



PO Box 106165,
Auckland 1143, New Zealand
NZBN 9429041132524 | GST 113618701

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Retail Data Team
Electricity Authority
Wellington

By email: retaildata@ea.govt.nz

Electric Kiwi supports more efficient data collection without duplication

Electric Kiwi welcomes the Electricity Authority's (the Authority) decision to consolidate reporting requirements, making the process more efficient for retailers.

While we support the Authority's objective to improve the efficiency of their data collection from retailers so they can make better informed decisions, we do not believe that the proposal laid out in this consultation meets this objective. Specifically, the wide expansion of the data requested from retailers would lead to such a vast data set, some of which is duplicated and some of which is commercially and personally sensitive, that it would be costly to collect, host, analyse and protect. As such, we don't believe the Authority has correctly assessed the cost involved and therefore should reconsider the inclusion of such data.

Duplicated data

Retailers currently report ICP information via the Registry. As the Registry information is used for several purposes, is embedded in the Code requirements, and is audited, we believe that the provision of the same information in a new format via a new transfer method is a duplication with no benefit to consumers. The system and resource changes required to reformat and provide this vast dataset for submission in another portal will be an additional, potentially large, cost to retailers which would likely be passed to consumers.

As the Authority owns the Registry and the data is audited, we believe this is sufficient for the Authority's requirements. Whilst we understand and agree with the objective of standardising and consolidating data, in this instance, due to the compliance nature and other uses of the data in the Registry, we do not believe this is an efficient or effective course of action.

The Ministry of Business, Innovation and Employment (MBIE) also collects pricing data in their Quarterly Survey of Domestic Electricity Prices (QSDEP)¹. It is unclear how the

¹ <https://www.mbie.govt.nz/building-and-energy/energy-and-natural-resources/energy-statistics-and-modelling/energy-statistics/energy-prices/electricity-cost-and-price-monitoring>

Authority intends to collaborate with MBIE to use this data rather than duplicate efforts in a new format and submission process.

Sensitive data and data security

We don't believe the Authority has provided sufficient rationale as to why it requires the billing and consumption data, per trading period, for every ICP in the nation. The Authority's own cost / benefit analysis does not mention the cost of the infrastructure that would be needed to host such a large dataset, nor is there a precedent to request individualised billing data.

Within the ICP and customer information in the amended request, is also the individualised MDC status which is sensitive customer data. Without appropriate assurance that this information could be transferred, hosted, and deleted securely, retailers would not be complying with privacy and data requirements.

The Authority has not disclosed a reason to collect revenue data on a per customer, per bill basis and as this data is commercially sensitive, we do not think this information is a reasonable request. The Authority also requests revenue data for products it does not regulate (telco) which we feel is unnecessary.

Given the size and frequency of the data request, can the Authority estimate the costs that may be passed on to industry participants via the levy or other means, and can the Authority provide assurance on the cybersecurity measures they'll be implementing to receive, retain and remove such massive amounts of data?

Q1 - Aggregated data as a solution to improve cost and workability

In our previous submission regarding Hedge Disclosures and Market Monitoring², the Independent Retailers set out some thoughts about transparency and data use which we feel also apply to this amended data request. The principal observations from the Authority that data collection and use could be more efficient and used more effectively for consumer benefit, we agree with. We do not, however, agree with the scope of the current amended request.

The majority of this data could be aggregated to provide information for the Authority to make data-based decisions without risk to commercially or personally sensitive data. [Appendix 1](#) lays out a draft example of what that request may look like, using the Authority's amended tables as a base.

We would advise the Authority to look at the Commerce Commission's Annual Monitoring data request for the telco industry. This information provides a great deal of data and for

² https://www.ea.govt.nz/documents/3781/Independent_Retailers.pdf

robust decision-making by the regulator without requiring individualised consumer information.

We appreciate the Authority needs to collate large amounts of data for several purposes at various frequencies and we do not object to providing data on an aggregated basis at a monthly frequency while maintaining some annual and quarterly compliance reporting such as the Stress Testing. We object to the duplication and scope of the amended request and recommend the Authority consider the legal basis and rationale prior to making a final decision.

Yours sincerely



Huia Burt
Chief Executive



Appendix 1: Suggested aggregated information request

Information available in the Registry is not duplicated here, nor is information submitted as part of Quarterly Stress Testing / Hedge Disclosure requirements or MBIE's QSDEP.

Header columns	Information required
<i>General billing table</i>	
Retailer	
Brand	
ICPs	Count of ICPs the retail brand provides services to
Business account	Count Residential and Small Business customers
Billing frequency options	W - weekly F - fortnightly M - monthly Q - quarterly O - other frequency inc ability to pre-pay / instant pay
Billing frequency count	Count of customers on each option (as at the last day of the reporting period if customers swapped within the month)
Customers on Payment Plans	Count of customers on Payment Plans
Prepay	0 no, 1 yes
MDC	0 no, 1 yes
Bundled plan with telco or other services	0 no, 1 yes
Gas	0 no, 1 yes
LPG	0 no, 1 yes
Other services	List of other services provided
Incentive	0 no, 1 yes for anything received not inc in discounts (appliances, subscriptions etc)
Net import lines charges	total lines charges paid this month
Net export lines charges	as above for export
<i>Plan information</i>	

Retailer	
Brand	
Product offering name	each plan as separate column with following info for each
Fixed term	0 no, 1 yes
Currently available [to new customers]	0 no, 1 yes
Discounts available	0 no, 1 yes
Rate name	peak, off peak etc
Rate	rate amount for each rate
Unit of measurement	kWh
Spot price	0 no, 1 yes
Load control	N - none D - distributor R - retailer T - third-party DR - distributor can also control
Time of Use	0 no, 1 yes
Time of Day	range of hours between which the rate applies
Weekend	0 no, 1 yes
Weekday	0 no, 1 yes
<i>Retailer aggregated Q's</i>	
1. load control & flexibility	Annual monitoring
Retailer name	
Brand	
Type	List of types available e.g EV
Agreements	Count of agreements in place with flex providers
Purpose	C- Avoid congestion R- Add reserve O- Manage outages W- avoid high wholesale prices D- avoid distribution peak prices
Total capacity inc unit of capacity	

Actual amount inc units used	Actual amount of load controlled used
Q's 2 - 9 use same format	
Retailer name	
Brand	
Month	
Question #	
Business	0 Resi, 1 SME
Response	numerical answer to each Q
Unit	\$, kWh...
Q's 2 - 10	
Q2a debt / arrears	Total amount of debt written off in the period
2b	Total debt passed to debt collection
2c is the debt passed to collections counted in the total written off amount reported above?	0 no, 1 yes
Q3 credit checks	Count of residential customers declined due to failed credit check
	Count of SME customers declined due to failed credit check
Q4a bonds	Count of customers charged a bond
4b	Average value of bonds charged
Q5a complaints	Total number of complaints
5b	Count of complaints relating to declined or reconfirmation of MDC
5c	Count of complaints related to disconnection
5d	Count of disconnection complaints related to MDC ICPs
5e	Count of complaints relating to disputed charges for power
5f	Count of disputed charges complaints related to MDC ICPs
Q6 MDC	Total MDC ICPs
Q7a MDC applications	Count of MDC applications requested by retailer
7b	Count of MDC applications, in any form, received by retailer

7c	Count of applications declined after medical professional evidence requested and not received
7d	Count of applications declined as consumer doesn't agree to retailer holding sensitive medical information
7e	Count of applications declined as consumer is non responsive to queries from retailer
7f	Count of applications declined as consumer is not a permanent or temporary resident at the customer premises
Q8a MDC status review	Count of MDC status reviewed
8b	Count of MDC status reviewed and no longer MDC after review
Q9a MDC disconnection	Count of MDC ICPs disconnected for nonpayment
9b	Count of MDC ICPs disconnected for any other reason than nonpayment
9c	Count of MDC ICPs reconnected due to retailer being notified that the disconnection impacted an MDC at premises
Q10a fees	Count of customers with prompt payment discounts applied
10b	Count of customers with late payment penalties applied
10c	Count of customers with disconnection fees applied
10d	Count of customers with reconnection fees applied
10e	Count of customers with other fees applied (call out, metering etc)
10f	Count of customers on Low User tariff