



## **Submission by WEL Networks Limited on Discussion document “Options for establishing a consumer data right in New Zealand”**

### **INTRODUCTION**

WEL Networks Limited (“WEL”) is an electricity distributor operating under the Electricity Act 1992. WEL owns, operates and develops electricity distribution infrastructure in the Waikato region to provide line function services to over 95,000 installation connection points. Infrastructure such as substations, switching stations and transformers enable WEL to convert electricity from a higher voltage (taken from the national grid) to a useable voltage for consumers to access, and to provide an enhanced level of security of supply through built-in redundancy in the distribution network.

As a network utility operator under the Resource Management Act 1991 (“RMA”), WEL has the responsibility of providing a secure and efficient supply of electricity to the community within WEL’s distribution network area.

WEL is a requiring authority under the RMA and also classified as a lifeline utility under the Civil Defence Emergency Management Act 2002.

Within its distribution network area, WEL has an online electricity retailer which is operated through subsidiary company, OurPower Limited, and also has technology investments (smart meters) which have proven to be of great benefit by reducing capital investment due to a more detailed understanding of network loadings. WEL uses its smart meters to offer metering services to electricity retailers as a metering equipment provider.

### **WEL’S SUBMISSION ON OPTIONS**

WEL has chosen to limit its submission on ‘the options’ as these relate the electricity sector, rather than a broader economy-wide view. As acknowledged in the Discussion Document, data portability already exists within the electricity sector for consumption and related data, and the industry (led by the Electricity Authority) continues to create opportunities for innovative products or services and improve processes around consumer access to data. As an example, a request can be made for the last 24 months of a consumer’s consumption data and the electricity retailer must deliver the most granular data it has used for the consumer.

Of the four options presented:

- WEL’s preferred option is Option 1 – Status Quo. For the electricity sector, which has embedded data portability, it will continue to rely on the existing protections and industry-led solutions.





- WEL's least preferred option is Option 3 – An economy-wide consumer data right. For the electricity sector, the blanket application of high level 'one-size-fits-all' principles risks losing the gains already made within the industry and may be difficult to implement.

