

## Responses to questions

The Energy Use Policy team welcomes your feedback on as many sections as you wish to respond to; please note you do not need to answer every question.

Status quo and problem definition	
1.	<p>What are your experiences of accessing consumer and product data for electricity under the status quo?</p> <p>The current industry protocol is clunky for the consumer. Most customers have smart meters that collect the half hour data however if a retailer doesn't use/store the half hour data the customer doesn't have access to it.</p>
2.	<p>Do you agree with our summation of the status quo and problem definition? Is anything missing or incorrect in your view? And please provide any evidence you may have to support your views.</p> <p>Yes, we agree with the problem definition.</p>
3.	<p>Do you think that regulatory options are necessary to unlock better access to customer and product data?</p> <p>Yes, CDR will require a Government directive to enable it. In theory the Electricity Authority could have already implemented a more effective information exchange mechanism however it has not been prioritised to date. A timeframe for implementation will ensure this occurs, additionally consistency in the accreditation approach across sectors where it is practical to do so makes sense.</p>
4.	<p>What do you consider to be the likely outcomes for access to customer and product data in the absence of a CDR for electricity?</p> <p>History suggests it's unlikely a solution will be implemented in a timely fashion without it.</p>
What a consumer data right for electricity could look like	
5.	<p>Who else may be impacted by a designation of the electricity sector? Should particular groups or classes of entities be explicitly included or excluded from a potential designation?</p> <p>The categories look comprehensive.</p>

6.	<p>What customer data do you think is the most important? And what else (now or in the future) would be important? And why? What are the benefits from consumers having ready access to this data?</p>
	<p>The half hour usage data is critical. New Zealand has very high levels of smart meter penetration so this data is collected for 95%+ of consumers. One of the problems with the current industry arrangements is that some retailers are only storing a monthly consumption value and this is all that can be accessed by the customer. Wherever a smart meter is collecting the half hour data this should be accessible.</p> <p>This data is critical for determining the appropriate pricing plan, and evaluate choices such as whether solar and battery make sense.</p>
7.	<p>If access to customer data is designated for all consumers (residential, small business, large business and large consumers) what are the potential benefits, risks or costs associated with each type of customer? And why?</p>
	<p>This is desirable and for usage data this should be straightforward. The pricing data will likely be more complex.</p>
8.	<p>What product data do you think is the most important? And what else (now or in the future) could be important? And why? What are the benefits from this data?</p>
	<p>Pricing plans and any associated financial incentives and discounts, although this information is less of a priority than the usage information. There are already organisations collecting the product data so if you want to take an iterative approach and get something off the ground quickly focus on making the usage data available.</p>
9.	<p>Are there any other issues with product data we should be aware of? And why? Please provide examples.</p>
	<p>In time there will be more device automation options that become available. These may be reward with different financial incentives e.g Intelligent Octopus NZ, we provide a \$10 rebate per month but this could also be disaggregated usage charged at a different rate. The data used in this might be device data rather than metering data.</p>
10.	<p>What factors should be considered when identifying who the best data holder is under a potential CDR regime? And how might contracting agreements affect the application of a CDR in regard to data holders? (e.g., contracts between metering equipment providers and retailers to share data).</p>
	<p>In theory retailers but I think some will drag their feet and given there are many retailers, and some aren't managing the half hour data, it may be quicker and less cost to access this usage data from the MEP directly (most data is held by a couple of MEP's).</p> <p>Regulation allows you to untangle contracting arrangements if indeed there are limitations in contract.</p>
11.	<p>Do you agree with our initial framework for how to identify/designate data holders? Why or why not?</p>

12.	What actions could be designated for electricity under a CDR? And why? What are the potential benefits from these? Please provide examples.
	Switching retailer, change of plan with an existing retailer.
<b>Potential benefits and risks</b>	
13.	What are your thoughts on the potential impacts of a designation on the interests of consumers? Are there any specific benefits that are likely to be enabled with designation? What is the likely scale of the benefits, and over what timeframe would they occur?
	<p>Designation will empower consumers by placing data ownership in their hands, giving them the ability to easily share their electricity usage and associated data with third-party providers. This will immediately increase transparency and foster more informed decision-making. The primary benefits include:</p> <p>Enhanced Consumer Autonomy: Consumers will gain direct access to their own data, allowing them to make more informed choices about energy plans, products, and services.</p> <p>Reduced Barriers to Switching: The CDR will streamline the process of switching energy providers, reducing friction and increasing consumer mobility. This is likely to lead to more competitive pricing and service offerings.</p> <p>Improved product development: Improved availability of usage data will allow innovative products to be developed to meet customer needs.</p> <p>Expected Scale and Timeframe: The benefits of increased transparency and easier switching will be realized quickly, within 1-2 years post-designation, as consumers begin to understand and exercise their rights under the CDR framework. The scale of impact is significant, potentially affecting all residential and commercial consumers.</p>
14.	Do you have any comments on the specific interests of different types of consumers, such as, residential, business, industrial, rural, Māori, or other groups of consumers?
	The scale of impact is significant, potentially affecting all residential and commercial consumers.
15.	What are your views on the nature and scale of costs/benefits? Who would these costs/benefits apply to and when?
	There will obviously be a technical implementation cost, this may drive choices around the design of API access arrangements.

	The benefits accrue to consumers presumably this will be \$M a year as it will help reduce search costs and allow more customers to switch to plans where they pay less than they currently do.
16.	Would you be able to quantify potential additional costs to your organisation associated with designation under the Bill?
17.	Do you have any comments on the benefits and risks to security, privacy, confidentiality, or other sensitivity or customer data and product data?
	This can be managed.
18.	Are there any risks from the designation to intellectual property rights in relation to customer data or product data?
	Possibly if it extended to automation and particular use cases. But the basic scenarios of half hour usage data should not be an issue.
<b>Other aspects of a potential designation</b>	
19.	What do you consider to be important if designing an accreditation regime for the sector?
	You've identified reasonable criteria. There may be valid reasons why a lesser standard is acceptable in electricity, in banking payments could potentially be authorised by the accredited party so the bar for accreditation will be quite high.
20.	What are your views on fees for requests for customer electricity data under the Bill? If fees are charged, what limits or restrictions should be placed on fees? Do you have any comments on the costs and benefits of the various options?
	Fees on end users could frustrate the use of this service. It may be appropriate to apportion some cost to accredited parties depending on the use case, data load and frequency of data call.
21.	Are there any particular considerations for electricity that should be taken into account for a consumer consenting process?

	The duration of consent should reflect the customers expectations. For example one off use of a switching site shouldn't give enduring consent. However a bill aggregation service by an energy broker may appropriately be given and enduring consent.
22.	Do you think that standards should be led by industry, by government or co-led? What is the role of industry in developing standards? And why?
	I think the Government should lead this with operational input from industry. The industry will not implement this in a timely fashion otherwise.
23.	How do you believe a CDR and the Code could/could not work together?
	The Code should be subordinate to the CDR. In time it can be amended to be consistent if there is a clash.
<b>General Comments:</b>	

## Thank you

We appreciate you sharing your thoughts with us. Please find all instructions for how to return this form to us on the first page.