

13 October 2024

The Electricity Authority

(by email to policyconsult@ea.govt.nz)

We appreciate the opportunity to respond to the “Omnibus four consultation - Improving consumer access to their electricity information”.

According to the Electricity Market Information website (EMI), Cortexo is the largest 3rd party requester of consumption data using the process outlined in section 11.32 of the Electricity Participation Code (Code).

Before we respond to the questions raised in the Code change omnibus we want to make some general observations about consumer access to electricity information.

The wider problem

The New Zealand electricity ecosystem is a multi (60+?) billion dollar operation and yet we settle our market systems by exchanging ‘flat’ CSV files via secure FTP (1970’s technology). We notify industry participants of Grid Emergencies by telephone or PDF’s linked from emails. And we make some, and often not the best, data available for consumer innovation in days, not milliseconds. The New Zealand electricity ecosystem needs to ‘digitalise’ if we want a highly productive, efficient, electrified zero-carbon future.

To steal from the UK’s BEIS, Innovate UK and Ofgem’s “Digitalising our energy system for net zero Strategy and Action Plan 2021” (JUL 21);

Data is an asset. It is information that has been translated into a form that is efficient for movement or processing.

Digitalisation is the transformation of a business or industry by using digital technologies to improve its processes.

A digitalised energy system is one where:

- *Presumption of data openness is the industry default;*
- *Data is adequate, standardised, and interoperable across the sector;*
- *The required infrastructure, processes, technologies and skills are appropriately deployed;*

- *The relevant rules and regulations, costs and benefits, and roles and responsibilities are clear.*

In our opinion this consultation, which we appreciate is intended to improve an existing process, is just fiddling at the margins. There needs to be a total technology revamp utilising modern data exchange technologies and integrating all locations where data is held. The Electricity Authority (Authority), should clearly flag a timeframe for this.

A major issue with requesting data from a retailer is their need to only present the data they use for provision of services to the customer; so although half hourly data is collected at the meter only monthly data is available from some retailers. A modern API base data exchange incorporating the retailer (for custom and requester validation) and metering company (for the actual data collected from the customer) is a necessary improvement in the process

Another failing of the current process is that tariff rates for the specific connection are not included with the consumption data supplied. Consumption data is of little value if it can't be mapped to retail and network tariffs. We automate the processing of thousands of ICPs worth of consumption data but cannot easily price that data on the specific tariff charged by the retailer and network. Generally available tariff data is of little use. The only way to price the consumption data is for each customer to send us their paper bill every month and have us process it manually. That is impractical.

The solution is to update the EIEP14 format to allow for specific ICP pricing, both retail and network to be provided, and when an EIEP13C requests file is sent a 'flag' is set against each ICP if pricing data is required. The EIEP14 format should be mandatory.

More specific issues with the Code section 11.32

There are inefficiencies that are not covered in this Omnibus but would be easy to address. The most important is data quality.

In our experience that can be backed up with relevant statistics, we would only receive valid data for approximately 80% of requests in the relevant timeframe (5 working days). Normally where we have not received any data from a retailer by day 3 of the request period, out of courtesy we would follow up with an email to our contact point at that retailer. Where a retailer still fails to deliver the data and has made no attempt to communicate with us we will take action with the Authority using the Code breach process.

The majority of data that is overdue is because of errors in the file received. If the file fails our automated validation process, which compares the data received to the mandatory EIEP13A format specification, then it cannot be processed by our software and will be rejected.

Data file errors are manually collated and emailed to each retailer for resubmission. This is an incredibly costly activity caused purely by a lack of machine-to-machine communications. This would not happen if:

- All EIEP files were validated against the mandatory specification at the Registry before being delivered to the recipient.
- the process was truly machine-to-machine which would mean no human intervention (removing data format errors) and allowing the response to be near real time. The only delay should be because of processing and transmission times, not because of human intervention.

We have discovered that customer data rules in the Code do not apply to all participants, this appears to be an oversight, but some second tier retailers or brokers, although falling into the definition of 'participant' in the Code do not have the same obligations as tier one retailers and for example do not have to use the automated registry information system to exchange data which means that requests and responses must be processed 'manually' via emailed EIEP files. This is inefficient, creates delays and effectively breaks any sense of an automated machine-to-machine process.

Finally, it would be efficient if every data holder was required to provide a 'generic' business email address for data related issues. Most do but a lot don't which makes notifications, follow up requests and requesting corrected files difficult.

The following pages provide our specific responses to the consultation questions. If there are any further questions or requirements please don't hesitate to contact us.

Regards,

Terry Paddy
Managing Director

Code amendment omnibus #4 – Submission form

Submitter / Organisation	Cortexo Limited
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Feedback on the omnibus format

Questions	Comments
<p>Q1.1. Do you have any comments on the omnibus format or suggestions to improve the omnibus format?</p> <p>Please explain your answer</p>	<p>No.</p>

Improving consumer access to their electricity information

Questions	Comments
<p>Q2.1. Do you support the Authority's proposal to amend clause 11.32B(1) of the Code to reduce the time a retailer must respond to most requests for consumer electricity information?</p> <p>Please explain your answer</p>	<p>No.</p> <p>The exchange of data should be fully digitised and occur in milliseconds, this will require machine-to-machine communications and remove data quality issues. Any greater time period is a delay (or threat) to productivity and innovation.</p> <p>We would accept the reduction to one day (24 hrs from time of receipt) for all valid data. We do not agree with the 70% and 90% milestones as they will require us to specifically monitor for those performance targets. The Authorities monitoring at the registry messaging hub is not accurate and does not take into account the significant number of files that are sent with errors that need to be requested again.</p> <p>In our opinion, the Authority should reduce the time period for response from 5 working days to 100% in 24 hours and clearly signal to industry that this will be moved to near real-time by 1 Apr 2026.</p> <p>We note that the AEMO in Australia is currently consulting on a "National Electricity Amendment (Realtime data for consumers) Rule". New Zealand's electricity system needs to digitalise and catch up</p>

	<p>instead of continually kicking the can down the road. The provision of near real-time data is just another cost of doing business and has significant benefits to NZ Inc.</p>
<p>Q2.2. Do you support the Authority's proposal to amend clause 11.32B(3) of the Code to increase the number of responses a retailer must provide in the next 12-month period without charge, from 4 to 12, thereafter all responses are free of charge?</p> <p>Please explain your answer</p>	<p>Yes</p>
<p>Q2.3. Do you support the Authority's proposal to amend the Code to clarify that a retailer must provide information under clause 11.32A about the injection of electricity into a network and raw meter data?</p> <p>Please explain your answer</p>	<p>Yes</p>
<p>Q2.4. Do you agree the proposals preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010</p>	<p>The proposals are acceptable as a stepping stone to the alternative proposal outlined in 2.33 of the consultation. The Authority should, in final determination, flag a timeframe to fully automated near real time data exchange. We would suggest by 1 April 2026.</p> <p>As electricity delivery gets more complex with more services and more use of consumer resources the need for near instantaneous data to, not only grow innovation, but inform and protect the consumer has much greater importance. With no commercial imperative, those who will need to provide the data will not easily volunteer to participate in the process, it must be by regulation. Investment in real time data provision systems should be the same priority as, say, retail billing systems.</p>

<p>Q2.5. Do you agree with the analysis presented in this Regulatory Statement? If not, why not?</p>	<p>Yes.</p>
<p>Q2.6. Do you have any comments on the drafting of the proposed amendment?</p>	<p>In summary, we request the following key points are reflected in the proposed amendment (including the procedures document) ;</p> <ol style="list-style-type: none"> 1. Timeframe for delivery is 24 hours 2. Data must meet the formats published by the Authority and errors are a breach of the Code 3. All participants must be able to exchange data via the registry messaging system 4. Every participant must have a generic email address for data related contact.