

11 June 2019

Electricity Authority

Wellington

by email: submissions@ea.govt.nz

SUBMISSION ON QUICK WINS FOR INCREASING ACCESS TO ELECTRICITY SERVICES

Introduction

- 1 Orion New Zealand Limited (**Orion**) welcomes the opportunity to comment on the “Quick wins for increasing access to electricity services” consultation paper (the **paper**) released by the Authority in April 2019.
- 2 We are generally supportive of the proposals.
- 3 We have some comments on proposal 3 and the inclusion of “address_property_name” in the data returned by the ICP connection data API:
 - 3.1 Unlike the other two data elements in proposal 3 (ANSZIC code and switch status) address_property_name is initially populated and maintained – if it is populated and maintained at all - by distributors. While we have no objection to this being included in the data returned by the API, analysis of our own data in this field suggests it is not routinely maintained and it is generally set up when the connection is established for very distributor-centric purposes. It might be useful if the Authority set out the sorts of problems this data is intended to solve in switching as distributors might be able to populate more useful information and / or set up processes by which it is reviewed from time to time.
 - 3.2 While the information is indeed already available to Registry users, inclusion of it in the data returned by the API does seem to us to make it more public. Based on analysis of our data there are some names of natural persons in this field. These persons might or might not be associated with the ICP anymore, but in any case we suggest that distributors be encouraged to delete such information before the API changes come into effect.
 - 3.3 Even where the names are not names of natural persons, distributors, or at least Orion, do not maintain this information, so it may well refer to businesses that are no longer at an ICP / address. This could create confusion rather than help. Again, distributors might be invited to cleanse this data prior to the API changes coming into effect. As an example of this, we looked at the single address that has the most (25) ICPs associated with it, and analysed the address_property_name field for these. All were business names, and a good half were no longer correct.
- 4 As an appendix we include some analysis of the address_property_name field for Orion ICPs.

Concluding remarks

- 5 Thank you for the opportunity to make this submission. Orion does not consider that any part of this submission is confidential. If you have any questions please contact Bruce Rogers (Pricing Manager), DDI 03 363 9870, email bruce.rogers@oriongroup.co.nz.

Yours sincerely



Bruce Rogers
Pricing Manager

Appendix: Analysis of address_property_name field for Orion ICPs

NB: data analysed early May 2019.

1: Count of ICPs by property description type

Property description type	Examples	ICPs
Blank field		156,871
End use	Domestic, commerical, bakery, supermarket	15,781
Lot number		7,423
ICP number		2,784
Customer name		2,649
Farming related	Farm supply, irrigation, woolshed, shearers quarters	2,264
Location details	Front, rear, 1st floor, block A, Arkadia Villas	1,801
Building type	House, bach, garage, school, church	1,628
Asset specific	Lighting, cell site, pump, sign	1,360
Temp supply		1,233
GPS Coordinates		400
Physical address	street address or street number range	100
DUML ICP		30
Other		50
Uncategorised		10,688
Total		205,062

2: Analysis of number of ICPs that share identical addresses (identical other than address_property_name)

ICP count range at address	Number in range
2	4895
3 to 5	1217
6 to 10	86
11 to 15	3
15 to 20	2
20 to 25	2
	6205