Appendix D – Submission form

Improving product and consumption information exchange – EIEP13C and EIEP14C

Please email your submission to consumer.mobility@ea.govt.nz by 5pm, Thursday 8 October 2026

Name	Dan Roos
Organisation	Buller Electricity Limited

Questions	Comments
Q1. Do you agree with the proposed changes/updates to EIEP13C? If not, what would you change?	BEL agrees with the proposed updates. The request period, channel and reactive-energy fields should make requests more targeted, while the qualification that recipients may return all available data is sensible. Making the customer and ICP identifiers mandatory should improve matching. Please ensure the procedures explain how unsupported filters are handled. Before publication, reconcile the version references: the cover, version-control table and "Version" field should identify the same release.
Q2. Do you agree with these changes also being reflected in the proposed EIEP14C where indicated? If not, what would you change?	Yes. Applying the shared changes to EIEP14C should make the request formats more consistent and reduce duplicated development. Please keep the shared JSON keys, date-time rules, authorisation fields and version conventions aligned across the formats. The final specifications should also be checked end to end against the response formats, with clear examples for both CSV and JSON.
Q3. Do you agree with our proposal for EIEP14C to only request EIEP14B files? If not, do you think that adding the capability for EIEP14C to also request EIEP14A files would be worth the complication of the file format?	Yes. EIEP14C should request EIEP14B, which contains a consumer's plan information and requires appropriate authority. EIEP14A is general retailer product information and can be obtained separately without a consumer-specific request. Adding EIEP14A to EIEP14C would add complexity without a clear benefit while that information remains publicly available.
Q4. Do you agree with our proposal not to include an automatic electronic authorisation consent system within the EIEP14 suite?	Yes. BEL supports avoiding a separate real-time consent system in these formats where Open Electricity is expected to establish a broader consent and authentication framework. In the interim, the procedures should clearly set out how retailers verify authority, protect personal information, and handle requests where consent cannot be confirmed. The authorisation code should support those existing processes, not replace them.
Q5. Do you agree with our proposal to use a customer authorisation code within the EIEP14C file as the mechanism to indicate customer consent? If not, why not?	Yes, provided the code is a reference to a retailer-held record of authority and is not treated as consent by itself. The procedures should explain how codes are issued, matched to the relevant consumer and request, and checked for expiry or withdrawal. Where no code has been agreed, a request should still be able to proceed through the existing evidence-of-authority process.

Questions	Comments
Q6. Should the authorisation code and statement of written authority be common between EIEP13s and EIEP14s? If so, should this be made explicit within the C formats?	Yes. A common authorisation code and statement of written authority across EIEP13 and EIEP14 would reduce duplication for consumers and agents. This should be stated explicitly in both C formats and the procedures. The documentation should distinguish the code, which references a record, from the requester's declaration that valid written authority has been obtained.
Q7. Do you agree with our proposal for EIEP14C to support both JSON and CSV formats? If not, why not?	Yes. Supporting both JSON and CSV accommodates different system capabilities and avoids making access dependent on immediate conversion to one format. Both formats should have equivalent content, validation rules and examples so that the choice of format does not change the information supplied or create inconsistent outcomes.
Q8. What is the sector readiness to adopt JSON as the default file format for EIEP14C files? If your organisation does not currently support JSON, when might this be feasible?	Readiness is likely to vary between retailers, agents and other participants. BEL cannot reliably assess the sector's readiness or make commitments on behalf of those parties. We support retaining CSV while JSON capability develops, with the Authority assessing implementation experience before making JSON the default. Any transition should include notice, testing guidance and a reasonable lead time.
Q9. Should a field be included in EIEP14C to allow nomination of either JSON or CSV file formats? Is there value in allowing requestors to specify the expected response format, noting that CSV has been nominated as the default format?	A response-format field could be useful where the requestor needs a particular format, but should be included only if it can be implemented consistently without creating avoidable errors or rejection of otherwise valid requests. The formats should continue to allow parties to agree a response format. If CSV remains the default, the specification should say clearly how a different format is requested and confirmed.
Q10. Would aligning data standards for requests for consumption and product information reduce development costs, or are the bulk of the costs associated with the implementation of JSON data formats and real-time authentication processes?	Aligning the request structures should reduce duplicate mapping, validation and maintenance across the protocols. However, the main costs will also depend on each organisation's existing systems, registry integration, testing, security and authentication arrangements. JSON conversion and any real-time consent process may add significant cost, but the consultation does not provide enough information to quantify their relative share.
Q11. Do you foresee any issues with the proposed requirement for retailers to treat consumer requests for their plan information as if they were EIEP14C requests for EIEP14B files?	No fundamental issue, provided this applies to an explicit request for the consumer's plan information and the response is practical for consumers to receive. The procedures should specify that consumers receive both the EIEP14B file and an understandable explanation, and clarify how the file is delivered, what service timeframe applies, and how identity is verified through the retailer's existing channels.
Q12. Do you believe this proposal would ensure consumers are provided with the necessary information to compare electricity plans?	It is a useful foundation, but the file alone will not guarantee a meaningful comparison. Consumers and comparison services also need accurate consumption information and clear details of all relevant charges, discounts, eligibility criteria, plan terms and any time-of-use conditions. The consumer-facing explanation should make assumptions and limitations clear, particularly where actual consumption or some plan features are unavailable.

Questions	Comments
Q13. Is the proposed EIEP14C request sufficient for third parties to electronically request EIEP14B files? If not, what would you suggest to achieve this?	The proposed fields appear sufficient to identify a single consumer request and the relevant ICP, subject to the final specification being internally consistent. The procedures should cover acknowledgements and errors, including invalid or expired authority, unmatched customer details, duplicate requests, unavailable data, and delivery or retry arrangements. These rules will help third parties handle failures consistently and safely.
Q14. Do you agree with the Authority's view that implementation of EIEP13C and EIEP14C should be straightforward, for the reasons given above? If not, why not?	We agree that the changes may be manageable for organisations with established systems, but would not assume implementation will be straightforward across the sector. The new request fields, mandatory identifiers, JSON handling, registry routing, consent checks and end-to-end testing will require configuration and coordination. The final formats and procedures should be published early enough to allow participants to assess and test the changes.
Q15. What additional development effort is required to be able to process EIEP13C and EIEP14C beyond what has already been done to implement EIEP13A, EIEP13B, EIEP14A, and EIEP14B?	The additional effort will depend on each organisation's existing systems and role. It may include updating request validation and mapping, supporting new fields and JSON keys, handling optional filtering parameters, checking identifiers and authority, and testing registry receipt, response delivery and error cases. BEL cannot provide a reliable cost estimate without a defined system scope; retailers and agents will need to assess their own implementation requirements.
Q16. If there is a period between implementation of EIEP13A, EIEP13B, and EIEP14B, and the implementation of EIEP13C and EIEP14C, cause issues for third party access to consumption and/or product information? If so, how might these be mitigated?	Yes, a gap could make the new standardised request route unavailable to some third parties, even though the underlying Code obligations to provide information remain. The Authority should publish final specifications and procedures promptly, confirm the implementation timetable, and encourage early testing. During any transition, retailers should continue to accept reasonable alternative request methods and provide the prescribed response files.
Q17. Do you agree with the Authority's view that the proposals for the new EIEP14C and updated EIEP13C formats would collectively support informed consumer choice by enabling more accurate and consistent plan comparison and a more efficient and competitive market?	Yes, in principle. Standard request formats and more consistent access to consumption and product information can help consumers and their authorised agents compare plans and make informed choices. The benefits will depend on accurate data, clear consumer explanations, effective consent safeguards and workable implementation. The proposals support competition, but do not by themselves guarantee lower prices or better outcomes for every consumer.