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The Electricity Authority – Te Mana Hiko

By email: ccc@ea.govt.nz

Proposed Electricity Information Exchange Protocol – EIEP4A: Medically Dependent Consumer Information

Aurora Energy welcomes the opportunity to submit feedback on the Electricity Authority – Te Mana Hiko (the Authority) *Proposed Electricity Information Exchange Protocol – EIEP4A: Medically Dependent Consumer Information* consultation paper (Consultation Paper).

Aurora Energy is an electricity distribution business (EDB), serving more than 97,000 homes and businesses in Dunedin, Central Otago and Queenstown Lakes.

We support the introduction of a mandatory Electricity Information Exchange Protocol (EIEP) to ensure information received from retailers regarding medically dependent consumers is consistent, reliable and up to date. However, we note that there will be practical issues for us if the EIEP4A information is limited to ICP level only, as proposed. We have suggested an alternative where this is the case, which we consider still allows for protection of the customer's personal information.

Please refer to the table in Appendix A, which contains our responses to the Authority's questions posed within the Consultation Paper, in the format requested.

We do not consider any part of our submission to be confidential.

Yours sincerely

A handwritten signature in blue ink, appearing to read "S Inder", is positioned above the printed name.

Sarah Inder

Regulatory Assurance Manager

Appendix A Aurora Energy Consultation Paper responses

Question	Aurora Energy's response
Q1. Do you agree that introducing a regulated EIEP4A will address the issues with EIEP4 described above in 2.6?	We agree that introducing a regulated/mandatory EIEP will address the issues we currently have with the information received from (some not all) retailers through EIEP4, as retailers will be required to provide complete information, in a standard format, and update it more frequently.
Q2. If you are a retailer or distributor, does limiting the data provided in the proposed EIEP4A to only medically dependant status at the ICP level meet your operational needs? If not, what additional data would you suggest?	As a courtesy, we contact (either by telephone or email) medically dependant consumers ahead of any planned power outages. We would want to ensure that we could integrate EIEP4A data with existing customer data we hold (if any) and that we have some way to obtain new medically dependant customers' contact details so that the information remains reliable, in order to meet our operational needs.
Q3. Should the use of the EIEP transfer hub be mandatory?	Yes, for consistency and the security of information.
Q4. Do you agree with the objective of the proposed form? If not, why not?	Yes, in part. We appreciate the intention to limit the personal information provided for privacy reasons, but as we contact medically dependant customers about planned outages, we would need to ensure that we can integrate the EIEP4A information with any existing customer contact information that we receive via EIEP4 and to have some way to obtain new medically dependant customers' contact details. We suggest that customers are given the option to provide contact details only (telephone number and/or email address) if they wish to be contacted about planned outages in advance. This could be part of the application for medically dependent consumer status made to retailers. Customers could then be directed to the distributor's Privacy Statement for information as to how that information will be used. EIEP4A would then need fields to record those contact details if the customer has consented to contact information being provided for this purpose.
Q5. Have we identified all the main costs and benefits? If not, what are we missing?	We agree with the benefits identified. In relation to costs, we agree the main costs relate to the initial setup and compliance costs to update systems (including integration) and processes. The increased frequency of information may result in the need for additional resources.

Question	Aurora Energy's response
Q6. Do you agree the benefits of the proposed amendment outweigh its costs?	We agree that the efficiency gains are in the long-term interests of consumers, and therefore the benefits of the proposed amendment outweigh its costs.
Q7. Does the proposal adequately address privacy concerns? If not, what additional safeguards should be included?	As noted in our response to Q4 above, we appreciate the intention to limit the personal information provided to ICP level for privacy reasons but note this may impact on the service we currently provide. That is, to contact medically dependant customers about planned outages. We question whether this safeguard is necessary, given that there are protections of personal information under the Privacy Act (e.g. that information is used only for the purpose for which it is collected) and that more detailed information is already being received under EIEP4.
Q8. Do you foresee any practical or technical challenges with implementing ICP-only data exchanges? If so, what mitigations would you propose?	<p>We refer to our responses to Q2, Q4, Q5 and Q7 above. It depends on our ability to integrate information and systems, and to have the means to obtain new medically dependant customers contact information.</p> <p>Additional resources may be required for the initial set up and ongoing increased frequency of information exchanges.</p> <p>Practically, a transition period for implementation (e.g. 6 months) would be beneficial.</p>
Q9. 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.	We agree a regulated/mandatory EIEP is the preferred option to ensure consistency and reliability of information.