

10 October 2024

Ministry of Business, Innovation and Employment

By email: energyuse@mbie.govt.nz

Exploring a consumer data right for the electricity sector

1. Vector welcomes the opportunity to submit on the Ministry of Business, Innovation and Employment's consultation document, "*Discussion paper – exploring a consumer data right for the electricity sector*" ("**Discussion Paper**").
2. We agree with the problem identified by the Discussion Paper – that consumers face challenges in accessing and controlling their data, which is crucial for making informed decisions in the electricity sector. Current data arrangements across the sector are fragmented and complex, making it typically difficult for consumers and industry participants to access and use consumer usage and product-related data.
3. Points raised in this submission are subject to consistency with existing data regimes, and that our ability to obtain information is not lessened under proposals in the Discussion Paper.
4. The Discussion Paper indicates that electricity retailers would likely be designated as data holders under the regime, meaning they would be required to provide customers and other accredited requestors access to data about a customer's electricity usage, and/or to provide data about their own products to accredited requestors, such as tariff or pricing plans.
5. We support the creation of a consumer data right so that customers might more easily obtain their usage data from their current electricity supplier and, for example, to enable them to use it with comparison services for price comparison and switching purposes.
6. Better access to consumer and product data could also bring other benefits to electricity consumers and the industry generally, by encouraging innovation and enhancing competition in the electricity sector, leading to better customer outcomes, which Vector supports.
7. In Vector's view, a primary purpose of a consumer data right should be to enable consumers to be able to better use their own data for their own benefit, and to that end, we support initiatives that will enable consumers to better engage with the electricity market by making relevant data more accessible.
8. While there are many holders of customer and product data in the electricity sector, Vector thinks it is appropriate that a limited set of data providers are designated under the proposed consumer data right regime. Given the purpose and intent of the regime we submit it is appropriate that designated "data holders" under the regime should be limited to electricity retailers and MEPs. This is because, in our submission, retailers and MEPs hold the majority of consumer and product data that consumers and accredited requestors would likely want to access.
9. We submit that EDBs should not be designated as data holders under the regime. Doing so would impose significant compliance costs on industry participants who may have no direct relationship with consumers, without necessarily generating any associated consumer benefit, given the nature of data held by those parties.
10. Vector also finds access to retailer tariff information and some operational data challenging. The possibility of gaining better access to this type of data as an accredited requestor under

the scheme and being able to leverage standardised processes for data access could, in our view, lead to better industry outcomes by improving efficiencies, enhancing network operations and facilitating more effective planning for future infrastructure investment.

11. Vector is available to work with officials or answer any questions on matters in this submission.

Yours sincerely



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