



24 July 2023

Consumer Data Right Project Team  
Commerce, Consumers and Communications  
Ministry of Business, Innovation & Employment  
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By email: [consumerdataright@mbie.govt.nz](mailto:consumerdataright@mbie.govt.nz)

### **Submission on Unlocking value from our customer data**

1. Thank you for giving Orion the opportunity to make a submission on the Discussion Document *"Unlocking value from our customer data"* and the draft Customer and Product Data Bill.
2. We have provided our comments on many of the discussion questions in the attached submission, but we also wanted to provide some more information about Orion New Zealand Limited (Orion), and the regulatory environment that we operate in, to put our submission in context.
3. Orion is the electricity distribution business serving mid-Canterbury and we are owned by the Christchurch City Council and Selwyn District Council. Electricity distribution, being a natural monopoly, is a regulated service under Part 4 of the Commerce Act 1986, and we are also a participant in the New Zealand electricity market and subject to market regulation by the Electricity Authority. This regulation governs much of what we do.
4. At Orion, our purpose is powering a cleaner and brighter future with our community. We want to drive prosperity for our region through balancing energy affordability, energy security and sustainability. We have five focus areas for achieving our purpose including
  - facilitating decarbonisation and hosting capacity at lowest cost while giving our customers choice on how they access our network, and
  - being a force for good in the community we serve, enabling the net zero transition.
5. Standing still in a changing world is not an option for us. We welcome the chance to innovate and seek out ways to support Central Canterbury's rapid growth, deliver on our commitment to confronting the climate emergency and respond to our customers' increasing desire for control over their energy choices.
6. Receiving, storing and protecting customer data is a very important part of our business. In particular, we receive some data from our customers directly, while a large proportion of data is collected by electricity retailers and metering providers and shared with us pursuant to the electricity industry regulatory regime. Customer data received from electricity retailers enables us to calculate our

network charges (which are then invoiced to retailers, who then invoice customers).<sup>1</sup> We may also access consumption data from retailers (and/or metering providers), and we may use this information for permitted purposes, such as network planning and management of the network such as contacting customers in the event of outages and some network maintenance, such as tree trimming.

7. Looking forward, access to energy data is going to become even more important in a decarbonised New Zealand. Customers will want access to ICP-level consumption data and power quality data to enable them to make efficient and affordable choices. We will also continue to need access to this data under the current regulatory regime from electricity retailers and metering providers for business-as-usual purposes as well as planning of flexibility services, replacement, renewal, and system growth. Flexibility traders will want access to network congestion data, ICP level consumption and power quality data to
  - understand a customer's individual need (after being requested by the customer) and tailor distributed energy resources services to fulfil those needs, and
  - understand network capacity and therefore what distributed energy resources offerings will or won't work.
8. Consequently, it is important that the controls and obligations around the use and access of data under the consumer data framework will allow for these different purposes and relationships to continue.
9. Please let us know if you have any questions about our submission. The contact person for this submission is Vivienne Wilson, Policy Lead, [vivienne.wilson@oriongroup.co.nz](mailto:vivienne.wilson@oriongroup.co.nz)

Yours sincerely



Vivienne Wilson

**Policy Lead**

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<sup>1</sup> By way of example, information can include monthly Consumption Data at an ICP level, half-hourly Consumption Data at an ICP level (typically this is just for larger commercial electricity connections), and customer details including names, addresses and contact details.