

Submission on discussion document: *Unlocking value from our customer data*

Your name and organisation

Name	Privacy of natural persons
Organisation (if applicable)	Flick Electric Limited
Contact details	Privacy of natural persons

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Responses to discussion document questions

Other comments

Flick is an electricity retailer and adheres to the Electricity Industry Participation Code in relation to sharing the customer data we hold. These rules were developed after extensive consultation and, we suggest, are addressing the problem definition and objectives identified at the start of that consultative process.

Our understanding is that the legislation will be an overarching framework for data sharing but the subsequent Regulations for each sector will provide the detail. Flick requests MBIE undertake comprehensive engagement when a decision is made to make Regulations relating to electricity retailing, so that:

- the Regulations are at least as effective as the current Code
- lessons learnt since the Code has been in place can be used to ensure quality Regulations
- the Regulations and Code are complimentary (and not in conflict) or the Regulations replace the Code, and
- sufficient time is allowed for consulting and finalising the Regulations.

Flick supports a centralised data depository for customer information as this would simplify a number of current processes. Development of the Regulations could include investigating the benefits and costs of such a structure.

Flick looks forward to engaging in this process with MBIE.