Appendix D – Submission form

Improving product and consumption information exchange – EIEP13C and EIEP1

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

Name	Helen Roberts
Organisation	Contact Energy Ltd

Questions	Comments
Q1. Do you agree with the proposed changes/updates to EIEP13C? If not, what would you change?	Yes, we agree: the proposed changes to the request format appear to be relatively minor and focused on improved standardisation and information provision to customers.
Q2. Do you agree with these changes also being reflected in the proposed EIEP14C where indicated? If not, what would you change?	Contact has no strong views on this point.
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, we agree with the proposal for EIEP14C to only request EIEP14B files. The request is easier and faster for us to interpret and respond to if it relates to an individual customer. If the request relates to a large group of customers, this requires more analysis and is more time-consuming to respond to. We also consider that adding the capability for EIEP14C to also request EIEP14A files would not be worth the complication of the file format.
Q4. Do you agree with our proposal not to include an automatic electronic authorisation consent system within the EIEP14 suite?	Yes, we agree that this is unnecessary. The current process works well, and any new development work is likely to overlap with the work that will be required for the CDR.
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?	Contact agrees in principle with including a customer authorisation code in EIEP14C as a pragmatic way to reference customer consent already recorded by the retailer. It would be helpful for the Authority to specify minimum requirements for the code and associated consent record. These should include who may generate or issue the code, the customer, ICP and third party to which it applies, its duration and expiry, standard error responses etc. Retailers should retain flexibility to integrate the code with their existing consent-management processes, rather than being required to put in place a separate code-issuance system.
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?	Contact supports using a common authorisation reference across EIEP13C and EIEP14C where the underlying authority covers both consumption and product information. However, the use of a common code should not expand the scope of the customer's consent. These requirements should be explicit in the C formats and the associated procedures document.

Q7. Do you agree with our proposal for EIEP14C to support both JSON and CSV formats? If not, why not?	Yes, we agree with the proposal for EIEP14C to support both JSON and CSV formats. Supporting both formats is a practical approach that recognises the different system capabilities that currently exist across retailers and third parties. While JSON is likely to become the preferred format as the sector moves towards Open Electricity, CSV remains widely used and will continue to be important for some participants. Requiring JSON only at this stage could create unnecessary implementation costs and complexity without delivering significant additional benefits. Continuing to support both formats will help maximise participation and interoperability while allowing retailers and third parties to transition to JSON as their systems evolve.
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?	Contact is currently building the capacity to support JSON file formats. We will be able to produce EIEP14As and 14Bs in JSON format from 30 October 2026.
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?	Yes, we strongly agree that there should be a clear mechanism for the requestor to specify the output format (JSON or CSV). Requestors will have varying requirements and technical capabilities, so need the flexibility to nominate the most suitable format for them.
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?	As indicated in the question, the primary change effort and resulting cost for Contact relates to introducing JSON formats. We will be looking to develop and implement JSON formats for EIEP13 related protocols next year, in alignment with the MBIE CDR delivery pipeline given there are related technology exchange requirements where its logical and more cost effective to architecturally deliver these the same time.
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?	Contact does not foresee any significant issues with this proposal. Consumers should receive the same underlying plan information whether they request it directly from their retailer or authorise a third party to obtain it on their behalf.
Q12. Do you believe this proposal would ensure consumers are provided with the necessary information to compare electricity plans?	Contact agrees that this proposal will help ensure consumers have access to the information they need to compare electricity plans. Providing plan information in a consistent EIEP14B format should improve the consistency and portability of plan information and support comparison tools and services. We also support consumers receiving the information in a form that is understandable to a typical consumer.
Q13. Is the proposed EIEP14C request sufficient for third parties to electronically request EIEP14B files? If not, what would you suggest to achieve this?	Yes, in our view it is sufficient.
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?	While EIEP14C builds on concepts already used in EIEP13C and does not require a real-time consent system, retailers will still need to make some system and process changes. Contact will need to build request handling, consent management, validation processes and response mechanisms. However, we consider the proposal to be proportionate and achievable overall.
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?	Our primary concern remains in relation to a congested regulatory pipeline and compressed delivery timeframes. Using this particular consultation as an example, the formats and technical specifications are still in draft which makes it extremely difficult (almost impossible) to plan for and meet an end of October delivery date.

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?	Contact does not anticipate significant issues if there is a short period between implementation of EIEP13A, EIEP13B and EIEP14B, and implementation of EIEP13C and EIEP14C. We do not expect the introduction of the C formats to create a significant new group of customers or third parties seeking access to information. Retailers will still be able to provide product and consumption information through existing request channels and processes during the transition period.
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?	Contact agrees that the proposed EIEP14C and updated EIEP13C formats will support informed consumer choice by improving access to consistent product and consumption information. Standardised formats should make it easier for consumers and authorised third parties to obtain and use information, supporting plan comparison and consumer decision-making. We think the proposals are a practical step towards more efficient information exchange and – potentially - a more competitive market.