the proposed notice would be sufficient to monitor the effectiveness of these too. Some key outcomes which the information proposed for collection would assess include:
- a) Retailers work proactively to minimise harm caused by difficulty accessing electricity, seek to keep customers connected, and support customers facing payment difficulties. This links to information requested for debt management, arrears, disconnection, retailer support programmes, and customers refused supply because of a failed credit check.
 - b) Medically dependent consumers are not to be disconnected for non-payment of debt or for obtaining electricity or distribution service by or involving deception. This links to information requested for disconnection, and a medically dependent consumer's customer flag.
 - c) Customers are treated with respect and receive a minimum standard of treatment regardless of whether they are a customer of the retailer. This links to information requested on complaints.
 - d) Retailers are paid for electricity supplied. This links to information requested for arrears and write-offs.
- 6.25. The Guidelines also have multiple parts with recommended actions that require monitoring to understand how they are being applied across the retail market. For example, the Authority needs information on fees and discounts, to monitor Part 9 of the Guidelines, which makes recommendations regarding the fairness of fees, bonds, and discounts. The existing quarterly monitoring information so far has been limited in its capacity to fully monitor how the Guidelines are being applied, focusing on market share and switching statistics instead.

Monitoring the retail market to inform and advance measures for the consumer protection function

- 6.26. Information requested in the proposed notice from retailers about domestic consumers and small business consumers within the retail market also falls under the industry and market monitoring function in section 16(1)(g) of the Act.
- 6.27. Monitoring this information would allow us to understand how the retail market is delivering outcomes for these consumers and provide insights into the effectiveness of the regulatory framework and policies in place, in line with our additional objective.
- 6.28. By monitoring these outcomes, we may also identify further issues or areas of concern in regard to small consumers, beyond those covered by the Guidelines that

could subsequently be used to inform policy and regulatory changes and other market facilitation measures.

- 6.29. Examples of analysis that would be performed to monitor these outcomes include:
- a) measuring time between disconnection and reconnections
 - b) linking disconnections to levels of debt and whether consumers were on prepay plans
 - c) measuring the percentage of prompt payment discounts and late payment penalty remaining across plans
 - d) monitoring arrear levels against debt management actions to see how effective debt management actions are
 - e) measuring the ratio of consumers on standard user plans to low user plans.

Monitoring the retail market for the main statutory objective

- 6.30. Parts of the proposed information request may also support and advance elements of the Authority's main objective to promote competition in, reliable supply by, and the efficient operation of, the electricity industry for the long-term benefit of consumers.
- 6.31. Outlined below are examples of what we seek to monitor using the information within the proposed notice.

Distributed Energy Resources (DER)

- 6.32. Within the proposed notice for each consumer that is in a contract to export electricity, we are requesting the price paid for exported electricity (\$/kWh) and the amount exported (kWh) at an ICP level. Collection of this information falls under the industry and market monitoring function in section 16(1)(g) of the Act, as the information would be used to monitor the usage of distributed energy resources (DER) such as solar panels within the retail market. Monitoring this information would inform our decision making in the future regarding usage of DER.
- 6.33. As noted in our 'Updating the regulatory settings for distribution networks'²⁴ decision paper, we intend to support innovation, promote competition and consumer choice in contestable markets that may arise as a result of DER development, and maintain reliability and security of supply which DER development can contribute to. Monitoring information regarding use of DER will enable these intentions and may inform future regulatory and policy decisions in this area.

Plan comparison and switching

- 6.34. Information related to price or customer plans can provide insight into the level of competition and innovation in the retail market, by giving us more clarity into how pricing and plans change between retailers for different geographic, customer

²⁴ The Decision paper and information about this project are available here:
<https://www.ea.govt.nz/projects/all/updating-regulatory-settings-for-distribution-networks/>

segment, and socioeconomic factors. This would mean that we can better understand competition and market outcomes across these various segments.

- 6.35. Comparing pricing and plan data against wholesale and spot market data across retailers would enable us to better monitor retailers' retail margins and how and whether retailers are competing for different customer segments eg, new customers gained with the previous two years. This would be for the purposes of monitoring competition.
- 6.36. In addition to our market monitoring function, we note that we are also required under section 16(1)(i) to promote the benefits of comparing and switching retailers. We would be able to link retail prices with location and aggregated socioeconomic variables eg, income, education levels, housing quality. As a result, we would be able to identify 'sticky' customers and compare their plans with consumers who switch electricity providers frequently. This allows us to measure the level of consumer engagement and what measures would best promote switching across different demographics.
- 6.37. Combining retail plan information and its availability on the Powerswitch website with switching statistics already being collected would allow us to monitor how retail plans are being represented to consumers on plan comparison services; how this influences consumer plan switching; and how retailers are responding to competitive plan pricing in the retail market.

Bundling of electricity with other services

- 6.38. We are proposing to request data related to bundling electricity with other services, and the discounts associated with bundling. This is to analyse whether bundling delivers a net benefit through price rather than convenience compared to separately priced plans and considering whether consumers understand the true costs of the services. Understanding whether bundling delivers a net benefit and how this is communicated would help assess whether electricity consumers need protecting in their dealings with retailers and can provide insight as to whether potential misunderstandings around bundling benefits have an influence on electricity retail competition.
- 6.39. Examining how long ICPs have been on a bundled plan compared to similar geographically located ICPs with similar consumption profiles may also increase understanding as to whether bundled plans increase a customer's 'stickiness' thus providing further insight into the effect bundling has on electricity retail competition.

Demand response (DR) and load control

- 6.40. We are requesting price and consumption data as part of the proposed notice to understand price driven demand response. Analysing consumption by tariff and whether the load is controllable allows for analysis of price responsive trends, which would feed into work around the reliability and efficiency of electricity supply.
- 6.41. Retail tariff and consumption data is linked together within the proposed notice. Table 2 of Appendix A asks for tariff(s) and the total consumption associated with the tariff(s) for the billing period. If half hourly consumption is applicable the table

also asks for half hourly consumption associated with that tariff for each half hour within the billing period.

- 6.42. This allows us to understand the relationship between consumption and price and provides context to pricing for monitoring of retail competition. Having half hourly consumption data linked to prices allows us to identify any price sensitive demand shifting behaviour, which would assist in understanding the effectiveness of using demand side firming.

Time of Use (TOU) plan uptake

- 6.43. One of the primary questions we will be looking to answer is how effective niche TOU tariffs are for shifting load. There are also supplementary questions to understand niche TOU plans such how many customers are on EV specific tariffs, what their pattern of consumption is, and if known, the method of EV charging used (eg, smart chargers).
- 6.44. Demand shifting behaviour is closely linked to emerging retail market trends. Previously TCP plans were only available to commercial consumers. However, the advent of new and emerging technologies – primarily smart meters – has encouraged some retailers to make TCP plans available to residential and small business consumers.
- 6.45. Several factors are expected to increase the uptake of TOU, specifically TCP, pricing plans:
- a) Greater uptake of, and utilisation of, smart meter data.
 - b) Increased uptake of EVs – new EV owners are often motivated to switch to plans which enable cheaper overnight EV charging.
 - c) Technology which will enable some devices – such as residential EV chargers – to be managed remotely (flexibility services).
 - d) The introduction of real time pricing to the wholesale market by Transpower and the Authority. Real time pricing delivers more accurate and certain wholesale electricity prices to help market participants make efficient real-time decisions about their consumption and generation. One of the intended outcomes of this switch was to encourage demand response products for shifting peak load.
- 6.46. Increasing the use of TCPs by domestic and small business consumers can help flatten peak electricity demand and support system security and resilience. We have identified both as key enablers for the cost-efficient expansion of renewable generating capacity. Our ability to monitor this important emerging trend is a key reason for using half hourly consumption data, where available.

Information may be used for market facilitation purposes and can also be used to appoint an investigator

- 6.47. The information requested in the draft notice is not specified for the purpose of investigating or enforcing compliance with the Act, the regulations, and the Code. However, we may use the information provided by the notice to make a decision to appoint an investigator under regulation 12 of the Electricity Industry (Enforcement) Regulations 2010, as allowed by clause 2.16(3) of the Code. Clause 2.23 ensures

that employees and participants that are individuals are provided protection against self-incrimination.

- 6.48. Information collected for the purpose of monitoring may also be used by the Authority for the purpose of undertaking market facilitation measures.²⁵

Benefits outweigh predicted costs

- 6.49. The benefits of being able to adequately monitor retail market outcomes, in particular price outcomes for consumers, are likely to be substantial. For instance, a small improvement in retail competition as a result of issues identified using this data is likely to have material benefits to consumers. What the full extent of the benefits could be, however, are difficult to quantify because what this data reveals and what actions might be taken as a result are not yet known.
- 6.50. The benefits of a greater understanding of the contribution of distributed energy resources to the reliability of the power system and of its potential to support a transition to a renewable power system is also difficult to quantify prior to analysing the data in the proposed notice.
- 6.51. We have accounted for the cost of Authority resources, and this is estimated to be relatively low. The largest and relatively unknown cost is the cost to retailers to provide this information. Our ability to quantify this cost is limited as there are a variety of retail systems currently in use by retailers so the cost to each retailer would be different.
- 6.52. The costs to retailers would be partially offset by eliminating the current retailer data requests. This offset is unlikely to be total as more information is being asked for in the proposed notice. However, as is the case for most data requests, once the initial set up cost has been incurred, the ongoing costs to retailers for maintenance and provision of the requested data should be relatively low. As noted earlier, we expect retailers to already hold the majority of the requested information within their billing systems, which should lower the cost of data processing.
- 6.53. This proposed data request would also make one-off data requests for the retail market less likely, such as the study of price changes in 2014. These sorts of data requests have a material cost on both retailers and the Authority due to their very specific nature.
- 6.54. Overall, we believe the benefits of this notice are likely to outweigh the costs.

Stakeholder feedback requested

- 6.55. We understand there will always be limitations to the accuracy and amount of information a retailer can provide due to the complicated nature of the retail market and the resources it takes to build and maintain high quality data collection and storage systems. As such, retailers should take this consultation as an opportunity to express any concerns they have about meeting the proposed notice requirements and any suggestions of alternative data they could provide that would meet the stated goals of the proposed notice.

²⁵ The Authority is currently reviewing and updating its *Guidelines for Use of Information Gathering Powers*.

- 6.56. Forums facilitated by Authority staff will be arranged for retailers that wish to clarify or discuss details of the proposed notice during the submission period.
- 6.57. We also welcome consumer feedback on the proposed notice, particularly regarding the scope of the data collected and how this would be used in monitoring the consumer outcomes outlined above in this paper. We intend on hosting sessions to engage with consumers on the consultation.

- Q7 Do you have any feedback on the proposed notice (Appendix A)?
- Q8 (For retailers) Would you be able to provide the information requested in the proposed notice backdated to 1 January 2018? If not, what is the earliest date from which you could provide the requested information?
- Q9 What are your views on how the information requested in the proposed notice would meet the Authority's statutory monitoring of competition, reliability, and efficiency in the retail market, and domestic and small business consumers' outcomes? What information do you think is needed to meet the Authority's statutory monitoring requirements?
- Q10 Do you believe the likely benefits of the Authority having this information would outweigh the likely costs? If not, why?
- Q11 (For retailers) Do you currently provide the Authority with any of the data requested in the proposed notice through any other mechanism that would not be replaced by a new notice (ie, not the RFS notice, or voluntary information provided annually and quarterly).
- Q12 (For retailers) What is the time and cost for you to put the processes in place to provide the data requested in the proposed notice initially and on an ongoing basis (noting the proposed two month implementation period)? What resources would this take? Please provide evidence to support any estimates where possible.
- Q13 (For retailers) Do you collect customer or ICP level information on EV chargers? If so, what are the details of this information eg, whether the charger is a smart charger?

We will consult on an updated assessment of likely benefits against likely costs after considering stakeholder feedback

- 6.58. We are seeking retailer feedback on the likely costs of providing the requested data in the proposed notice through this consultation process. This will help us quantify any unknown retailer impacts such as ongoing costs and one-off costs to set up the required systems to provide us with the information requested through the proposed notice.
- 6.59. After considering submissions on this consultation, if the project proceeds, we will consult on an updated assessment of likely benefits against likely costs and notice

for a shorter two-week period to ensure our evaluations of potential costs and benefits are well-informed and accurate.

We intend to publish the data received under this notice as part of our quarterly monitoring reports

- 6.60. We can use information gathered pursuant to Clause 2.16 to undertake industry and market monitoring and carry out and make publicly available reviews, studies, and inquiries into any matter relating to the electricity industry, under section 16(1)(g) of the Act.
- 6.61. As noted in Section 4 of this paper, stakeholders have expressed frustration with the Authority for not being transparent about what the data it collects is used for and for not making this data available to interested parties.
- 6.62. To remedy this, we intend to release some of the data collected under the proposed notice, and some of the analysis performed, through its market performance quarterly reviews and on our websites, primarily EMI. The reviews provide visibility of the regular monitoring undertaken by us, while EMI is our primary avenue for publishing data, market performance metrics, and analytical tools. The appropriate privacy considerations will be given to any information published, and any ICP level information will be suitably aggregated eg, by retail brand or geographic region before being published.
- 6.63. To improve transparency around our retail monitoring and increase the amount retail market data and analysis available to consumers, participants and interested parties, we initially intend to publish:
- a) Aggregate and retailer level data on disconnections for both postpay and prepay customers including average frequency of disconnection, time spent disconnected, method of disconnection and reconnection, and arrears level at disconnection (for postpay customers). Aggregate and retailer level data on customers on prepay, customer arrears, payments received from Work and Income on behalf of customer, complaints, and customers refused service due to creditworthiness.
 - b) Basic metrics on retail tariffs by plan types, retailer, region, and socio-economic markers. This is to monitor retail competition across the market and examine any significant price differences across groups.
- 6.64. Although we reserve the right to publish information received under the proposed notice (noting the content of the notice may change as a result of this consultation), we would like to hear stakeholder views on what information they believe should or shouldn't be published from the proposed notice, and why.
- 6.65. Information available from other organisations, such as complaints data held by Utilities Disputes Limited could also be used to supplement, and provide further context to, data and analysis we publish.
- 6.66. Participants to whom the proposed notice applies may identify any information for which confidentiality is sought, as required in clause 2.21 of the Code. If information is identified as confidential, we will then undertake the process for dealing with

information identified as confidential prior to any publication, as required under clause 2.22 of the Code.

- Q14 What are your views on the information the Authority intends to initially publish from the proposed notice, including the proposed level of detail? ?
- Q15 What information do you believe the Authority should or should not publish? What level of detail do you consider appropriate for publication, and why?
- Q15 (For retailers) What information requested through the proposed draft notice would you expect to mark as confidential under clause 2.21 of the Code?

We will ensure robust data security and privacy policies in place to address any Information Privacy Considerations

- 6.67. Some of the information we are requesting under the proposed new information request is at an ICP level (ie, household level), and it may be possible to link ICP level data to an identifiable individual or group of individuals. We will accordingly treat ICP level information received under this proposed request as personal information to ensure consumers are afforded the protections set out in the Privacy Act.
- 6.68. We are implementing enhancements to our policies and procedures to prepare for receipt of the retail information contemplated in this clause 2.16.
- 6.69. We intend to publish a full Privacy Impact Assessment alongside our secondary (analysis of likely benefits and costs) consultation and will cover the following areas:

Transparency (IPP3 and proposed new IPP3A)

- 6.70. We take transparency seriously. In Chapter Four of our *2022 Updating Regulatory Settings for Distribution Networks* consultation,²⁶ we discussed privacy matters, and sought feedback on ways the industry, particularly retailers, could improve their general compliance with the transparency requirements in information privacy principle 3 of the Privacy Act.
- 6.71. Prior to the 2023 general election, the Minister of Justice subsequently introduced the Privacy Amendment Bill into Parliament. The Bill proposed placing explicit disclosure obligations on agencies like the Authority, who are collecting information indirectly ie, from someone other than the individual concerned.²⁷
- 6.72. We recognise that we would be collecting a significant amount of personal information under the proposed clause 2.16 notice, some of it sensitive (eg, half-hourly consumption data, medically dependent consumer status and debt levels), and will be considering the implications of the Privacy Amendment Bill.

²⁶ <https://www.ea.govt.nz/projects/all/updates-regulatory-settings-for-distribution-networks/>

²⁷ A copy of the Privacy Amendment Bill can be found on the parliament website: <https://bills.parliament.nz/v/6/56e3fbe7-1f3d-464e-b54d-08dbae8917ae?Tab=history>

We note that Bills before Parliament lapse when the House dissolves prior to an election; however, they may be reinstated in the next session of Parliament.

- 6.73. If action is required by participants eg, enhancements to their privacy notices and/or terms and conditions, we will contact affected parties.

Information Security (IPP 5):

- 6.74. We are experienced at handling large and sensitive data sets within a modern, secure cloud-based platform. Over five years ago, we migrated our data processing and storage activities to a Databricks Delta Lakehouse (the Lakehouse) with the Microsoft Azure cloud platform. We currently hold about 77 billion records across 1,300 Delta tables, some of which hold confidential market data.
- 6.75. Any personal information collected through this proposed request will be stored in the Lakehouse and subject to access restrictions set by our Chief Information Security Officer (CISO). Sensitive personal information will have additional layers of security to ensure that access is strictly proscribed. Where practicable, Authority staff using any of the proposed data from the Lakehouse will be provided with transformed, aggregated, or anonymised data to remove private attributes.
- 6.76. We are reviewing our current IT architecture and cyber security systems to assess whether any adjustments to current practices are required. We have recently increased our resourcing in this area through establishing a Senior Advisor – Information Security role to assist the CISO in further strengthening our information security.

Retention (IPP9):

- 6.77. The data being collected under this proposed request is primarily for the purpose of data analytics. Trends and shifts in behaviour over time would only be detected when there are multiple years of data to analyse. Accordingly, we propose retaining some of the raw data for up to 10 years to ensure we can effectively carry out our monitoring functions and support a smooth transition to a low carbon, efficient, dynamic, and secure electricity system, while at the same time ensuring that consumers interests are at the forefront of our decision making processes.
- 6.78. To mitigate against any risks associated with a long retention period, we would delete underlying ICP level data where simplified aggregated versions of data will be sufficient and will use pseudonymisation techniques wherever possible.

Use (IPP10):

- 6.79. We would only collect the proposed information for the purposes authorised by clause 2.16(2) as outlined in this paper. As set out above, staff access to the collected information is controlled by the CISO. We will ensure robust procedures are in place so that any application to use the data received under the proposed notice is carefully considered by the CISO and adequately documented. Staff access to ICP level data would be limited on a strictly 'need to know' basis.
- 6.80. Information cannot be collected for the purpose of investigation or enforcement but can subsequently be used by our compliance function when deciding whether to appoint an investigator. Clause 2.23 clarifies that section 48(3) of the Electricity Industry Act applies so that any self-incriminating statement or document made or

given by an officer or employee, or an industry participant that is an individual, is not admissible as evidence in any criminal or civil proceedings against that person.

- 6.81. Clause 2.21 outlines a process for participants to identify confidential information and clause 2.22 sets out a transparent process for how the confidential information will be handled by the Authority.

Disclosure (IPP11):

- 6.82. Data from the proposed request used on EMI or in our quarterly reports would be aggregated to such an extent that no individual could reasonably be identified. Similarly, any analysis using data gathered under the new request would ensure that no unique piece of data is represented.
- 6.83. We recognise that being able to identify a single ICP by process of elimination has the potential to allow sensitive data to be traced back to an individual. For example, if we aggregate debt data at the regional level by retailer and identifies that a retailer has very few ICPs, we would aggregate the information further, such as to the national level, or exclude the data, until all identifying information is obscured. There will be robust processes in place to check analysis before publication.
- 6.84. It should also be noted that Statistics New Zealand has broad rights under the Data and Statistics Act 2022 to acquire information held by us. Information obtained by Statistics New Zealand may be used for the creation of official statistics or for inclusion in the Integrated Data Infrastructure. Any mandatory acquisition of data by Statistics New Zealand will be subject to the protections of the Data and Statistics Act 2022.
- 6.85. As the proposed request would be mandatory (through clause 2.16) rather than voluntary, we expect that retailers would be able to rely on section 24 of the Privacy Act if they do not already consider IPP11(1)(a) to apply in these circumstances. Our view is that a mandatory request reduces transaction costs for retailers as it simplifies their compliance with IPP11.

Q17 What are your views on the privacy implications of this clause 2.16 notice and the methods we have outlined to manage these?

Q18 (For retailers) Do you foresee this notice creating any new issues or costs for you from a privacy perspective?

7. Appendices

- 7.1. The following appendices are attached to this paper:
- a) Draft Notice: Retail Data.
 - b) Format for submissions.
 - c) Glossary of abbreviations and terms.

Appendix A Proposed Notice: Retail Data

Proposed Notice: Retail Data

This retail data notice is published under clause 2.16 of the Electricity Industry Participation Code 2010 (Code). This notice applies from 1 September 2024.

Overview

Clause 2.16(1) of the Code enables the Electricity Authority Te Mana Hiko (Authority) to publish a notice specifying information that a participant must, on a regular basis or as a result of an identified event, provide to the Authority.

The provision of the required information to the Authority as specified in this notice will enable the Authority carry out its functions referred to in section 45(a) of the Electricity Industry Act 2010 (the Act), including monitoring the effectiveness of market facilitation measures (including the Consumer Care Guidelines), and undertaking industry and market monitoring on an ongoing basis.

To whom the notice applies

This notice applies to all retailers as defined in section 5 of the Act.

When the information needs to be provided

All information is to be submitted monthly. Each request will be made on the first day of the month with the deadline for submission being the last day of the month. If a participant is unable to meet their deadline, they must let the Authority know in advance.

The manner in which retailers must provide the information

Retailers who are required to comply with this notice must upload the required information to the Authority's Information Provision Platform at <https://info.ea.govt.nz/>.

Information that must be provided

The information that retailers are required to provide to the Authority under this notice is specified below. Retailers will need to organise their submission into a series of five relational tables and six short form answers.

The Authority asks that retailers only include data from installation control points (ICPs) with an associated customer identifier that was active during the customers billing cycle that falls within the requested month (ie, exclude vacant properties).

The request is applicable to **mass market and account managed small business customers** only.

For information in a tabular format

The data to be given in a table format is intended to encapsulate the data held within retailers billing systems, including line items a customer would expect to see on their electricity bill and customer debt management information.

Each row in the tables below specifies a single column that should appear within its matching table in a retailer's submission. Some columns may require multiple rows for the same identifier to fully answer.

This notice was designed to encompass all services a retailer may provide in order to give the Authority a complete picture of certain aspects of the retail space. As such, some of the data requested may not be relevant to some retailers where it is relevant others.

If a column is not relevant to a participant, for example, the retailer does not offer this service, collect this data or the service is not applicable for a particular billing period, the Authority asks that the retailer use 'N/A' as their response, unless stated otherwise.

Data submitted should be for billing data in which the last day of the billing period falls in the month prior to the month requested. For example, if the request is made on 1 May 2023, submitted table data should contain billing data where the last day of the customers electricity consumption falls in April 2023 eg, a billing period 20 March 2023 to 19 April 2023 for electricity consumption between 20 March 2023 to 19 April 2023 is submitted for the May 2023 request by 31 May 2023.

For retailers who have billing cycles less than a month long this may mean they need to submit multiple billing cycles for the same customer in a single request. If so simply (as specified above) submit this as additional rows in the tables.

Every column that requests a price should be exclusive of GST unless stated otherwise.

For information in a free field format

Answers to questions should be answered at an aggregate level for each brand the participant processes customer data for.

Answers should contain data that falls within the first and last day of the month prior to the month the request is made. For example, if the request is made on 1 May answers should contain data between 1 April and 30 April.

Tabular Data

Table 1 General

Column	Data format	Definition
ICP	Character	Installation Control Point number
Customer identifier	Character	Identifier for an individual customer. You may use whichever combination of numbers or characters you use internally to identify a unique customer, for example this may be an account number. If this identifier contains personal identifying information on the customer create an anonymous identifier.

		This identifier should remain the same for the same customer where possible, regardless of situations such as leaving then rejoining the retailer.
Account managed	Boolean	Flag for whether the ICP is account managed. Answer '0' if not account managed, '1' if account managed.
Brand name	Character	Name of retailer brand customer signed up to for their electricity supply to this ICP.
Start bill date	Datetime	Start date of billing period for the ICP. Please submit in 'YYYY/MM/DD' format.
End bill date	Datetime	End date of billing period for the ICP. Please submit in 'YYYY/MM/DD' format.
Commercially sensitive	Boolean	Flag as '1' if data for this ICP is considered commercially sensitive else '0' if it is not.
Plan name	Character	Name of plan(s)/membership(s) applied to the ICP.
Contract start date	Datetime	Start date of the latest plan(s)/membership(s) the ICP has assigned ie, if the ICP is currently within a 12 month contract the date should be the first day of the contract. If the ICP is not on a fixed term contract the start date will be the date the ICP first received electricity with the retailer brand. Please submit in 'YYYY/MM/DD' format.
Contract end date	Datetime	End date of the latest plan(s)/membership(s) the ICP has assigned ie, if the ICP is currently within a 12 month contract the date should be the last day of the contract. If the ICP is not on a fixed term contract set this as N/A. Please submit in 'YYYY/MM/DD' format.
Mobile	Boolean	Whether the customer is paying for mobile on the account they pay their electricity through for this ICP. Answer '0' if no, '1' if yes. Leave as N/A if you do not provide this service.
Internet	Boolean	Whether the customer is paying for internet on the account they pay their electricity through for

		this ICP. Answer '0' if no, '1' if yes. Set as N/A if you do not provide this service.
Gas	Boolean	Whether the customer is paying for gas on the account they pay their electricity through for this ICP. Answer '0' if no, '1' if yes. Set as N/A if you do not provide this service.
LPG	Boolean	Whether the customer is paying for LPG (Liquefied Petroleum Gas) on the account they pay their electricity through for this ICP. Answer '0' if no, '1' if yes. LSet as N/A if you do not provide this service.
Other	Character	List any other service or utility that is not mobile, internet, gas or LPG that the customer is paying for on the account they pay their electricity through for this ICP. For example, 'landline and home phone'. Set as N/A if you do not supply any additional services.
Mobile revenue pre-discount	Double	Billed amount for mobile associated with/on the same contract as electricity for the ICP (pre-discount, excluding penalties)
Mobile revenue post-discount	Double	Billed amount for mobile associated with/on the same contract as electricity for the ICP (post-discount; excluding penalties)
Internet revenue pre-discount	Double	Billed amount for internet associated with/on the same contract as electricity for the ICP (pre-discount, excluding penalties)
Internet revenue post-discount	Double	Billed amount for internet associated with/on the same contract as electricity for the ICP (post-discount; excluding penalties)
Gas revenue pre-discount	Double	Billed amount for gas associated with electricity/on the same contract as for the ICP (pre-discount, excluding penalties)
Gas revenue post-discount	Double	Billed amount for gas associated with/on the same contract as electricity for the ICP (post-discount; excluding penalties)
LPG revenue pre-discount	Double	Billed amount for LPG associated with/on the same contract as electricity for the ICP (pre-discount, excluding penalties)

LPG revenue post-discount	Double	Billed amount for LPG associated with/on the same contract as electricity for the ICP (post-discount; excluding penalties)
Other revenue pre-discount	Double	Billed amount for other services associated with/on the same contract as electricity for the ICP (pre-discount, excluding penalties)
Other revenue post-discount	Double	Billed amount for other services associated with/on the same contract as electricity for the ICP (post-discount; excluding penalties)
Electricity revenue pre-discount	Double	Billed amount for electricity for the ICP (pre-discount, excluding penalties)
Electricity revenue post-discount	Double	Billed amount for electricity for the ICP (post-discount; excluding prompt payment discounts, excluding penalties)
Export revenue	Double	Total payment from retailer for any energy exported from the ICP.
GST	Double	Total GST charged for the whole bill
Additional discount	Double	<p>For discounts or incentives not captured by the 'revenue post-discount columns.</p> <p>If the discount or incentive is attributed to a customer account rather than a single ICP choose the ICP which receives electricity to attribute the discount or incentive to.</p> <p>Give the lump sum of the discount(s)/incentive(s), include the RRP (recommended retail price) for any items that are not a direct credit.</p> <p>For example, if an ICP receives a 12 month subscription to a streaming service valued at \$200 for becoming a new electricity customer to the retailer answer '200'. If the customer also receives a free TV as a result of entering into a contract for internet and the RRP of that TV is \$500, add that to the overall total for \$700 and answer '700'.</p> <p>The discount should only show if it is valid for the billing period or the month when the customer first became eligible for it ie, a one-off incentive such as a tv subscription should not appear</p>

		every month if its entire value has been recorded in this column in the previous month.
Prompt payment discount	Double	Lump sum of any prompt payment discount(s) applied to the ICP. Eg, if discounted \$10.00 answer '10', if not discounted answer '0', if you do not apply prompt payment discounts set as N/A.
Prompt payment discount previously applied	Integer	Whether the prompt payment discount was applied to the previous bill following the last data submission ie, whether the customer benefited from the discount by paying by the due date. This has been set as an integer so for billing cycles less than a month the number of bills the discount was applied to can be input. Eg, if the discount was applied to the last monthly bill that was submitted in the previous months data request, answer 1, if it was not applied answer 0. If the discount was applied to two fortnightly bills that were submitted in the previous months data request answer 2, if the discount was only applied to one bill answer 1, if none answer 0.
Late payment penalty	Double	Total value of late payment penalties charged to the ICP. Eg, if penalised \$10.00 answer '10', if not penalised answer '0', if you do not charge late payment penalty fees set as N/A (A late payment penalty does not mean prompt payment discounts which are not received.)
Early termination fee	Double	Total value of any fee(s) charged for the early termination/cancellation of a customer's contract. If a fee is attributed to a customer account rather than a single ICP choose the ICP which receives electricity to attribute the fee to. Eg, if penalised \$10.00 answer '10', if not penalised answer '0', if you do not charge early termination fees set as N/A.
Low user	Boolean	Used to distinguish whether plan at ICP is for low or standard user. Answer '0' if not a low user, answer '1' if is a low user.

Line charges including discount	Double	Line charges charged by distributor including any discounts applied for the ICP. Eg, if costs \$10.00 answer '10'.
MDC	Character	<p>Depending on the medically dependent status of any consumers at the ICP answer 'not dependent', 'verified' and 'unverified'. Set as N/A if you do not collect this information.</p> <p>A Medically Dependent Consumer (MDC) is defined in the Consumer Care Guidelines (Guidelines) (page 33) as: a customer of a retailer or a consumer permanently or temporarily resident at a customer's premises, who depends on mains electricity for critical medical support, such that loss of electricity may result in loss of life or serious harm. For the avoidance of doubt, medical dependence on electricity could be for use of medical or other electrical equipment needed to support the treatment regime (eg, a microwave to heat fluids for renal dialysis).</p> <p>Verified MDC: Retailer has received a completed HP notice (defined page 33 in the Guidelines).</p> <p>Unverified MDC (Guidelines definition page 34):</p> <p>(a) a person who has applied for MDC status but a decision on the application has not yet been made in accordance with Part 8 by the retailer to whom the application was made; or</p> <p>(b) a person whom a retailer believes could be an MDC, unless the retailer has made reasonable efforts to contact the person in accordance with paragraph 90 and the person has not made an application for MDC status.</p>
Primary residence	Boolean	Used to identify whether this ICP is the customer's main residence. Answer '0' if not the main residence, answer '1' if is the main residence.
Prepaid	Boolean	Whether the electricity contract the customer is on is prepaid for the ICP. If the customer at the ICP is not a prepaid customer answer '0', if they are answer '1', if you do not offer prepaid contracts set as N/A.

Spot price	Boolean	Whether the electricity contract the customer is wholesale spot price based for the ICP. If the prices charged at the ICP are not based on wholesale spot prices answer '0', if they are answer '1', if you do not offer wholesale spot priced contracts set as N/A.
Currently available	Boolean	Is the plan the ICP is associated with currently available to new customers? Answer '0' for no, '1' for yes.
Limited eligibility	Boolean	Does the plan associated with this ICP have any additional eligibility criteria beyond the criterion of a basic plan? A basic plan is an electricity only, non-discounted plan where the retailer has not negotiated or otherwise offered the customer a more attractive offer. Answer '0' for no, '1' for yes.

Table 2 Electricity Rate and Consumption

Column	Data format	Definition
ICP	Character	Installation Control Point number
Customer identifier	Character	Identifier for an individual customer. You may use whichever combination of numbers or characters you use internally to identify a unique customer, for example this may be an account number. If this identifier contains personal identifying information on the customer create an anonymous identifier.
Consumption start date	Datetime	Start date of consumption period for the ICP. When combined with 'Consumption end date' this delineates a period of consumption. Please submit in 'YYYY/MM/DD HH:MM:SS' format. If consumption is available in half hourly periods, please use the below 1-50 columns to structure this data and reserve consumption start and end columns for periods of time greater than a half hour.
Consumption end date	Datetime	End date of billing consumption period for the ICP. When combined with 'Consumption start date' this delineates a period of consumption. Please submit in 'YYYY/MM/DD HH:MM:SS' format.

Rate name	Character	Internally used name of any rate charged per kWh at the ICP, eg, 'night', 'daily', 'free hour' or 'hot water'.
Rate	Double	Rate charged per kWh at the ICP as dollars per kWh Eg, if the rate is \$0.34 answer '0.34', if the rate is free answer '0'.
Rate sequence	Integer	<p>If multiple rates apply to the same consumption, please enter a sequence number here eg, 1, 2, 3. This is so that the same consumption charged multiple times at different rates is not double counted.</p> <p>Eg if 20 kWh was consumed in the consumption period of '2023/08/01 00:00:00' to '2023/08/02 00:00:00' and two rates 'A rate' and 'B rate' were applied to that 20 kWh of consumption, rank 'A rate' as 1 and 'B rate' as 2. Every time a rate is applied to different consumption restart the sequence at 1. Eg say there is another period of consumption '2023/08/02 00:00:00' to '2023/08/03 00:00:00' where 10 kWh was consumed at 'A rate' and 15 kWh was consumed at 'C rate' (for a total of 25 kWh for that period) rank both rates as '1'.</p>
Profile code	Character	The profile code is that same as the profile code as defined by the Reconciliation Manager eg, 'HHR', 'RPS', 'UML', etc.
Flow direction	Character	Please enter either I or X for which way the electricity is flowing from the ICP. Either X for Consumption or I for Injection
Total	Double	Total consumption consumed (kWh) for this consumption period for this rate. If for instance the rate charged is a daily rate for no specific kWh of consumption set this field as N/A.
Load control	Boolean	Does this rate include controllable load? Answer '0' for no, '1' for yes.
Periods 1-50	Double	Conditional on HHR data being available there will be columns labelled 1 to 50 for half hourly consumption data. Set as N/A if there is no half hourly data available for this meter.

Actual	Boolean	Used to differentiate whether the consumption is from a meter read or estimated. Answer '0' if estimate, '1' if meter read.
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Table 3 Disconnection

This table applies only to current customers who were or are disconnected from electricity due to non-payment or in the case of prepay disconnected due to insufficient credit (ie, self-disconnections).

Column	Data format	Definition
ICP	Character	Installation Control Point number
Customer identifier	Character	Identifier for an individual customer. You may use whichever combination of numbers or characters you use internally to identify a unique customer, for example this may be an account number. If this identifier contains personal identifying information on the customer create an anonymous identifier.
Start bill date	Datetime	Start of billing period for the ICP. Please submit in 'YYYY/MM/DD' format.
End bill date	Datetime	End of billing period for the ICP. Please submit in 'YYYY/MM/DD' format.
Disconnection remote	Boolean	If the disconnection was done remotely. Answer '0' if no '1' if yes.
Reconnection remote	Boolean	If the reconnection was done remotely. Answer '0' if no '1' if yes.
Disconnection date	Datetime	Date and time of any disconnection that occurred during the billing period. Use 'YYYY/MM/DD HH:MM:SS' 24-hour time format eg, 2023/04/14 16:30:00. If there is no time component available only submit using 'YYYY/MM/DD' format eg, 2023/04/14.
Reconnection date	Datetime	Date and time of any reconnection that occurred during the billing period. Use 'YYYY/MM/DD HH:MM:SS' 24-hour time format eg, 2023/04/14 16:30:00. If there is no time component available only submit using 'YYYY/MM/DD' format eg, 2023/04/14.

Arrears	Double	Total money owed from any previous billing cycle(s), that is now overdue, as at the time of disconnection, prorated on services provided ie, include electricity specific debt only for bundled plans, if able.
Disconnection fee	Double	Any disconnection fee charged for this action. If the customer was not charged a disconnection fee for this disconnection answer '0'. If you do not charge disconnection fees set as 'N/A'.
Reconnection fee	Double	Any reconnection fee charged for this action. If the customer was not charged a reconnection fee for this reconnection leave this column answer '0'. If you do not charge reconnection fees set as 'N/A'.

Table 4 Debt

This table applies only to current customers who are in debt or for whom one of the below debt related columns is applicable. Debt is defined as **money owed for services from any previous billing cycle(s), that is now overdue.**

Column	Data format	Definition
ICP	Character	Installation Control Point number
Customer identifier	Character	Identifier for an individual customer. You may use whichever combination of numbers or characters you use internally to identify a unique customer, for example this may be an account number. If this identifier contains personal identifying information on the customer create an anonymous identifier.
Start bill date	Datetime	Start date of billing period for the ICP. Please submit in 'YYYY/MM/DD' format.
End bill date	Datetime	End date of billing period for the ICP. Please submit in 'YYYY/MM/DD' format.
Electricity arrears	Double	Total money owed for electricity services from any previous billing cycle(s), that is now overdue for this ICP. For example, if submitting billing data for the period between 20 March 2023 and 9 April 2023 and \$140.55 is still owed from the prior billing period 27 February 2023 and 19 March 2023 enter '140.55' or if no money is owed enter '0'.

		If you are unable to differentiate debt between utilities then include all debt in this column.
Other service arrears	Double	Total money owed for other services associated with electricity at this ICP from any previous billing cycle(s), that is now overdue. For example, if submitting billing data for the period between 20 March 2023 and 9 April 2023 and \$140.55 is still owed from the prior billing period 27 February 2023 and 19 March 2023 enter '140.55' or if no money is owed enter '0'.
Extended payment deadline	Integer	Number of times a customer's deadline for payment for electricity at the ICP was extended to help manage the customer's debt when debt management actions were being taken for this account. Eg, '2' if extended twice, '0' if not extended or set as 'N/A' if you do not extend deadlines.
Offered alternate plans	Integer	When debt management actions were being taken for this account the number of times you worked with customers to find a more affordable plan to manage customer debt for electricity at the ICP if the ICP held debt. Eg, '1' if the ICP was in debt and an offer was made to move the ICP to a lower rate plan that would benefit the customer, such as moving to a low user plan from a standard user plan when the customer was eligible, '0' if the ICP was in debt and no alternate plan was offered or set as 'N/A' if the ICP was not in debt.
Contact attempts missed payments	Integer	Number of contact attempts made about missed payments for electricity at the ICP within the previous billing period. Eg, '2' if the customer for the ICP was called twice or '0' if the customer for the ICP was not called. Set as 'N/A' if you do not attempt to contact customers around missed payments.
Contact made missed payments	Integer	An accompaniment to 'Contact attempts' to indicate if contact was made during a contact attempt regarding missed payments. Contact by a customer following up on an unsuccessful attempt is also considered to be contact made so should be included in this number. Eg, '2' if the customer for the ICP was successfully contacted about debt twice or '0' if the customer for the ICP was not successfully contacted. Set as

		'N/A' if you do not attempt to contact customers around missed payments.
Contact channels missed payments	Integer	Number of different contact channels used in attempts to contact a customer regarding missed payments for the ICP. Eg, '4' if call(s), email(s), letter(s) and text(s) were used to make contact with the customer or '0' if no attempts were made. Set as 'N/A' if you do not attempt to contact customers about missed payments.
Contact attempts disconnection	Integer	Number of contact attempts regarding pending electricity disconnection made to the customer for the ICP. Eg, '2' if two attempts were made to contact the customer for the ICP or '0' if no attempts were made. Set as 'N/A' if you do not attempt to contact customers about disconnections.
Contact made disconnection	Integer	An accompaniment to 'Customer attempts' to indicate if contact was made during the contact attempt regarding pending electricity disconnection. Contact by a customer following up on an unsuccessful attempt is also considered to be contact made so should be included in this number. Eg, '2' if the customer for the ICP was successfully contacted about pending disconnection twice or '0' if the customer for the ICP was not successfully contacted.
Contact channels disconnection	Integer	Number of different contact channels used in attempts to contact a customer regarding pending electricity disconnection for the ICP. Eg, '4' if call(s), email(s), letter(s) and text(s) were used to make contact with the customer or '0' if no attempts were made. Set as 'N/A' if you do not attempt to contact customers about disconnections.
Referred support (Work and Income)	Boolean	Whether the customer was referred to Work and Income for any reason related to payment difficulties regarding electricity, or disconnection of electricity, at the ICP. Answer '0' if the customer was not referred and '1' if the customer was referred. Set as 'N/A' if you do not refer customers to support.
Referred support (other agencies)	Boolean	Whether the customer was referred to a support/social agency for any reason related to

		<p>payment difficulties regarding electricity, or disconnection of electricity, at the ICP.</p> <p>Definition in the Guidelines states a support agency means a non-government agency that offers assistance to low-income consumers or consumers facing payment difficulties, including in relation to budgeting, financial assistance, energy efficiency, and counselling and a social agency means a government agency with a statutory function or role to assist low-income consumers or consumers facing payment difficulties.</p> <p>Answer '0' if the customer was not referred and '1' if the customer was referred. Set as 'N/A' if you do not refer customers to support agencies (outside of Work and Income).</p>
Support payments	Double	<p>Sum of payments received from Work and Income or other support/social agencies on behalf of customer for this ICP for this billing cycle prorated on services provided ie, include electricity specific debt only for bundled plans, if able. Eg, if received \$191.50 answer '191.5', if received nothing answer '0'.</p>
Other debt management actions	Character	<p>Select the number from the list of debt management actions below, if any were taken as part of debt management related to payment difficulties regarding electricity, or disconnection of electricity, at this ICP, list these actions with each action added as a single row to this table.</p> <p>This list of debt management actions is based on paragraphs 43/44/45/46 of the Guidelines about managing payment difficulties. Use the 'Other' option if you have taken a debt management action that is not in the list below (you can outline other actions taken (11) in the monthly question below).</p> <p>Options:</p> <ol style="list-style-type: none"> a. Contacted the customer's nominated a support person or alternative contact to assist with communication. b. Provided energy efficiency advice direct to the customer. c. Provided consumption profile reduction advice. d. Suggested the installation of a smart meter. e. Offered load control options.

		<ul style="list-style-type: none"> f. Paused advancing debt accrual while customer is working with Work and Income or another support/social agency. g. Offered payment plan options (to suit customer's circumstances). h. Offered part payments for bundled services. i. Check with customer if consumption monitoring shows large and sudden rises or falls in electricity consumption not due to seasonal effects. j. Regularly monitor and review the customer's ability to meet debt repayments. k. Other
Debt management fee	Double	<p>Any fees charged to the ICP for debt management actions (this excludes late payment penalties) related to payment difficulties regarding electricity, or disconnection of electricity, at this ICP.</p> <p>Eg, if charged \$10.00 answer '10', if not charged answer '0', if you do not charge debt management fees set as 'N/A'</p>
Write offs	Double	Amount of arrears written off within the billing period for the ICP prorated on services provided ie, include electricity specific debt only for bundled plans, if able. Exclude any debt given to a debt collection agency for retrieval.
Debt agency	Double	Lump sum of any debt passed to a debt collection agency for retrieval within the billing period for the ICP prorated on services provided ie, include electricity specific debt only for bundled plans, if able.

Table 5 General Plan

This table's purpose is to gain an overview of retailers' current market offerings.

Column	Data Format	Definition
Plan name	Character	Name of any plan/membership currently being offered by the retailer to new or existing customers.
Brand name	Character	Name of retail brand the plan is offered under.
Plan customer type	Character	Two options available; 'home' or 'business'
Rate name	Character	Rates associated with this plan.
Rate	Double	Dollar per kWh.

On Powerswitch	Boolean	Has the tariff associated with this plan been given to Consumer NZ for the purposes of comparison on Powerswitch? Answer '0' for no, '1' for yes.
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Monthly questions

For these questions, please respond only if your response for the previous month has changed. Responses should be aggregated by brand. Answers are a free field response to be submitted in the matching field supplied in the Information Provision Platform response form.

1. Did you use a load control/flexibility service, if so, what were the details of that service? You may answer this at a yearly aggregate level if you cannot answer this monthly. Note a flexibility provider is a user who provides flexibility services by making temporary changes to the way they or their customers consume, generate, or store electricity when requested.

Details of flexibility services that could be included are:

- a. Number of agreements with flex providers
 - b. Amount of load controlled (specify whether this is in kW or kWh)
 - c. Type of load controlled if applicable eg, EV, batteries, solar
 - d. Conditions for control eg, is it to avoid congestion at certain times or places, adding reserves, adding resilience, etc
 - e. Amount paid/contracted for service
2. If you provide bundled services with electricity outside of mobile, internet, gas and LPG what are those services?

From question 3 onwards, responses should be a monthly aggregate of domestic and small business (small businesses consume less than 40MWh per year) customers only by brand name. For those businesses that have been customers for less than a year, use a prorated approach to monthly consumption to define small business status. Separate responses into two groups, one for verified and unverified MDCs, and the other for remaining domestic and small business customers. If a question is not relevant, leave the response blank.

3. If you answered 'other' in the 'Other debt management actions' question in Table 4: Debt, use this question to outline the additional actions or programmes, if any, are you implementing to proactively support customers who may have difficulty paying their electricity bill or maintaining connection to electricity)? See example actions below:
 - a. Offer bill equalising plans such as SmoothPay
 - b. Weekly bill payment options to assist customer budgeting
 - c. Offer winter energy support programmes or referrals to external providers
 - d. Zero prepay disconnection fees
 - e. No credit checks for new customers
 - f. Offer to switch customers to Time of Use plans with free hour/s of power
 - g. Gifting customers free hour/s of power such as Power Shout
 - h. Provide referrals to housing quality improvement initiatives eg, SEEC, Warmer Kiwi Homes, Healthy Homes Initiative funded programmes or other local community organisations.
4. What is the number of individuals refused electricity supply because of the following:
 - a. failed credit checks / creditworthiness

b. other

5. Of customers who failed a credit check but were accepted for an electricity supply, how many were charged bonds?
- Of those who were charged bonds, what was the average initial value of the bond?
 - What is your credit score threshold or criterion?

Note for question 6 a complaint means “an expression of dissatisfaction made to or about a retailer where a response or a resolution is explicitly or implicitly expected. For example, a complaint may be made by letter, email, phone call, text message or a post on a social page maintained by the Provider, but not on a social media page maintained by the Complainant or a third party.”

6. What is the number of complaints received from consumers sorted into the following categories (for avoidance of doubt, a consumer includes those who do not hold an account with the retailer to which the complaint is directed. This excludes complaints related to large business, commercial, and industrial accounts or account enquires. Any complaint received from non-account holders that reference MDC status should be included within the separate MDC reporting):
- Billing:** includes (but is not limited to) a complaint regarding high bills, billing errors, incorrect or inadequate bill information, fees and charges, and pricing.
 - Customer service:** includes (but is not limited to) a complaint regarding delayed action, failure to act or respond, accessibility (such as phone queue waiting times), failure to follow customer care policy, and complaint handling.
 - Credit/Debt:** includes (but is not limited to) a complaint regarding disputed debt, collection of debt, payment arrangements, SmoothPay, and refusal of service due to poor credit.
 - Prepay:** includes (but is not limited to) a complaint regarding forced transfer to prepay, top up used to repay debt, minimum top up amount being too high, and prepay being unavailable.
 - Energy Marketing:** includes but is not limited to a complaint associated with a retailer’s or its agents/representatives’ actions in seeking to sign up a customer for a contract for electricity supply/service and may include matters such as sales approach or conduct, sales techniques, misleading conduct etc.
 - Switch:** includes (but is not limited to) a complaint regarding unauthorised switches, switches to the wrong property, a delay in switching, and declined switches.
 - Disconnection:** includes (but is not limited to) a complaint regarding completed or pending disconnections about debt (payment/support options not provided), health and safety (disconnection at certain time of day, or disconnecting a Medically Dependent Consumer), inadequate notice, error, delays, or payments being made to prevent disconnection.
 - Connection:** includes (but is not limited to) a complaint regarding new connections about delays, connection costs, and inadequate information, and regarding decommissioning power supplies done in error or delayed.
 - Medically Dependent Consumer Processes:** complaints regarding medical dependency status and process for registering as a medically dependent consumer.
 - Other:** includes any complaint not covered by the categories outlined above.

Appendix B Format for submissions

Submitter	
Question	Comment
Q1. What are your views on the Authority's description of the current issues with its monitoring of the retail market? Are there any additional issues we have not included?	
Q2. The Authority is proposing that retail market monitoring should be through one consolidated, mandatory request, collected on a consistent basis, that is proactively published, cost-effective, and fills identified information gaps. What are your thoughts on this proposal?	
Q3. What are your views on the Authority's proposal that a new Clause 2.16 notice is the correct tool to improve retail market monitoring?	
Q4. What are your views on the ICPs the proposed notice applies to, and do you believe the proposed notice should apply to any other group of ICPs?	
Q5. (For retailers) What is your definition of mass market? Will the request for account managed small businesses capture all the small businesses that fall outside your definition of mass market?	
Q6. (For retailers) What method would you prefer to use to submit your data?	

<p>Q7. Do you have any feedback on the proposed notice (Appendix A)?</p>	
<p>Q8. (For retailers) Would you be able to provide the information requested in the proposed notice backdated to 1 January 2018? If not, what is the earliest date from which you could provide the requested information?</p>	
<p>Q9. What are your views on how the information requested in the proposed notice would meet the Authority's statutory monitoring of competition, reliability, and efficiency in the retail market, and domestic and small business consumers' outcomes? What information do you think is needed to meet the Authority's statutory monitoring requirements?</p>	
<p>Q10. Do you believe the benefits of the Authority having this information outweigh the costs? If not, why?</p>	
<p>Q11. (For retailers) Do you currently provide the Authority with any of the data requested in the proposed notice through any other mechanism that would not be replaced by a new notice (ie, not the RFS notice, or voluntary information provided annually and quarterly).</p>	
<p>Q12. (For retailers) What is the time and cost for you to put the processes in place to provide the data requested in the proposed notice initially and on an ongoing basis (noting the proposed two month implementation period)? What resources would this take? Please provide evidence to</p>	

support any estimates where possible.	
Q13. (For retailers) Do you collect customer or ICP level information on EV chargers? If so, what are the details of this information eg, whether the charger is a smart charger?	
Q14. What are your views on the information the Authority intends to initially publish from the proposed notice, including the proposed level of detail?	
Q15. What information do you believe the Authority should or should not publish? What level of detail do you consider appropriate for publication, and why?	
Q16. (For retailers) What information requested through the proposed draft notice would you expect to mark as confidential under clause 2.21 of the Code?	
Q17. What are your views on the privacy implications of this clause 2.16 notice and the methods we have outlined to manage these?	
Q18. (For retailers) Do you foresee this notice creating any new issues or costs for you from a privacy perspective?	

Appendix C Glossary of abbreviations and terms

Term	Explanation
Authority	Electricity Authority
Act	Electricity Industry Act 2010
Code	Electricity Industry Participation Code 2010
DER	Distributed Energy Resources. Refers to technologies used to generate, store, or manage energy.
Domestic consumer	A person who purchases or uses electricity for domestic premises.
EIEP	Electricity information exchange protocols. These provide standardised formats that support the reliable exchange of information between participants, and participants and other parties. EIEPs are either regulated or non-regulated.
Expert Energy Hardship Panel	The Energy Hardship Expert Panel was established in 2021 as part of the government's response to the Electricity Price Review recommendations. The objective of the Panel, as set out in its terms of reference, is to recommend to government policy priorities and actions to alleviate energy hardship, and provide impartial, evidence-based expert advice. The Panel brings together five leaders from a range of backgrounds who collectively hold key insights, connections and experience working directly with households living in or at risk of energy hardship.
Grid exit point	Grid exit points are the points of connections where electricity flows out of the national grid from large substations to local networks or direct to industrial consumers.
ICP	Installation control point. A unique code assigned to a specific site where electricity is supplied, such as a domestic consumer's house or a business.
Integrated Data Infrastructure	The Integrated Data Infrastructure is a large research database. It holds de-identified microdata about people and households. For more information see https://www.stats.govt.nz/integrated-data/integrated-data-infrastructure/ .
Mass market	<p>Mass market customers are defined in the Code as 'all those customers of a generator retailer or retailer who the generator retailer or retailer classifies as mass market or who are commonly understood to be mass market customers in accordance with standard industry practice.'</p> <p>We are asking retailers to explain how they apply this term as part of this consultation.</p>

Medically dependent consumer	A medically dependent consumer means a consumer, whether a customer of a retailer or a consumer permanently or temporarily resident at a customer's premises, who depends on mains electricity for critical medical support, such that loss of electricity may result in loss of life or serious harm. For the avoidance of doubt, medical dependence on electricity could be for use of medical or other electrical equipment needed to support the treatment regime (eg, a microwave to heat fluids for renal dialysis).
Participant	An electricity Industry participant, these participants are defined in section 7 of the Electricity Industry Act 2010.
Postpay	Refers to a pricing plan where the retailer charges the customer for electricity consumed after the customer has consumed electricity.
Prepay	Refers to a pricing plan that requires a prepayment service and is where the customer pays the retailer for electricity to be consumed, before the customer consumes it.
Registry	The registry is a system that contains information on every ICP in the New Zealand electricity industry. It 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 and is also an important source of information to support reconciliation of electricity quantities. Information in the registry is populated by electricity industry participants.
Retailer	Electricity Industry Act definitions: retailer means a business engaged in retailing. retailing means the sale of electricity to a consumer other than for the purpose of resale.
Regulations	Electricity Industry (Enforcement) Regulations 2010
Small business consumer	A consumer that is not a domestic consumer and consumes less than 40 MWh of electricity per year.
TCP	Time Conditional Plan. These are a type of TOU plan which offer cheaper electricity at certain times of the day when overall electricity demand is likely to be lower.
TOU	Time of Use. Refers to electricity pricing plans that charge a per kWh rate for specific periods of time.