IMPROVING PRODUCT AND CONSUMPTION INFORMATION EXCHANGE

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

8 October 2026

Consultation – Improving product and consumption information exchange

Mercury welcomes the opportunity to provide feedback on the Electricity Authority's consultation paper 'Improving product and consumption information exchange – EIEP13C and EIEP14C'.

While we generally support standardising the request of consumption and product information, we are concerned by the Authority's suggestion that these requirements may be in place from 30 October. Implementation of both EIEP13C changes and a new EIEP14C will require system development. These changes come on top of significant system changes already underway to implement a raft of other new requirements, including the mandating of other EIEPs. All of these changes need to be scoped, prioritised and scheduled. Additional complexity arises for Mercury as we operate multiple billing systems.

With final decisions on EIEP13C and EIEP14C not expected until late October, and taking into account a change freeze period over the Christmas break, we suggest an implementation timeframe of six months from the final decision would be reasonable.

Our responses to the Authority's specific consultation questions are set out in Annex A below.

Yours sincerely

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Annex A: Responses to the Authority's consultation questions

Questions	Comments
Q1. Do you agree with the proposed changes/updates to EIEP13C? If not, what would you change?	We generally agree with the proposed changes. We have the following minor suggestion: The Consumer Authorisation Code is specified in EIEP13C as having 'Char 20' while EIEP13B limits the same attribute to 'Char 36'. This should be consistent.
Q2. Do you agree with these changes also being reflected in the proposed EIEP14C where indicated? If not, what would you change?	Yes.
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?	We agree it is not worth allowing EIEP14C to also request EIEP14A files. We currently process a very limited number of EIEP14A files; requiring further system changes to process such a small number of requests would be disproportionate to the benefits.
Q4. Do you agree with our proposal not to include an automatic electronic authorisation consent system within the EIEP14 suite?	Yes, we agree. This would be more appropriately developed under the Open Electricity regime.
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 have a number of concerns with this approach: • Where a customer authorisation code field is blank, retailers would need to assure themselves that consent has been appropriately provided. However, it is not clear how retailers are expected to do this. We would appreciate further guidance on this. • The customer authorisation code is proposed to be optional. Optional codes create two verification paths. Retailers must handle coded and uncoded requests. Authority letters vary by requester and rarely include a code. The registry process is also meant to be machine to machine. This approach risks creating significant requirements to employ manual workarounds which will reduce the speed and efficiency of these processes and place additional compliance costs on retailers. • Under this proposed process, consent becomes a complex thing to manage. A retailer will need to record codes, validate them, and track the 24 month expiry. We receive more than 300 EIEP13C files a month, many with multiple ICPs. This would create a significant ongoing cost. • The specification has gaps. The authorisation consent field (yes or no) has no stated outcome for 'no'. We would expect a rejection. The draft also does not cover an unrecognised code. As noted above, the code is 20 characters in some request definitions and 36 in the responses, for both 13C and 14C.
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?	We agree it makes sense to have a consistent approach between EIEP13s and EIEP14s.
Q7. Do you agree with our proposal for EIEP14C to support both JSON and CSV formats? If not, why not?	No, we consider only the CSV format should be allowed. We are not currently able to support JSON and providing for this would require significant development work. If the Authority does choose to allow for both file formats, it should be clear whether JSON is voluntary or

	mandatory and how a retailer should treat a request for data in JSON format that it cannot process.
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?	We are not currently able to support JSON. We expect providing for this would take a reasonable time given it would have to be considered amongst the significant wider compliance and implementation programmes underway.
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?	We do not consider a field should be included to allow the requestor to nominate the file format. CSV should be the default and only format.
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?	In general, alignment of data standards will help reduce development costs.
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?	Provision of information directly to a consumer in the EIEP14B format should only be required if the consumer specifically requests it. CSV files are difficult for most consumers to read. We expect a more user-friendly format will better meet the consumers need. We also note that consumers can already use My Account, Powerswitch, and Billy to access information about their current plan. Including EIEP14B formatted data when the consumer has not requested it risks creating confusion. This could be reviewed at a later date if the Authority was concerned this would not meet consumers needs.
Q12. Do you believe this proposal would ensure consumers are provided with the necessary information to compare electricity plans?	The best way to ensure consumers are provided with information they can use is to do so in a format that is user-friendly and human-readable. Providing EIEP14B formatted data directly to the consumer will generally be of little value.
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, it is sufficient, subject to our other comments.
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, we disagree. Implementation of both EIEP13C and EIEP14C will require system development. These changes come on top of significant system changes already underway to implement a raft of other new requirements, including those relating to mandating of other EIEPs. All of these changes need to be scoped, prioritised and scheduled. Additional complexity arises for Mercury as we operate multiple billing systems. With final decisions on EIEP13C and EIEP14C not expected until late October, and taking into account a change freeze period over the Christmas break, we suggest an implementation timeframe of six months from the final decision would be reasonable.
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?	As noted above, implementation of EIEP13C and EIEP14C will require system development but it is difficult to determine the scope and scale of this until the requirements are finalised. Mercury has not yet been able to assess this, but our expectation is it will be material and not achievable by the end of October.
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?	One option would be to postpone implementation of EIEP13A, EIEP13B, and EIEP14B until such a time that EIEP13C and EIEP14C can also be implemented. As noted above, we consider a reasonable timeframe for this is six months from the Authority's final decision.

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?	We generally agree that EIEP13C and EIEP14C will support informed consumer choice. However, the Authority should provide sufficient time for implementing these new formats to ensure the introduction goes smoothly.