29 February 2024

Electricity Authority

By email to: retaildata@ea.govt.nz

Tēnā koe

Improving retail market monitoring: clause 2.16 information notice

Thank you for the opportunity to provide feedback on the proposed clause 2.16 information notice.

It is great to see simplified data request process and a reduction in the number of requests into one consolidated approach. A simpler, more time-appropriate approach will enable our own teams to centralise their view on each request.

We support an increase in transparency across the energy sector. A better view of the various plans and pricing across the industry will only bring benefits to New Zealand homes, enabling ordinary Kiwis to find the best plan for them and reduce their everyday costs. It's also a great way to strengthen competition and drive innovation in the market, something we do not shy away from. Additionally, it helps give confidence that retailers are making genuine efforts to aid consumers who may be facing financial hardship. We're onboard with all efforts to help educate Kiwis on how to better manage their energy consumption.

However, we have concerns with the scope of the information notice, which has grown the quantity of data being requested as well as raising privacy concerns. Our initial estimates are that the proposal as drafted would carry a significant cost [   ] and would require us to divert teams that would otherwise be focused on product development [   ].

There are five areas that cause us the greatest concern:
1. The request for half hourly data per ICP will require substantial work for us to validate and would provide the EA with an unprecedented insight into every kiwi home.
2. Generating new data on specific client interactions will be costly and unreliable.
3. We are unsure why collecting data on other services that retailers provide, like broadband or mobile, is necessary or within the scope of the EAs responsibilities.
4. The request to back date to 2018 is not possible.
5. Requiring monthly reporting substantially increases ongoing costs, for seemingly no benefit as the data will only be published quarterly.

We do not consider that these high cost features of the proposed regime have been well justified by the EA. Reducing the scope of data requested, and amending the timeframe for which it is requested is appropriate and will still enable the EA to achieve its objective.

Attached to this submission we have also provided comments on the consultation questions and detailed feedback on the proposed information tables. As part of this we have highlighted areas where the definitions of the data and possible methodologies of data gathering are open to interpretation across retailers. With such granular data, this may lead to misleading outcomes when comparing retailer data.

Energy Wellbeing at Contact

In an effort to lead global decarbonisation efforts, New Zealand has set itself ambitious climate change targets. While these goals are for the long-term benefit of all New Zealanders, it has the potential to increase costs on some of our most vulnerable communities in the short-term. The energy trilemma of Energy Security, Energy Sustainability and Energy Affordability present a constant balancing act to develop new renewable generation while keeping the lights on in an affordable way for Kiwi homes. The ongoing cost-of-living crisis has highlighted the importance of getting this balance right.

Recognising energy affordability and equity as a strategic priority, we have adapted the way we deal with customers who may be struggling to pay their bills. To support customers, we offer flexible payment and billing arrangements to help spread their costs throughout the month. Our dedicated Energy Wellbeing team are also working with customers and community partners to establish pathways for Kiwis who are struggling to get on top of their bills. For example, we refer customers to EnergyMate to help them understand their energy use at home and have formed strong relationships with Women's Refuge and Good Shepherd. We are particularly proud of our Women's Refuge partnership, providing free power to their many locations, as well as offering free electricity to homes Women's Refuge have referred, where some of New Zealand's most vulnerable live.

We're also focusing our teams on new products that make energy more equitable for our mass market customers, offering plans that aim to shift consumer demand to periods where they can earn savings, with the added benefit of reducing generation-related emissions. An example of this was the release of our Good Nights plan, where [   ] customers currently get free electricity from 9pm-12am every day. The success of Good Nights led us to release Good Weekends, a separate plan where electricity is free from 9am-5pm every Saturday and Sunday. To encourage our customers to consider purchasing EVs, we've also released our Good Charge plan, offering half price power from 9pm-7am when people are most likely to recharge their vehicles.

To help customers understand how their behaviour at home may impact their electricity bills, within the last two years we've developed functionality through our App and website to breakdown invoices. One of the pain points we heard from customers was difficulty in understanding their bills, so through a customer-led process, we developed a 'digital bill' that re-organised the information into a more user-friendly design. Utilising smart meter data, we've also introduced an online feature to display customer consumption and charges for electricity down to an hourly level. Developing these functionalities acts as an enabler for customers to learn how and why their power usage may fluctuate over time.

However, we know that some Kiwis struggle to find energy accessible in the first place due to poor credit history. Considering this, we're proud of our Prepay product as an avenue to energy accessibility without higher prices or fees. With disconnection being a last resort, Prepay allows us to offer customers an opportunity to reduce their debt while keeping the lights on. We've found in the past that once debt reaches a certain level, the task of paying back the debt can seem insurmountable. Applying a portion of payments to their debt means those customers can slowly chip away at it without risk to their credit ratings.

As demonstrated, we're invested in helping Kiwis better manage their energy costs.

Scope of data requested

The significant increase in data requests being proposed raises a few concerns, pertaining to the volume of data being requested, the feasibility in providing data and privacy and security of the data being transmitted.

Volumes

The paper proposes to collect datapoints at an ICP level across the board, de-aggregating data that was previously summarised, such as debt data provided in the Retailer Financial Stress requests. Of note is the request for half hour consumption data for each ICP, split by rates and trading periods in *Table 2 Electricity Rate and Consumption*. With over 400k ICPs currently supplied, 92% of which are smart meters, this will lead to a massive amount of data being produced. We are not convinced the volume proposed is necessary for the EA to achieve its goals.

The EA has also requested data on other services offered by retailers, such as telecommunications services. It is not clear to us that this information is necessary for the EA, or within its scope when the EAs ambitions are to understand *"how bundled plans may affect consumer price incentives around* electricity *and the impact they may have on competition in the retail electricity market."* We also note that the Commerce Commission already collects significant data on telecommunications services, which do not need to be duplicated.

Significant work will need to be invested to provide even high-level verification of the data we are supplying. This is exacerbated by the need to provide such a wide scope of data; aggregated data is much easier to supply than data every half-hour for ever ICP.

We'd also challenge the assumption that "*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*" as outlined in page 23. A larger volume of granular data introduces room for error, particularly if the data is to be provided frequently. For areas where we may be missing data or have corrupted data, we can no longer aggregate, and will need to invest more resource to resolve, and this is a very real prospect for half-hour consumption, as we face these challenges today. [ ] Mobile network outages, meter tampering and MEP errors are examples of why half-hour exceptions are so prevalent. Sometimes we lack data for a reason as simple as someone parking a caravan in front of a meter.

Additionally, the EA has stated it will be producing a quarterly report summarising the data received and making this publicly available to all stakeholders. With that in mind, and to reduce resource allocated on an ongoing basis to provisioning data, we'd support quarterly requests as opposed to monthly requests proposed in paragraph 6.62.

Feasibility

Computing and integration costs aside, much of the data being requested does not currently exist. The majority of this lies within *Table 4 Debt*. Our staff have been trained to refer customers in debt to external assistance services and have been working directly with WINZ for many years. Our contact centres have also had material developed, and training provided, to help customers choose the right plan for them, and share tips on being more energy efficient. While we have been taking actions such as these for several years, we have not had a feature built-in to capture the number of interactions where this has occurred. Therefore, we will not be able to supply historical data for these requests and will need to create system changes to capture these interactions moving forward.

Requiring IT resource to develop and test these changes, as well as frontline training, developing this functionality will be no small feat, requiring us to divert off other work focused on market innovations. Furthermore, given the pace our contact centres operate at, any reporting on this data would likely understate the level of engagement we provide. Without precise definitions on what's being requested, retailers may differ in what they consider meeting requirements (i.e. Contact attempts). Additionally, with such granular requests, data gathering methodologies will vary between retailers depending on capacity and resources available, as some can afford AI to read text, and others will rely on wrap-up codes. This can produce misleading insights or outcomes when data is being compared.

We are unable to provide historic data going back to 2018. Recently we underwent a platform migration, and while the majority of data requested is accessible from 2023 onwards, going further back will come at a significant cost and produce low quality data, undermining the integrity of what's being provided. We appreciate the objective trying to be achieved going beyond Covid, however do not currently see a net-benefit in providing data this far back. Better to start a strong foundation with high quality data, than rely on questionable data from years gone by.

Privacy and security

ICP-level data surrounding debt and consumption patterns is very personal, and we are cautious about supplying data at this level. This data would provide the EA with unparalleled insight into the daily lives of New Zealanders. Staff at the EA will be able to tell when each household wakes up in the morning, when they leave the house, and when they go to sleep again. If (as proposed by the EA) half-hourly electricity usage data is combined with information from the IDI datasets the EA will have further deep insights the lives of everyday New Zealanders.

We have responsibilities to our customers to ensure their data is protected. We would therefore expect that the Privacy Impact Assessment would include details on how to ensure safe transfer of such massive data sets, access controls within the EA, cybersecurity measures, and more.

We cannot understate how important it is to ensure that it is absolutely necessary for the EA to have this level of information. For privacy reasons alone it may be more appropriate for the EA to collect aggregated data (a repeating theme) as has been the case in the past.

The need for this data is not clearly defined

We do not consider that the consultation paper adequately justifies the need for the proposed data request, particularly given the high costs of complying, and privacy implications.

We support many of the features of the regime proposed in section 4 of the consultation paper, including consistent collection of data across all retailers, and consumers, while minimising costs. It is beneficial to publish this data as a point of comparison for consumers and to encourage competition on customer service metrics.

Our main concern is with the assumption that it is necessary for the EA to fill all information gaps (at a very high cost, inconsistent with the final feature). This has the line of reasoning backwards. Requests for information should instead be justified on the basis of the improved outcomes for consumers.

The information gaps identified by the Authority fall into three main categories:

1. Detailed information on billing, consumption and customer behaviour
   - The level of granularity requested by the EA is not justified by the need to monitor market competition, reliability and efficiency. No competition analysis requires micro-level assessment at every meshblock every half hour.
   - Uptake of plan types, pricing, switching, etc can be gathered at a more aggregated level at considerably lower cost.
2. Monitoring market innovations, such as uptake of time of use plans
   - There are much lower cost ways for the EA to gain this insight. For example, we are happy to periodically meet to discuss with the EA our experience of these plans.
3. Transparency on the treatment of consumers in hardship
   - We are proud of our full compliance with the Consumer Care Guidelines. However, it is highly inefficient to assess compliance at a customer interaction level. the EA has not justified why the current compliance regime is inadequate.

We recommend that the EA has a closer look at the problems it is wishing to address, and what the minimum level of information is needed to address it. This would result in a proposal that is better value for consumers.

Please contact me at ████████████████████████ if you wish to discuss further.

Ngā Mihi

Brett Woods

Head of Regulatory and Government Relations

Contact Energy

Submission tables:

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?	Agree with the proposal, but challenge what's considered 'cost effective' and how frequent the 'consistent basis' needs to be. It is not clear why data is requested monthly, while it is only published quarterly. We also believe the Authority is underestimating costs to implement and maintain the data requests.
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?	We are unconvinced data needs to be provided at an ICP level, however agree with the mass market scope.
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?	Mass market includes all residential and SME customers. Account managed customers fall within the definition. Only Commercial & Industrial customers fall outside mass market.
Q6. (For retailers) What method would you prefer to use to submit your data?	Preferably DeltaLake, subject to costing.
Q7. Do you have any feedback on the proposed notice (Appendix A)?	We have concerns about the level data being requested at ICP level, with regards to volumes and privacy. Providing half hour consumption data down to a rate level will require the production of large amounts of data, to be submitted monthly. We are unsure why financial stress information is required at ICP level as well, and this is where most of our privacy concerns lie. We see the proposal as asking for an unprecedented amount of data on people's lives.

Furthermore, we will be unable to provide some interaction-based data without more |

	time to develop the functionalities. We will require longer than two months to do so.
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?	We would be able to provide the information, where available, to 1 January 2023.
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?	We welcome the transparency the data will provide to the market and to external stakeholders, such as consumers and consumer care groups. There is a lot of misrepresentation about how retailers have cared for customers in the past few years, as well as the level of investment going into retail innovations, so the Authority consolidating information and presenting a source of truth openly will aid in clearing any uncertainties. Figures used in articles tend to be a few years old, so we are eager to see more up-to-date data become available.
Q10. Do you believe the benefits of the Authority having this information outweigh the costs? If not, why?	At the ICP level, we do not believe so. We predict the costs to implement the data provisions, on top of the ongoing costs for requests, hosting, and querying of data are higher than the Authority is suggesting. At an aggregated level, we believe the benefits do outweigh the costs.
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.	Current estimates are significant [ ]. Initially: We'd need SAP developers and testers to implement functionality to capture interaction-based data (i.e. alternative plans offered) that isn't currently captured. Our call centre teams would need change management resource to introduce the new functionality, and train staff on using it. We'd also need data analysts and data engineers to design, develop and test each of the tables being requested as they do not exist in a consolidated view. The

	data teams would need to work with our operation teams to understand nuances in the data being pulled together (i.e. gaps in half hour consumption data). Any backloading takes additional time to calculate and compile, which will be significant for half hour consumption. Ongoing: Data analysts to extract the data and check it. Retail managers to review and verify the data. Billing and network team members to handle exceptions and clarify any gaps in the data.
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 do not.
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?	We believe information that requires context from retailers should not be published. For example, rates and rate names, availability of plans, limited eligibility ICPs. We see meshblock analysis as too granular and would support regional level analysis.
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?	All information as it stands at an ICP level.
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 A tables:

Table 1: General

Column	Comments
ICP	
Customer identifier	
Account managed	
Brand name	
Start bill date	Is the intent that the dataset provided for a calendar month a) includes all the bills created in that calendar month (this would include reversal/rebills for bills from past periods, which will mean the aggregate dataset held by the EA is kept up to date but may create complexity to account for reversed bills) or b) include only bills where the end date of the bill is within the calendar month (which will mean changes made to past bills will never be reflected in the overall data set compiled by the EA)? It will be important to provide clarity on this to ensure all retailers approach the reporting in the same way. With either approach, we note the EA should expect to receive multiple rows for some customers, for example in the case of customers being on weekly or fortnightly billing.
End bill date	As above.
Commercially sensitive	All information at an ICP level is commercially sensitive.
Plan name	Is the EA expecting to be able to join this to the Plan name column in Table 5 and get a unique set of tariffs? If so, additional dimensions will need to be added to both tables (either as separate columns or concatenated into the value of Plan Name). For example, "Good Nights" in isolation won't be sufficient to provide that ability to match. We will need instead to have something like "Good Nights in Vector network on Low User on X price category on Y meter setup". It may also be necessary to include a time dimension in table 5 that links to the bill dates (which will create some complexity) to account for changes to prices over time. An additional challenge is that some bills may have multiple plans if customer has changed during billing, what's the expectation?
Contract start date	If a customer has been on a mixture of fixed and open term plans and is currently on an open term plan, is the intent to capture the first date the current customer

	received electricity with the retailer or the start date for the customer's current plan/contract? We note that in the latter case, we would have challenges with data quality, as from time-to-time changes on a customer's account may update the contract start date in our system.
Contract end date	
Mobile	[ ]
Internet	
Gas	
LPG	[ ]
Other	
Mobile revenue pre-discount	[ ]
Mobile revenue post-discount	[ ]
Internet revenue pre-discount	
Internet revenue post-discount	
Gas revenue pre-discount	
Gas revenue post-discount	
LPG revenue pre-discount	
LPG revenue post-discount	
Other revenue pre-discount	
Other revenue post-discount	
Electricity revenue pre-discount	
Electricity revenue post-discount	
Export revenue	
GST	
Additional discount	We do not currently capture this data in a structured format and not all discounts pass through our billing system but are add-ons.
Prompt payment discount	

Prompt payment discount previously applied	
Late payment penalty	
Early termination fee	
Low user	
Line charges including discount	Data is complex. We can estimate, but some networks charge at GXP level, and distributors have variable billing methods. We do not have control on distributor charges. What is the use for the data?
MDC	
Primary residence	We do not collect this information.
Prepaid	Makes more sense for Prepay information to be provided in a different format, as it does not align with Postpay billing methodology. More info below.
Spot price	
Currently available	This depends on the definition of a plan. I.e. is a refreshed plan with new rates considered to be the same plan? We also do not capture this as structured data.
Limited eligibility	Is a simple yes/no good enough for this? It would be good to describe if the limitation was related to metering, etc. We also do not capture this as structured data. Without context the data is not useful.

Table 1 comments:

- We have some accounts that have multiple electricity ICPs. There are scenarios for 1x account to have 1x electricity only connection, 1x electricity + natural gas connection and 1x electricity + broadband connection – all that are invoiced together. How would the EA expect to receive account fee information? The current request is asking to group at ICP + customer level.
- Our Prepay product does not follow conventional billing methodology. Data presented for Prepay customers won't align with what a typical Postpay customer sees, as the Prepay customer does not receive a monthly bill, rather sees a running balance. We would suggest a different format for Prepay billing and are happy to work with the EA to produce a format.

Table 2: Electricity rate and consumption

Column	Comments
ICP	
Customer identifier	
Consumption start date	
Consumption end date	
Rate name	Using internal rate names will create ambiguity across retailers and will lead to enquiries from the EA if the data is being compared. In addition, if wanting to link this to customer data, more info is required as noted in our comments for table 1.
Rate	
Rate sequence	Aggregating data appears to be a simpler solution
Profile code	
Flow direction	
Total	
Load control	
Periods 1-50	Roughly 22 million rows - however this does not work with plans that work off different daily pricing as opposed to half hourly pricing. I.e. Our Good Weekends plan has one rate during weekdays, and different on weekends. Please advise how you would expect the context to come through in the data, and how it would be useful.
Actual	

Table 2 comments:

- Only variable charges are being asked for in this table. Fixed charges are a core component of pricing plans, so it seems like a gap to be excluding this information.
- Is the intent for this table to also capture levies (often charged as cents/kWh) which are sometimes considered to be separate to tariffs, and/or fees (often charged as one-off dollar amounts)?

Table 3: Disconnection

Column	Comments
ICP	
Customer identifier	
Start bill date	Prepay customers do not receive an invoice. Do we populate blank or use our billing for settlement purposes?
End bill date	See above
Disconnection remote	
Reconnection remote	
Disconnection date	Assuming multiple rows will exist if multiple disconnections have occurred within a single billing period.
Reconnection date	
Arrears	
Disconnection fee	
Reconnection fee	

Table 3 comments:

- This data is better fitted to the reporting month as opposed to the customer's billing period. Arrears are accumulated over multiple billing periods.
- Are Prepay disconnections expected to be captured in this table? If so, a reporting month timestamp is more appropriate than the start/end bill date, as Prepay customers do not receive bills.

Table 4: Debt

Column	Comments
ICP	
Customer identifier	
Start bill date	Using bill dates leads to challenges for customers that aren't on monthly Postpay billing. We suggest a reporting month timestamp instead to ease implementation.
End bill date	See above.
Electricity arrears	
Other service arrears	Unclear if this is in the EAs remit. Gas + BB + other charges are not necessarily tied to the electricity ICP
Extended payment deadline	We don't extend deadlines because we put customers onto payment plans or don't take collection action - will always be NA. We use 'credit locks' to cease credit activities, however this can be for a number of reasons (e.g. as a compassionate consideration following a natural disaster such as the cyclone in 2023). Context is important
Offered alternate plans	We do not currently capture this information as structured data. While we could make system changes to begin to capture this data this would be costly and we note that there are a number of different approaches that retailers may take to attempt to provide this data (e.g. requiring agents to record the information, using AI on conversation transcripts, or recording whether a plan change was made in the period of time after the conversation). These differences in approach may invalidate the data for comparison purposes.
Contact attempts: missed payments	Need definition of contact methods. We send emails, letters, SMS' and call, and different retailers may have different interpretations. While we can report on outbound contact attempts made within the previous bill date window, we note that we cannot guarantee the content of the interaction related specifically to disconnection or missed payments or both. While we could make system changes to begin to capture this data this would be costly and we note that there are a number of different approaches that retailers may take to attempt to provide this data (e.g. requiring agents to record the information using different criteria or using AI on conversation transcripts). These differences in approach may invalidate the data for comparison purposes.

	The definition for this field refers to attempts within "the previous billing period"; we assume the EA understands that contact attempts within the previous billing period may relate to unpaid amounts for bills several bills before that previous billing period (especially if a customer is on a shorter billing cycle such as weekly or fortnightly) and not to that period itself.
Contact made missed: payments	As above.
Contact channels: missed payments	As above.
Contact attempts: disconnection	Need definition of contact methods. We send emails, letters, SMS' and call. We send emails, letters, SMS' and call, and different retailers may have different interpretations. While we can report on outbound contact attempts made within the previous bill date window, we note that we cannot guarantee the content of the interaction related specifically to disconnection or missed payments or both. While we could make system changes to begin to capture this data this would be costly and we note that there are a number of different approaches that retailers may take to attempt to provide this data (e.g. requiring agents to record the information using different criteria or using AI on conversation transcripts.) These differences in approach may invalidate the data for comparison purposes.

The definition for this field refers to attempts within "the previous billing period"; we assume the EA understands that contact attempts within the previous billing period may relate to unpaid amounts for bills several bills before that previous billing period (especially if a customer is on a shorter billing cycle such as weekly or fortnightly) and not to that period itself. |
Contact made: disconnection	As above.
Contact channels: disconnection	As above.
Referred support: (Work and Income)	We capture some data related to this, however not all. We will be under-reporting using existing data capture.
Referred support: (other agencies)	We do not have functionality to capture when or if these interactions occurred. Existing data is not structured.
Support payments	We have curated data for WINZ payments, but not other agencies.

Other debt management actions	We do not have functionality to capture when or if these interactions occurred. Existing data is not structured.
Debt management fee	
Write offs	Billing period is inappropriate for this data.
Debt agency	Billing period is inappropriate for this data.

Table 4 comments:

- What is the expectation for Prepay data and balances within the debt-recovery function of our Prepay product? For context, some customers have a debt-balance when moving to Prepay to avoid disconnection. This debt is repaid as a portion of all payments towards the customers Prepay balance.
- Methodologies to capture interaction-based data will differ between retailers without clearer definitions on data requirements. For example, some retailers may use AI to read interaction notes, some may have a tickbox for customer service reps etc. These differences would invalidate comparisons between retailers.
- Write offs and debt agency referrals occur following a customer's account being closed and are not reflected on an invoice.

Table 5: General Plan

Column	Comment
Plan name	This table is more useful with a region/network dimension as well. Pricing varies based on a number of factors including location, network price category, standard vs low user etc. Without these differentiators, the EA can expect to receive huge numbers of rows with duplicate plan names and the data becomes meaningless.
Brand name	
Plan customer type	
Rate name	
Rate	Definition suggests the data is for variable pricing only. Fixed pricing and levies are core components of a pricing plan.
On Powerswitch	We do not have structured data for this. Historical data is unavailable. Work would be required to implement changes to capture this going forward.

Table 5 comments:

- We would suggest that this table will need a lot more info to be useful. Without knowing context of the use, it's difficult to suggest additions to the EA. We would be happy to work with the EA to understand their objective and offer advice on the necessary schema.
- There are other charges (daily charges, levies, fees, unmetered consumption etc) that are missing and will not enable the EA to reconcile consumption or rates with revenue if that is the EAs goal.

Monthly questions:

Column	Comment
Did you use a load control/flexibility service, if so, what were the details of that service?	
If you provide bundled services with electricity outside of mobile, internet, gas and LPG what are those services?	
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)?	
What is the number of individuals refused electricity supply because of the following: a. failed credit checks / creditworthiness b. other	We don't have data tying the credit check to the electricity supply. Implementation and ongoing costs will be incurred to provide this data. We note that we do not have 'other' refusal reasons captured in a structured format, e.g.. customer threats would result in refusal. We are concerned that this measure could be quite misleading. A better measure may be to report properties not connected as often we find that if one person in a house is rejected for credit reasons another person at the property will apply instead, or they will shop around, and eventually find a way to get connected.
Of customers who failed a credit check but were accepted for an electricity supply, how many were charged bonds? a. Of those who were charged bonds, what was the average initial value of the bond? b. What is your credit score threshold or criterion?	

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): a. Billing: b. Customer service: c. Credit/Debt: d. Prepay: e. Energy Marketing: f. Switch: g. Disconnection: h. Connection: i. Medically Dependent Consumer Processes: j. Other:	We capture complaints information however our categorisation will need updating to match what the EA are requesting. We note that there are a number of different approaches that retailers may take to attempt to provide this data (e.g. requiring agents to record the information using different criteria or using AI on conversation transcripts.) Further, it is not uncommon for a complaint to cover more than one of the stated territories and without clear guidance on how to categorise a complaint it is likely that very different approaches will be taken by retailers. These differences in approach would invalidate the data for comparison purposes.

Other comments:

- For areas where we do not have structured data captured, there will be implementation costs as well as ongoing costs to develop and maintain the data structures required. This has been fed into the cost estimation that was provided in our written submission. Estimations take into account feature development for our CRM, data structure design/development/testing, staff training, and review/verification processes.
- For areas with structured data, we can go as far back as the start of 2023.