

# Submission Form

## 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>We require consumer energy data ideally monthly, but are having to request quarterly instead due to the unknown costs of requesting data monthly.</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>Agree, and support the proposal to increase the non-chargeable requests from 4 per year to 12 per year as this aligns more with billing cycles</p>
3.	<p>Do you think that regulatory options are necessary to unlock better access to customer and product data?</p> <p>Just increasing the request number from 4x to 12x per year would be enough, seems like the framework already exists, just change the numbers</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>A cluster of issues from the many different parties all complaining about the costs involved. Metering companies are not regulated (but should be), and will not play nicely since they have competitors. Without enforcing the data access through retailers, there are too many other potential players muddying the water.</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>

6.	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?
	For Empower Energy, the important figure for us is aggregated export/injection volume data, ie a single monthly kWh value. For others, Time Of Use (TOU) consumption/generation data would be important to sell other services, eg hot water, or EV charging, or V2G.
7.	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?
8.	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?
	Simple data is aggregated consumption and generation, TOU data will be the next level and most useful for innovative grid services
9.	Are there any other issues with product data we should be aware of? And why? Please provide examples.
	Quality of meter data isn't 100%, eg sometimes there are connectivity issues that delay the data incoming. Needs to be some allowance for this.
10.	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).
	MEPs should become regulated, but Retailers should be the holders responsible for supplying the data to the consumers and agents since they are the parties responsible for charging the consumers, so should have a handle on the data quality, and be able to have systems that can handle multiple MEPs over their customer base
11.	Do you agree with our initial framework for how to identify/designate data holders? Why or why not?

12.	What actions could be designated for electricity under a CDR? And why? What are the potential benefits from these? Please provide examples.
<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?
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?
15.	What are your views on the nature and scale of costs/benefits? Who would these costs/benefits apply to and when?
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?

	Agents or requestors should provide proof of their data integrity and security systems to ensure that data is safe with them after requesting.
18.	Are there any risks from the designation to intellectual property rights in relation to customer data or product data?
<b>Other aspects of a potential designation</b>	
19.	What do you consider to be important if designing an accreditation regime for the sector?
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?
	The consumer already pays for the data through metering fees, there should not be further fees. To become a participant there needs to be a system in place to automatically process the data requests
21.	Are there any particular considerations for electricity that should be taken into account for a consumer consenting process?
	A centralised system to indicate which consumer has given consent to which agent would be advantageous for the systems on both sides of the requesting process to access, eg Electricity Registry
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?
	Government led. Industry is too fragmented with differing incentives
23.	How do you believe a CDR and the Code could/could not work together?

### General Comments:

### 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.