Outlook

Consultation Paper—Product Data Standards

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To Consumer Mobility <consumer.mobility@ea.govt.nz>

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Non-Standard response to EA Consultation paper: Enabling consumer mobility by improving access to electricity product data

Introduction

This response is made by Paul Chapman, manager – energy and risk management at Energy Link with a quarter of a century of experience in the NZ electricity industry including contributing to the development to the EIEP13 standards. The response reflects the writer's personal views which are not necessarily those of Energy Link.

Clarification

It is assumed the difference between a standard and a non-standard/customised plan is a matter of degree. A standard plan (synonymous with a 'generally available retail tariff plan') is one targeting residential and small business consumers supplied through revenue meters eligible for (but not restricted to) reconciliation against an RPS. A non-standard plan targets similar consumers but is subject to eligibility criteria such as having a smart meter or only receiving bills electronically.

Customisation, such as offering a loyalty discount for a consumer choosing to stay with the same retailer, may be generally applied (e.g. a standard loyalty discount) but may be specific to individual consumers depending on other commercial factors.

It is assumed that supply arrangements not included under 'all tariff plans' (EIEP-14B option 3) are those provided to larger commercial and industrial consumers historically associated with mandatory half hourly reconciliation. While such plans may be based on generally applicable pricing schedules, these schedules are subject to frequent change (often weekly), adjusted to specific consumption profiles and may be embedded in more complex arrangements such as progressive fixing of price or sleeved with power purchase agreements.

Alternative Approach

None of the options proposed in the consultation document are considered likely to significantly increase customer mobility and an alternative approach is proposed.
The simplest and most effective way of achieving the Authority's objective of improving customer mobility has two components:

- Creation of a central database of all standard and non-standard plans but excluding individually customised plans (i.e. non-standard plans where customisation of a tariff element has been applied differently than would be the case for other consumers with identical eligibility).
- Require all plans to be associated with a unique identifier (ID) generated during the registration process in the central database. This ID would be used as a mandatory data field against the ICP in the Registry and a trader would not be able to take over an ICP, either for a switch or a new connection, without providing the ID of the associated plan. A grace period for new connections will be required as networks will need a trader to be specified when creating a new ICP in the Registry (which may precede actual supply and plan allocation to a connection). The ID field for ICPs supplied with arrangements exempt from registration in the central database would be coded to provide the type of exemption so a to distinguish between plans exempted due to customisation of a plan existing on the database from those that are fully customised (which could provide on retailer activity useful insights to the Authority).

Advantages

The main advantages of this approach are:

- Decreased retailer burden:
    - A plan need only be created and registered once, avoiding the expense of developing and maintaining a robust API (or alternative and burdensome manual data preparation steps)
    - Development of an API or other data preparation processes represents an additional barrier for new entrant/startup retailers
- Increased consumer certainty and mobility:
    - The database would provide a single, authoritative version of the truth enabling consumers, brokers and third parties to unequivocally identify the plan currently associated with an ICP
    - The database would similarly enable consumers, brokers and third parties to unequivocally identify and compare eligible retail offerings
    - The database would facilitate third parties to offer advanced services, for example:
        - Online/automated bill checking
        - Alerting the availability of a more cost-effective plan (even automatic switching under controlled criteria including passing on the requested plan's ID)
        - Realtime forecasts of expected energy costs based on tariffs and other data such as historical consumption patterns, and weather and wholesale electricity price forecasts
        - Advanced modelling of plans that incentivise consumers to:
            - change their consumption behaviour and/or technologies
            - take more price risk
            - use and invest in DER and DR technologies
            - engage multiple retailers at a connection (when MTR becomes effective)
            - join localised aggregation arrangements
- Switching efficiency: by centralising the database a closer linkage with the Registry could improve the conversion of switch requests through vetting against eligibility criteria
- Consistency of access control: a centralised database would facilitate fair and consistent of access controls (as deemed necessary) - e.g. bulk plan downloads could be made available only to parties authorised by the Authority to use the Registry hub

Data Privacy and Commercial Sensitivity

Privacy and commercial sensitivity issues will be present regardless of which solution the Authority adopts. However, allowing full public access to all registered plans and the ICP to plan mappings will deliver the highest level of benefit to consumers.

It is possible to argue this situation is already close to a reality. Admittedly with some effort it is possible to use the public online Registry interface (Your meter) to identify the ICP associated with a street address, and with the details of the metering configuration at the ICP use the incumbent retailer's website to identify the (typically small number) of plans the ICP is eligible for. It would not be possible to identify if an ICP is associated with a legacy plan this way.

Retailers may object to public access to their plans, however over recent years most retailers have listed their plans for use on the Powerswitch website. Listed retailers have been able to purchase a full set of currently listed plans for listed retailers, including legacy plans, used by Powerswitch from Consumer NZ. Why should consumers, brokers and third-party service providers not enjoy the same advantage?

Under this approach the additional data exposure from greater public access would be the linkage of a consumer to a specific plan, rather than a small number of plans (excluding legacies). The increased ease of access to plan and ICP information could lead to more aggressive and potentially unwelcome targeting of individual households. This should be balanced against the additional benefits consumers could accrue through superior online services to help them select, maintain and adapt their supply arrangements in response to changing market conditions and retail innovation.

Metering

While rapid access to data linking a consumer to all eligible plans would be a multiplier for electricity retail competition in the short term, access to accurate metering data would be an order of magnitude more useful. Such access would perhaps initially do more to help consumers make better purchasing decisions than directly raising mobility. However, as the information and technology environment around electricity supply evolves, access to detailed metering data will be essential in avoiding the obstruction of mobility as the pros and cons of complex plans (such as the time varying plans mandated by the Authority to be available from 1 Octboer 2026) become more difficult to assess with only highly aggregated consumption data.

Metering data is currently collected by MEPs, sent to retailers and repackaged for EDBs through EIEP1 and EIEP3 formatted files and the reconciliation manager through AV-080,A V090 and AV-120 formatted files). It is passed around the industry and, also, collected by the Authority, in many cases at half hour granularity. Perhaps beyond the immediate scope of this response but the logic used to argue for a central plan database also applies here: create once and provide access to all authorised parties (EDBs, Reconciliation Manager, Retailers, Consumers and their Agents).
Data protection issues will be more complex with metering data and will require consumer authorisation to access specific metering details. Another obstacle will be determining at what points in an ICP's metering history has ownership of the data transferred (as occurs when ownership of a house changes hands).
Assuming considerations around privacy and access control can be satisfactorily managed, the benefits for competition and innovation attainable with rapid access to an integrated set of Registry, Retail Plan and Metering data is almost self-evident.

Data Exchange Standards
Data sharing requires the provider and the user to have a common and unambiguous understanding of the meaning, context and inter-relationship of shared data items (especially when that data is shared through automatically generated messages and stored in structured databases). The approach proposed would still require standardised protocols to fulfil a data transfer role similar to that advanced by the Authority for the EIEP14 standards in option 3.
Development of any standard involves considerable work. As the retail market evolves so will the complexity of the data model required to fully capture a plan. In a retail sector that encourages robust innovation it can be expected that transfer file formats (and underlying data storage structures) will need to constantly adapt. Design for minimising the impact and number of changes required, while maintaining backward compatibility and version control will be critical.

Conclusion
This response suggests that development of a data interchange standard independent of a database directly related to the standards will, like the existing EIEP13s and EIEP14, result in patchy and ineffective implementation of those standards – even if mandated.

Reluctant as this writer is, in these fiscally constrained times, to suggest that taxpayer money should be used to facilitate a competitive market - it is nonetheless suggested.

The taxpaying consumer will reap ongoing benefit, in excess of initial outlay, through a wider range of supply arrangements that:

- are targeted more closely to specific consumer profiles and risk appetites
- facilitate more confident decision-making around DER and DR investments
- allow retailers to develop targeted products that better enable them to manage their wholesale price and volume risks
- improve energy usage for New Zealand as a whole by speeding up the process of transition to a national smart and decarbonised electricity system

Future Interest
Response to Q26. Having contributed to the development and testing of the EIEP13 standards and a keen advocate for retail competition, I would be interested in contributing to the design and development of any new interchange standards in whatever capacity is appropriate.

Regards

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