8 October 2026

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The Electricity Authority
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By email: consumer.mobility@ea.govt.nz

Genesis Energy submission on EIEP13C and EIEP14C

Genesis Energy Limited (**Genesis**) welcomes the opportunity to comment on the Electricity Authority's (**Authority**) consultation paper *Improving product and consumption information exchange – electronic request form* dated 17 September 2026 (**Paper**).

Genesis supports standard ways for consumers and their authorised agents to obtain consumption and plan information. We also support a proportionate EIEP13C update and a focused EIEP14C for EIEP14B requests, subject to three changes.

We ask that:

(1) Customer authorisation codes be kept genuinely optional. A statement of written authority and appropriate verification must remain workable without a retailer issuing and maintaining a new code.

(2) Publish worked CSV and JSON examples and final procedures, then allow a realistic period to build and test the C formats. Both draft protocols state an effective date of 30 October 2026, although the consultation anticipates a final decision only in late October. That sequence does not allow reliable implementation of the final specifications. Genesis has several major technology projects inflight, and so any changes need to be scoped and the interaction with these assessed. We are also heading into the summer brownout / shutdown periods which adds to resourcing and scheduling constraints. Accordingly, we ask that the implementation period be moved to 1 April 2027, to allow changes to be scoped, resources allocated accordingly, and the changes tested and implemented.

(3) The Authority agree a transition with MBIE's Open Electricity work so that retailers and requestors do not have to maintain duplicate request and consent channels indefinitely. During any interim period, the Authority should specify a reliable route for third-party requests and communicate it clearly.

Our responses to the consultation questions are set out in the Schedule.

Please note that a portion of the responses to questions 8 and 15 are confidential and to be redacted from any published version of this submission.

Please contact me if you have queries or would like to discuss this submission further.

Yours sincerely,



Warwick Williams
Senior Regulatory Counsel | Group Insurance Manager

SCHEDULE

Questions	Comments
Q1. Do you agree with the proposed changes/updates to EIEP13C? If not, what would you change?	We have no material concerns with the proposed changes but consider the new fields "Request meter Channels" and "Include reactive energy" add complexity which we feel is unnecessary and of limited value.
Q2. Do you agree with these changes also being reflected in the proposed EIEP14C where indicated? If not, what would you change?	Yes, where the same fields serve the same purpose. Apply the same authorisation and identity rules to both C formats and use identical JSON keys where fields are common.
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. Limiting to EIEP14B files reduces complexity. As EIEP14A is publicly available information this can be made permanently available on Retailer webpages or via provisions under Open Electricity
Q4. Do you agree with our proposal not to include an automatic electronic authorisation consent system within the EIEP14 suite?	Yes.
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?	Agree as an optional field. It is our experience that this field is not used at all by any of the regular third party EIEP13 requestors in the industry. The use and storing of Consumer Authorisation codes will involve significant development as it will require structure changes to CRM systems and potentially new systems to generate and communicate codes. The requestors 'Statement of Written Authority' provides a simple solution, that can still be challenged by Retailers. We ask that the Authority clarify how false or unsupported declarations by requestors will be addressed.
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, and make the common fields and their effect explicit in both C specifications. The procedures should also explain how these interim records relate to consent under Open Electricity.
Q7. Do you agree with our proposal for EIEP14C to support both JSON and CSV formats? If not, why not?	Yes. Supporting both formats accommodates different system capabilities. The JSON format is not used by Genesis and CSV is our preferred format for EIEP13 and EIEP14 files. We ask that CSV is kept available as a default, with JSON usable as an option by agreement or once both parties can process it. We also ask that the Authority supply worked examples and validation rules for each format before final implementation.

Questions	Comments
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?	Genesis systems cannot currently adopt JSON as the EIEP14C default. Our present EIEP request handling uses CSV and so we should be able to receive CSV format. Accordingly, we ask that CSV is retained as the default, with JSON as an optional alternative. 
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, an optional field for the requestor's preferred response format would assist routing, provided it is a preference rather than a condition of a valid request. A retailer unable to provide JSON should be able to supply CSV, which still meets the objectives of the EIEP changes.
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 equivalent fields and rules across EIEP13C and EIEP14C reduces marginal development and handling costs. However, the bulk of costs will be in developing a file -based request system via the Registry, another system for Open Electricity, and then processes and templates for individual consumer requests. The Authority should publish a joint transition and review plan with MBIE before asking the sector to invest in overlapping mechanisms.
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?	Yes. An EIEP14B file in JSON format is best suited to machine reading and could be hard to decipher for most consumers. Most consumers who phone or email their retailer about their plan want to understand it in plain language rather than receive a data file. The use of ISO8601 date/time formatting is not consumer friendly and expected to cause confusion (more so with consumption data). Retailers should be required to offer the EIEP14B file and provide it on request, rather than send it in every case.
Q12. Do you believe this proposal would ensure consumers are provided with the necessary information to compare electricity plans?	The proposal provides the necessary information for consumers to provide to experienced agents to compare electricity plans once combined with EIEP13A and EIEP14A data. The use of JSON format for product information and ISO8601 for time formats will mean most consumers will not be able to use this information without technical expertise and assistance from experienced agents.

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?	In principle, yes.
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?	No, not on the proposed timetable. EIEP13C may be an update to an existing format, but EIEP14C is a new intake and verification process. JSON handling, authorisation, file matching, routing and testing need final specifications and examples. We cannot scope and build until format is locked in, and we can't schedule build until timeframes are set and interaction with inflight IT projects are assessed and managed. We are also heading into the summer brownout / shutdown periods which adds to resourcing and scheduling constraints. Accordingly, we ask that the implementation period be moved to 1 April 2027 to allow changes to be scoped, resources allocated accordingly, and the changes tested and implemented.
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?	EIEP13C – Although in the specifications, Customer authorization codes are not currently used by requesting participants. As such Genesis does not have an integrated system to record codes against customer accounts for verification against EIEP13C/14C files. [redacted] EIEP14C – process changes to ensure authorisation when requests received from third parties. Data development will be ongoing for EIEP14A and B for Genesis given the current manual transformation of data required to meet the format. As noted earlier, the EIEP14C file is dissimilar from the EIEP13C file (and all other EIEP files) in that it only has a Header row and no Detail lines.
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. If third parties are sending requests via non-Registry channels this falls outside established processes and there is a risk that the requests are not received, sent to the wrong team/channel, and the response is delayed. This could be mitigated by the EA not implementing the new C formats until the format has been confirmed and sufficient time given to requesters to build their request files, and retailers to adapt their systems to receive the new format. Requestors can still request directly, and Retailers are still required to respond but there is a risk to customer experience and Retailer compliance with delivery timeframes where non-standard processes are used.

Questions	Comments
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?	Potentially, but ultimately this depends on consumer engagement and understanding of how to use the data. Standard requests can improve access and consistency, but plan comparison depends on the quality and usability of the data, informed consumer consent, and a reliable request route.