

Dr Stephen Jay
Direct: +64 4 590 6595
Email: Stephen.Jay@transpower.co.nz

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Electricity Authority
2 Hunter Street
PO Box 10041
Wellington 6143

By email: submissions@ea.govt.nz

Quick Wins for Increasing Access to Electricity Services

Thank you for the opportunity to submit to the Electricity Authority's consultation *Quick Wins for Increasing Access to Electricity Services*, published 23 April 2019.

We agree with the Authority that 'efficient sharing of data supports competition, reliability and efficiency across the supply chain. We expect the efficient sharing of data to lead to more participation in the electricity sector, greater innovation in products and services available to consumers, and to assist consumers to make more informed decisions'.¹

Transpower has been operating its demand response programme to investigate its scope as a viable transmission alternative. A core goal of the programme is to reduce barriers to entry so that more of the demand side can be involved. To support participants' meter data provision, Transpower has needed to act as an agent to collect meter data on their behalf.

We support the Authority's proposals for 'quick wins' to increase access to Electricity services for consumers. The quick wins will support innovation such as our Demand Response Programme and continue to reduce barriers to entry for consumers that want to participate. We consider other quick wins could also be advanced such as expanding the transfer hub to enable API (application programming interface) integrations.

We have responded to the Authority's specific questions about the proposals in the appendix to this submission.

Yours sincerely

Stephen Jay
General Manager Grid Development

¹ Consultation paper section 2.4

Appendix - Responses to Questions

Question	Response
<p>1. Do you agree with the Authority proposal to amend the Code to establish the contents required for an information request to be valid? If so why? If not, why not?</p>	<p>Agree.</p> <p>Transpower's Demand Response Programme has incurred barriers that exist with the current process of collecting metering data as a third-party agent.</p> <p>Requesting medium to large consumers to collect their metering data and provide data themselves was a barrier to entry for demand response programmes. Asking residential consumers to do this is even more of a barrier. So being a third-party agent to collect meter data on behalf of these consumers efficiently enables more innovation and applications like demand response to grow.</p> <p>The development of the EIEP13 process is an improvement but we agree that the authorisation process of those and similar requests be amended to the Code.</p>
<p>2. Do you agree with the Authority proposal to amend the Code to prohibit retailers from requiring additional information and from requiring the information to be provided in a format? If so why? If not, why not?</p>	<p>Agree.</p>
<p>3. Do you agree with the Authority proposal to amend the Code to establish timeframes for communicating a rejection or revocation of an authority? If so why? If not, why not?</p>	<p>Agree. The timeframes will mean information is delivered that supports understanding.</p>
<p>4. Do you agree with the Authority proposal to establish an Agent Authorisation API? If so why? If not, why not?</p>	<p>Agree. An Application Programming Interface PI for authorisation codes will reduce the current barriers found in the initial EIEP13C request.</p>
<p>5. Should use of proposed Agent Authorisation API be mandatory for both agents and retailers?</p>	<p>Agree. We consider standardising the approach for third-party authorisation supports efficient industry operation.</p>

Question	Response
6. Do you agree with the inclusion of the three additional registry fields into the ICP connection data API and My meter web portal? If not, why not?	We defer to industry participant response.
7. Do you consider that there are other fields that have not been identified that should be added to the ICP connection data API and My meter web portal? If so why?	We defer to industry participant response.
8. Do you agree that the proposals do not breach the obligations imposed by the Privacy Act of 1993? If not, why not?	We defer to industry participant response.
9. Do you agree with the costs and benefits of each of the proposals? If not, why not?	We defer to industry participant response.
10. Are there any other costs or benefits we have not identified?	We defer to industry participant response.
11. Do you have any comments on the drafting of the proposed amendment?	The number of 3 rd party requests is currently authorised to 4 times per year. Transpower proposes that this should be increased to 12 times per year so requests for monthly data can be made on behalf of consumers.