



January 2024

Retail Data

Electricity Authority

PO Box 10041

Wellington 6143

Consultation on Improving retail market monitoring

This submission supports the Electricity Authority's proposed changes to clause 2.16 information notice to improve retail data monitoring.

I am submitting as one who wishes to develop retail level demand flexibility aggregation services. A key precursor to the viability of any such demand flexibility aggregation services is the availability of spot price exposed retail tariffs, as highlighted by MDAG's final recommendations on price discovery in a renewables based market. The proposed changes enhance the Authority's ability to monitor progress on development of such tariffs and this on its own justifies the proposed change. The only enhancement I would like to see to the proposal is the publication of aggregate data on the availability and uptake of spot price exposed retail tariffs.

No part of this submission is confidential and I am happy for my submission in its entirety to be released publicly.

Regards

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Response to specific consultation questions

Appendix B Format for submissions

Submitter	Neil Walbran Consulting Ltd
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?	Generally agree. No additional issues but would like to see more emphasis on the value of monitoring availability of spot price exposed retail tariffs as highlighted by MDAG.
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?	Support
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?	Agree
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?	Support
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?	Not applicable
Q6. (For retailers) What method would you prefer to use to submit your data?	Not applicable

<p>Q7. Do you have any feedback on the proposed notice (Appendix A)?</p>	<p>No</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>Not applicable</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>Support. I can see real value in particular in monitoring of availability and uptake of spot price exposed tariffs as such tariffs will be a key enabler of demand flexibility development as identified by MDAG.</p>
<p>Q10. Do you believe the benefits of the Authority having this information outweigh the costs? If not, why?</p>	<p>Yes, the benefits of greater demand flexibility development at the retail level are likely to be significant, as previously estimated by MDAG. The Authority has a role in facilitating the development of demand flexibility and monitoring retail tariffs which encourage such development is a legitimate role for the Authority.</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>Not applicable.</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 support any estimates where possible.</p>	<p>Not applicable.</p>

<p>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?</p>	<p>Not applicable.</p>
<p>Q14. What are your views on the information the Authority intends to initially publish from the proposed notice, including the proposed level of detail?</p>	<p>Would like to see aggregate information on availability and uptake of spot price exposed tariffs included in published information.</p>
<p>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?</p>	<p>As above I would like to see availability and uptake of sport price exposed tariffs included. This could be at quite a high level of aggregation but ideally should identify which retailers offer such tariffs.</p>
<p>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?</p>	<p>Not applicable.</p>
<p>Q17. What are your views on the privacy implications of this clause 2.16 notice and the methods we have outlined to manage these?</p>	<p>No views.</p>
<p>Q18. (For retailers) Do you foresee this notice creating any new issues or costs for you from a privacy perspective?</p>	<p>Not applicable.</p>