8 October 2026

Electricity Authority Te Mana Hiko
Consumer Mobility team
By email: consumer.mobility@ea.govt.nz

Submission on Improving product and consumption information exchange: EIEP13C and EIEP14C

Dear Consumer Mobility team,

Thank you for the opportunity to comment on these important changes. Cortexo Limited works in electricity information data exchange, and we believe we request more consumer data than any other third-party representative. We value being part of this work and the open way the Authority has run it.

We support the proposed EIEP13C and EIEP14C. A standard request format for plan information, built on the one we already use for consumption data, should make it easier for consumers to compare plans and switch.

Our main concern is how this work lines up with the Consumer Data Right (CDR), and when. It is not yet clear how the EIEP formats and the authorisation rules in the Code will sit alongside the CDR once it starts. We would like one timeline covering both, so that retailers and requestors do not build the same thing twice. We also ask for a clear timeline for JSON, which remains optional. Without dates, it is hard for us to plan our own development.

Our answers to the consultation questions are on the following pages.

We would be glad to talk through any of our comments with you.

Kind regards

Terry Paddy
Cortexo Limited
terry.paddy@cortexo.com

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	Terry Paddy
Organisation	Cortexo Limited

Questions	Comments
Q1. Do you agree with the proposed changes/updates to EIEP13C? If not, what would you change?	We support all eight changes, with the comments below. In this submission, 'the Code' means the Electricity Industry Participation Code, and 'authorisation code' means the ConsumerAuthCode field. • **Change 1 (JSON keys).** Several keys, including ConsumerAuthCode, match those in EIEP13A and EIEP14B. Where possible, the keys should also match the field names MBIE adopts for the Consumer Data Right (CDR). MBIE's July 2026 information pack says the CDR standards will share existing retail electricity terms, definitions and formats where suitable. See our comment on JSON under Q7. • **Change 2 (ISO 8601).** EIEP13C and EIEP14C specify the time zone offset (for example +1300), which we need. The example in EIEP14B uses a shorter form (see Q6). • **Change 3 (date range, meter channels, reactive energy).** We suggest adding response codes to the EIEP13A table (000 to 006) for 'format not supported' and 'period not available'. • **Change 4 (mandatory customer number, customer name and ICP).** We agree for customer name and ICP. Customer number is a concern. Schedule 11.6 of the Code asks for it, but some consumers will not know their number. Under clause 11.32ED(4) of the Code, the 2 business day decision time does not apply if the retailer believes on reasonable grounds that a request does not meet the requirements of the EIEP. We ask that a request with a correct customer name and ICP, but no customer number, remains valid where the retailer can identify the customer. • **Change 5 (installation address removed).** We agree, provided the ICP remains mandatory. • **Changes 6 to 8 (protocol specifications, table of codes, version field).** We agree. The statement of written authority and authority expiry date fields have been in EIEP13C since version 1.1. We rely on the statement of written authority and ask that it is retained (see Q5).

Questions	Comments
Q2. Do you agree with these changes also being reflected in the proposed EIEP14C where indicated? If not, what would you change?	Yes, with one comment. • We support the shared changes as drafted in EIEP14C, subject to our comment on customer number in Q1. • EIEP14C retains the request start and end dates. The August 2026 decision paper says EIEP14B provides the current plan applying to an ICP, including known future tariff changes (executive summary and paragraphs 2.1 and 3.39). It is therefore unclear how a period applies to an EIEP14B request. We ask the Authority to explain how the period is used, or to remove the dates.
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. Requesting EIEP14A involves no consent, so adding it to EIEP14C would complicate the format for little benefit. We note that paragraph 3.24 of the August 2026 decision paper describes EIEP14C as the request format for both EIEP14A and EIEP14B, whereas this consultation proposes EIEP14B only. We ask the Authority to confirm which is intended noting that the information in the EIEP14C does not relate to or enable filtering of EIEP14A data. However, there is currently no automated way to request EIEP14A files, for example filtered by network region. Without one, we must rely on manual email requests, which does not support the digitalisation of the electricity sector. We ask the Authority to consider how EIEP14A requests could be automated outside EIEP14C. Clause 11.32G of the Code requires retailers to supply plan information within 5 business days of a request. MBIE's pack states that authorisation is not required to obtain product data, which must be freely accessible. We therefore expect, although we cannot be certain, that requests for EIEP14A files will be needed less once the CDR starts. Separately, the Omnibus 7 consultation (section 3) proposes to clarify that plans requiring specified equipment, such as an electric vehicle or solar panels, are within the definition of generally available retail tariff plan. We support this, as it widens the plans covered by EIEP14A.
Q4. Do you agree with our proposal not to include an automatic electronic authorisation consent system within the EIEP14 suite?	Yes. Real-time consent checking is the purpose of the CDR, and building it into the C formats would duplicate that work and add cost for retailers and requestors (paragraphs 2.20 and 4.13). The August 2026 decision paper partly answers our concern about how the two regimes fit together. It says the EIEPs will continue to have a role alongside the CDR, including where a retailer is not a designated data holder (paragraphs 2.5, 2.6 and 3.10), and that Code authorisation processes may continue to be used from the commencement of EIEP14B (paragraph 3.43). It also says the Authority will review alignment once the CDR framework is finalised (paragraph 3.12). The Omnibus 7 consultation is consistent with this, as it proposes to correct the Schedule 11.6 authority forms that take effect on 30 October 2026. Neither paper says whether clauses 11.32A to 11.32EG of the Code will remain in force for retailers that are designated data holders once electricity is designated under the CDR, or when that review will happen.

Questions	Comments
	MBIE's pack records that respondents to its June 2026 survey asked for the CDR to align with Electricity Authority obligations and information exchange protocols, but it does not say how this will be done. We ask the Authority to agree this with MBIE and publish a clear statement, with dates. Without one, participants risk building for one regime and then rebuilding for the other.
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?	We support the authorisation code as an optional field, as drafted. We do not support it becoming the main way of showing consent. We note the Authority's statement that the field is a reference to the authorisation record, not a request identifier (decision paper, paragraph 3.42), and that guidance on its use will be given in the EIEP14C procedures document (paragraph 3.44). Paragraph 4.18 describes the authorisation code as the most common method in the industry. That is not our experience. Cortexo does not use it, and we regularly request a large volume of consumer data. **How Cortexo obtains and evidences authority** 1. The consumer electronically signs a digitally created authority. The signature meets the Contract and Commercial Law Act 2017, as clause 11.32EE(2) of the Code requires. 2. We send the consumer the signed PDF, with a link they can use to revoke the authority. 3. We keep a copy in our system with a digital fingerprint, so that any alteration can be detected. 4. In each EIEP13C request, we warrant that we hold the consumer's authority, using the statement of written authority field. A retailer can ask us for the document. This approach is consistent with the Code. Clause 11.32ED(1)(a)(i) provides for a request that includes the agent's statement that it holds a written authority, in the Schedule 11.6 form, that remains in force. Clause 11.32EC(3) allows an agent to retain the authority, or other evidence, and give a copy to the retailer on request. Clause 11.32EB(2) prevents a retailer refusing a request because an authorisation is not in a particular form or does not follow a particular process. We are willing to give retailers our own authorisation code, which they could use with other identifying details to check our signed authorities automatically. We would do so if the Authority confirms that this approach will remain available after the CDR starts. We are reluctant to build it if the CDR will replace the EIEP13C and EIEP14C methods within the next 12 months, because the work could be wasted. A clear indication of timing would allow us to decide. **We ask that the procedures document** • states that a blank authorisation code is a valid request and must be treated the same as a request that includes one; and

Questions	Comments
	• confirms that the other ways of showing authority under clauses 11.32EC to 11.32EE of the Code remain valid, including a statement of written authority backed by a stored authority; and • confirms that a statement of written authority in the Schedule 11.6 form is sufficient for EIEP14C requests. From 30 October 2026 the Schedule 11.6 forms also cover information about the consumer's retail tariff plan and product identification code (Omnibus 7, Appendix F).
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. EIEP13C and EIEP14C already use the same keys and wording for the authorisation code, statement of written authority and authority expiry date, and we support this. Both formats should say so explicitly. We found the following inconsistencies. • **Field lengths.** The authorisation code is 20 characters in EIEP13C and EIEP14C, but 36 characters in EIEP13A and EIEP14B, which return it. A 36 character code, such as a UUID, cannot be sent in a 20 character field. Customer number and ICP are 15 characters in EIEP14C but 30 characters in EIEP14B. • **Time zone offset.** The RunDateTime example in EIEP14B uses +12, whereas EIEP13A, EIEP13C and EIEP14C use the form +1300. • **Authority expiry date.** The expiry date is mandatory and may be up to 24 months from the request date. MBIE's pack limits CDR consent to 12 months. Please clarify how these will fit together.
Q7. Do you agree with our proposal for EIEP14C to support both JSON and CSV formats? If not, why not?	Yes, in the short term. **Our comment on JSON and the CDR (also applies to Q8, Q9 and Q10)** We support a clear move to JSON, with a clear statement of how it will be used. We assume that under the CDR, JSON will not be exchanged as files but through a real-time RESTful API. MBIE's July 2026 pack describes REST APIs exchanging only JSON, with a synchronous request and response. Paragraph 4.7 of the paper says Open Electricity will provide automated, real-time exchange, and paragraph 4.21 says JSON will be the required format. The August 2026 decision paper makes JSON optional for now (paragraphs 3.23 and 4.1(c)) and expects retailers to adopt it in line with the CDR (paragraphs 3.17 and 3.23). EIEP13C, EIEP14C and EIEP14B each allow JSON as 'files or API responses'. We welcome this, but the C formats do not say how an API request would be sent or authorised, so it is unclear whether this is the same API as the CDR's. If JSON files through the registry transfer hub and JSON through the CDR API are separate systems, we would be building two systems, and one would become redundant. The decision paper says the EIEPs will continue alongside the CDR (paragraphs 2.6 and 3.10), but the overall picture is still unclear to us. We ask the Authority and MBIE to state: 1. Whether, for retailers that are designated data holders, the EIEP file exchanges stop once JSON becomes mandatory under the CDR, or continue alongside it.

Questions	Comments
	2. When the CDR is expected to start for electricity, and whether the Code processes will be removed or changed by a set date. 3. Whether JSON through the hub is a step towards the API, or a separate long-term channel. None of the consultation paper, the decision paper or MBIE's pack gives dates. A single timeline covering both regimes would let participants plan development and avoid building systems that will be replaced.
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?	Cortexo would handle JSON files or API requests as soon as they are available. Our assumption is that no retailer plans to implement JSON files or API connections before the CDR is live, so we do not consider it prudent to build JSON capability at this point. This matches the Authority's position that retailers need not adopt JSON until it is required under the CDR (decision paper, paragraphs 3.23 and 4.2(c)). Readiness therefore depends on the CDR timeline (see Q7). We would support JSON as the default if the Authority sets a date that aligns with the CDR start, so that retailers do not build JSON file handling that the CDR API later replaces. JSON in the EIEPs should carry over to the CDR API, with the same field names and structure wherever possible. MBIE's pack says the CDR standards will share existing retail electricity terms and formats where suitable, so this should be achievable. We also note that EIEP14B describes JSON as its primary format, with CSV an additional option agreed between the parties (business requirement 1), while the consultation treats CSV as the default. These should be aligned.
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?	The draft EIEP14C has no such field. We support adding one if retailers intend to offer JSON before the CDR starts. If they do not, responses will remain in CSV and the field would serve no purpose. This would be a short-term measure. See our comment under Q7 on whether file formats will continue once the CDR API is available.

Questions	Comments
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?	The two request formats are already closely aligned. EIEP14C uses the same fields and JSON keys as EIEP13C, other than those that apply only to consumption data, so further alignment would save little. This is consistent with the Authority's expectation that EIEP14C, being derived from EIEP13C, needs minimal system or process development (decision paper, paragraph 3.24). The remaining saving is in handling authority once for both. We expect most of the cost to be in JSON API handling and real-time authentication. The CDR will require both in any case, and this cost would be wasted if the EIEP formats are replaced. That is why we need the timeline requested in our comment under Q7. Further additions to the C formats are hard to justify until the CDR dates are known.
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?	We do not foresee issues with this proposal. We support consumers receiving the same information whether they ask directly or through an agent (paragraph 4.27).
Q12. Do you believe this proposal would ensure consumers are provided with the necessary information to compare electricity plans?	In part. • EIEP14B contains most of the necessary plan information: the plan, fixed and variable rates, time of day schedules, future tariff changes, and conditions such as exit fees and fixed terms. • EIEP14B rates are GST exclusive and exclude the effect of discounts (business requirement 6). The Authority has kept the GST exclusive requirement to stay consistent with EIEP14A, while accepting that it is not fully consistent with the Better Billing principles (decision paper, paragraphs 3.54 to 3.57). Although this does not affect how we will process EIEP14B files, consumers compare against their bills, so the consumer-readable version (consultation paper, paragraph 4.29(b)) should show GST inclusive rates and the discounts that apply to that consumer. A common set of labels and units would help consumers compare retailers' versions. • The Authority accepts that a bill cannot always be reproduced from EIEP13A, EIEP13B and EIEP14B information, in part because plan-specific discounts and free usage periods are not included (decision paper, paragraphs 3.61 and 3.64). Given this, we ask that the consumer-readable version, when provided to a consumer, include those discounts and free usage periods where they apply to the consumer.

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?	Mostly. We suggest two changes. • **A way to reject a request.** EIEP13A has response codes (000 to 006), for example 'no customer record' and 'no agent authority'. EIEP14B has none, so a retailer cannot tell a requestor why an EIEP14C request has failed. We ask that response codes be added to EIEP14B. • **Matching field lengths** (see Q6), so that a 36 character authorisation code or a 30 character customer number can be sent. In the longer term, third parties will need a real-time API rather than files (see our comment under Q7).
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?	In part. The EIEP13C changes are minor and EIEP14C is close to EIEP13C, so the file changes themselves should not be difficult. However, we do not consider the overall implementation straightforward, for three reasons. • **Timing.** A decision is expected in late October, and retailers are expected to respond to EIEP14C requests after 30 October 2026 (paragraphs 5.3 and 5.6). That leaves almost no time to build and test. We suggest a start date at least three months after the final formats are published, with the current EIEP13C accepted until then (see Q16). • **The harder parts are not the file layout.** The decision paper says JSON (paragraph 3.23) and real-time authentication (paragraph 3.25) are not required from commencement, which helps. However, checking authority and managing authorisation codes still need to be built if they become the expected route (see Q5, Q10 and Q15). • **The CDR.** It is unclear whether the CDR will replace these formats within about a year, which affects whether the investment is justified (see Q7).
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?	**For requestors** • Build EIEP14C requests from scratch. • Add the date range, meter channel and reactive energy options to EIEP13C, and make customer number, customer name and ICP mandatory. • Potentially handle JSON and CSV responses, and rejections. • Decide whether to build our own authorisation code system to make checks easier for retailers (see Q5). This depends on the statement of written authority and authority expiry date being available, and used in EIEP14C in the same way as in EIEP13C. **For retailers, we expect** • Receiving and checking EIEP14C requests, and matching customer name, customer number and ICP. • Checking authority from the document or evidence, or by looking up an authorisation code.

Questions	Comments
	• Filtering by date, and by channel for EIEP13C, if they choose to, and returning EIEP14B in the agreed format. • Adding a rejection response for EIEP14C, which EIEP14B does not have today. • Issuing and storing authorisation codes, if they are used. The largest items are checking authority, managing authorisation codes if they are used, and JSON. The file layouts are small by comparison. All of this may be wasted work if the CDR replaces the formats.
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, mainly for high-volume requestors such as Cortexo. • We assume we will continue to use the current EIEP13C. Until retailers have built EIEP14C, requests for plan information will have to be made by email, which is slow, differs between retailers, and does not suit large volumes. • For consumption information, the Code continues to apply in the interim. Retailers must supply the information within 5 business days (clause 11.32B), and cannot refuse a request because the request or authorisation is not in a particular form or does not follow a particular process (clause 11.32EB(2)). The 2 business day decision time in clause 11.32ED applies only to requests made through the EIE System. For plan information, the position depends on the Code amendment taking effect on 30 October 2026. The decision paper confirms that existing Code authorisation processes may continue to be used from the commencement of EIEP14B (paragraph 3.43). **How the problem could be reduced** 1. Keep accepting the current EIEP13C (version 1.2) alongside the updated version (2.0) until a stated end date, using the version field to tell them apart. The decision should state that date. 2. Publish the start date for the C formats well in advance, with the same date for all retailers. 3. State in the procedures that, in the interim, the Code's time limits and clause 11.32EB(2) continue to apply to requests for consumption information made by other means.
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?	In part. A standard request format with more detail should support better comparisons through third-party services. We have two concerns, based on the criteria in paragraph 6.2. • **Efficiency and proportionality (6.2(d)) and strategic alignment (6.2(h)).** Retailers and requestors will bear the cost of the C formats, including JSON and authorisation code handling, while the CDR is being established to do a similar job in real time. If the C formats are replaced soon, this cost reaches consumers for little benefit. The Authority has said it will review alignment once the CDR framework is finalised (decision paper, paragraph 3.12), but has not given a date.

Questions	Comments
	We cannot agree the proposals are proportionate until there is one timeline for both regimes. • **Competition.** If the authorisation code became the expected route, each requestor would need to agree authorisation codes with each retailer before requesting data. This would slow new entrants and weaken competition. Keeping the authorisation code optional, and keeping evidence-based authority valid (see Q5), avoids this. With these points addressed, we would support the proposals as a short-term step.