

11 June 2019

Submissions
 Electricity Authority
 PO Box 10041
 WELLINGTON 6143
 By email: submissions@ea.govt.nz

POWERCO – Submission on *Quick Wins for Increasing Access to Electricity Services*

Thank you for the opportunity to submit on the Electricity Authority’s consultation paper issued on 23 April 2019.

We support the principle of streamlining the process – so long as there is clarity about the rights of and obligations on all parties up front

Powerco does not currently seek consumer consumption data via the ‘authorised agent’ mechanism in the Code. One of the reasons for this is that our network needs to provide a safe reliable service as consumers move - both physically and between retailers. So our data needs are great. We have contributed to and support the desire of industry to develop an approach that allows distributors to use consumption data to support efficient operation of our networks; it’s about how we do this, not if we should.

Our comments on the Authority’s three proposals are:

<p>Proposal 1: Information contained in a request</p> <p>Proposal 2: Establish an Agent Authorisation API</p>	<ul style="list-style-type: none"> • We support the proposed systematic approach to authorisation. Industry participants need clarity about the interaction between the Code and the Privacy Act. The EA’s Code amendments also need to align with the Office of the Privacy Commissioner. If a legal opinion is required, we suggest EA coordinate this on behalf of consumers as it’s inefficient to develop multiple legal opinions from multiple parties. This advice would also be available to future participants and data agents.
<p>Proposal 3: Increase data available via the existing API</p>	<ul style="list-style-type: none"> • Clarity about the EA’s position on the use of data could be useful. It’s not clear how this proposal makes it easier for consumers to share their consumption data with businesses they trust. The paper suggests that the ANZSIC code information would be “beneficial to retailers and agents so as to offer more tailored service offerings” (3.45). This appears to be a different view than communicated about the use of registry data¹.

¹ “The registry is not to be used for any non-Code related purpose, including as a source of data for direct marketing, cold calling or other marketing activities.” Source: <https://www.ea.govt.nz/dmsdocument/18502-memo-use-of-the-registry-for-non-code-purposes>

We appreciate the Authority's effort to arrange the industry discussion on May 27th and circulate the summary notes. A future option to consider is convene this sort of discussion within a 1-2 weeks of a consultation paper being released. This would maximise the chance to get parties aligned with the Authority's views and thinking, and the Authority to get some initial feedback prior to receiving formal submissions.

If you have any questions on this submission, or would like to discuss these issues further, please contact Andrew Kerr (Andrew.Kerr@powerco.co.nz).

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Stuart Marshall', with a stylized flourish at the end.

Stuart Marshall
General Manager – Regulation and Commercial