

## Code amendment omnibus #4 – Submission form

Submissions due 5.00pm Tuesday **15 October 2024**, to [policyconsult@ea.govt.nz](mailto:policyconsult@ea.govt.nz) with “Code omnibus #4 consultation” in the subject line.

Submitter / Organisation	FLICK ELECTRIC 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>The Authority may consider the omnibus format an effective way to request feedback on a (large) number of proposals at the same time based on relatively less comprehensive analysis. The Authority is effectively currently consulting on 21 different Code amendments. In order to provide feedback industry participants have to review the whole document to understand if one or more of the proposals are relevant to it. This is time consuming.</p> <p>Flick suggests the Authority should issue a consultation paper for each topic - the paper might only be 4-5 pages. This will make transparent the topic and quantity of requests for feedback the Authority is issuing at any one time.</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>Flick’s customers can access their own consumption data via their access to Flick’s dashboard.</p> <p>We note MBIE’s discussion <a href="#">paper</a> on “<i>Exploring a consumer data right for the electricity sector</i>” envisages “The provision of data immediately upon request” <sup>1</sup>.</p> <p>In Flick’s view improving consumer access to their electricity information requires a step change in how data is collected and access provided.</p> <p>Flick has previously submitted that it supports:</p> <p>“development of a modern system of data exchange to facilitate quality data flows without Privacy Act implications. This could be a central metering repository, APIs etc storing half hour data. The arrangements would reflect that the consumer owns their data provision and collection and data is not locked up behind a particular MEP (who is only performing the function of meter reading to collect data) or a retailer. The aim is to minimise duplication</p>

<sup>1</sup> Paragraph 33a.

	<p>and ensure the right level of access for different parties.”</p> <p>Flick acknowledges that creating a central metering information repository would be a complex project that would take some time to implement but are disappointed it has been dismissed on this basis.</p> <p>The current proposal is another tweak and other Code changes are likely to be required down the track. A commitment now to modernising data collection and access using technology-based solutions would have multiple benefits.</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>See answer to Q2.1</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>A Flick customer can see both its consumption and export via the same dashboard.</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>See answer to Q2.1</p>
<p>Q2.5. Do you agree with the analysis presented in this Regulatory Statement? If not, why not?</p>	

Q2.6. Do you have any comments on the drafting of the proposed amendment?	See answer to Q2.1
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## Clearing manager to settle FPVV hedges

Questions	Comments
<p>Q4.1. Do you support the Authority's proposal to include a new hedge settlement agreement form for fixed price variable volume (FPVV) hedges to be settled by the clearing manager?</p> <p>Please explain your answer</p>	<p>Flick strongly supports this proposal. The ability to settle a hedge settlement agreement (HSA) for a FPVV hedge with the Clearing Manager will improve wholesale market conditions for independent retailers, as it:</p> <ul style="list-style-type: none"> <li>• allows the buyer to use the offtake volume as a prudential offset, thereby reducing risk and potentially volatile and onerous prudential requirements for typically cash-constrained businesses</li> <li>• reduces administration and paperwork for both parties involved in such agreements thereby improving productivity.</li> </ul> <p>Implementing this Code change should be given priority with an immediate effective date.</p>
<p>Q4.2 Do you agree the proposed amendment is 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>Yes, this option is preferred.</p>
<p>Q4.3. Do you agree with the analysis presented in this Regulatory Statement? If not, why not?</p>	<p>Yes</p>
<p>Q4.4. Do you have any comments on the drafting of the proposed amendment?</p>	<p>No comment.</p>