8 October 2026

Submissions
Electricity Authority

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

Improving product and consumption information exchange – electronic request form, EIEP13C and EIEP14C

Meridian appreciates the opportunity to provide feedback on the Authority's consultation paper on changes to mandatory Electricity Information Exchange Protocols (EIEP) used to request electricity product and consumption information.

Meridian has read and broadly agrees with the submission made by the Electricity Retailers' and Generators' Association of New Zealand (ERGANZ).

Meridian understands the proposals in the consultation paper are part of an existing work programme to regulate EIEP14 and modernise EIEP13. However, the implementation timeframes for the package are concerning. The implementation date should allow sufficient time for retailers to receive a final decision, including final agreed versions of EIEP13C and EIEP14C and procedures documents before developing process changes to implement that decision. The proposed timeframes appear to be far too compressed and may require retailers to carry out development work ahead of final decisions and visibility of the full package. That would not be reasonable. Meridian requests an implementation date for the changes to EIEP13C and 14C no earlier than 1 April 2027.

Meridian agrees that access to accurate, timely data can enable consumers and authorised third-party service providers to use tools and services that support smarter energy choices and improved affordability. However, we are concerned about the cost and regulatory duplication that is emerging between the Part 11 of the Code (including the EIEP formats) and the Open Electricity regime.

Under Open Electricity retailers must provide customer and product data to accredited requestors from as early as 1 July 2027. The Authority proposes that retailers implement new EIEP formats from 30 October 2026, which operate for only a few months before a better API channel is implemented for the exchanging the same data. Meridian does not consider investment in file-based request mechanisms to be the best use of the sector's resources, especially given existing pressures such as the upcoming "better billing" changes, switching reforms, and implementation of Open Electricity itself.

In Meridian's opinion the costs of implementing the proposed changes to file-based information exchange processes will exceed any benefits to consumers given the likely short timeframe over which any benefits might accrue. Meridian also receives a very small number of requests, for example around five requests for EIEP14A per year. This limited uptake further evidences the lack of likely benefits associated with these changes.

Appended are Meridian's responses to the consultation questions.

Please contact me if you have any queries regarding this submission.

Nāku noa, nā

Sam Fleming
Head of Regulatory Affairs

Appendix: Responses to consultation questions

Questions	Comments
Q1. Do you agree with the proposed changes/updates to EIEP13C? If not, what would you change?	The new filtering fields (request dates, meter channels and reactive energy) are requests to which a retailer need not respond. In Meridian's opinion these additions increase complexity for requestors and will not be used by retailers. It would be simpler not to include them.
Q2. Do you agree with these changes also being reflected in the proposed EIEP14C where indicated? If not, what would you change?	Including a start and end period for an EIEP14B request is inconsistent with the information required to be provided. Meridian's understanding is that the Code only requires retailers to provide information about a customer's current plan for an ICP. Therefore, an EIEP14C request should only ever be sent to the customer's current retailer for information about the current plan applicable to their ICP (not plans they have been on in the past or a plan a former customer was on). Therefore, a date range applicable to the request is unnecessary in Meridian's opinion.
Q3. Do you agree with our proposal for EIEP14C to only request EIEP14B files? If not, do you think adding the capability for EIEP14C to also request EIEP14A files would be worth the complication of the file format?	Yes, Meridian agrees with limiting EIEP14C to EIEP14B requests. EIEP14B contains customer-specific information and is the primary use case for an authorised request process. Adding EIEP14A would increase complexity and has no benefit. Further, EIEP14C should be the only mechanism to request EIEP14B. We disagree that there is benefit in providing plan information to consumers in EIEP14B format.
Q4. Do you agree with our proposal not to include an automatic electronic authorisation consent system within the EIEP14 suite?	Yes. An electronic consent system within the EIEP suite would duplicate the accreditation and consent framework MBIE is building for Open Electricity, and retailers would incur additional compliance costs. See also Meridian's comments in the body of this submission.
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?	Meridian does not use authorisation codes but is comfortable with inclusion of this mechanism provided it is an optional field (i.e. only included if the retailer has agreed an authorisation) code. Both C files formats should include a statement that written authority has been obtained by the agent as this is what Meridian relies on currently.
Q6. Should the authorisation code and statement of written authority be common between EIEP13s and	See above. Meridian does not have a strong opinion on this question given it does not use authorisation codes.

Questions	Comments
EIEP14s? If so, should this be made explicit within the C formats?	
Q7. Do you agree with our proposal for EIEP14C files to support both JSON and CSV formats? If not, why not?	It is not clear how this would operate in practice, for example whether a retailer could ignore a JSON formatted request if it was not set up to receive it. Enabling JSON would seem to require the same retailer development effort as making JSON the default request format. Meridian supports continuing to use current systems with CSV formats.
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?	Meridian can receive JSON but queries whether this should be implemented for EIEP14C requests until the sector has greater clarity about whether these file-based transfer mechanisms will endure after the introduction of Open Electricity.
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?	Meridian supports continuing to use current systems with CSV formats. Meridian does not think retailers should be required to provide responses in a format specified by requestors until the sector has greater clarity about whether these file-based transfer mechanisms will endure after the introduction of Open Electricity.
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?	Unclear at this stage. It's hard to automate the information requested in both 4.29 (a) and (b).

Questions	Comments
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?	Meridian agrees with ERGANZ that most consumers who contact their retailer about their plan want to understand it rather than receive a data file. This should be a plain-language description of a plan by default for customers rather than a data file. Retailers should provide the EIEP14B file if requested but not provide it by default.
Q12. Do you believe this proposal would ensure consumers are provided with the necessary information to compare electricity plans?	No, the proposal itself does not enable consumers to compare electricity plans. It provides the data relating to their energy plan and consumption details. For a consumer to compare electricity plans they would need to evaluate whether their historical data reflects future consumption and all other plans that are currently available on the market.
Q13. Is the proposed EIEP14C request sufficient for third parties to electronically request EIEP14B files? If not, what would you suggest to achieve this?	Third-party requestors are best placed to answer this question.
Q14. Do you agree with the Authority's view that implementation of EIEP13C and EIEP14C would be straightforward, for the reasons given above? If not, why not?	We do not necessarily agree that implementation will be straightforward. While the proposed formats build on existing processes, implementation extends beyond system changes and will require updates to operational processes, staff training and customer service awareness to ensure requests are identified, validated and responded to within required timeframes. In addition to difficulty, there are issues with timing and value as noted in the body of this submission. The electronic request mechanism for EIEP14B specifically is fundamental and should have been finalised much earlier. The process has been rushed by the Authority and the timeframe proposed for implementation are insufficient.
Q15. What additional development effort is required to be able to process EIEP13C and EIEP14C requests beyond what has already been done to implement EIEP13A, EIEP13B, EIEP14A, and EIEP14B, if anything?	EIEP14C represents a new requirement rather than an enhancement to an existing process. Implementation is therefore likely to require the development of new processes and controls, along with staff training and awareness activities to ensure requests are correctly identified, validated, and completed within the required timeframes. Similarly, changes to EIEP13C are also expected to require process updates and staff training to support consistent implementation and compliance.

Questions	Comments
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?	Staged implementation would mean no formal and consistent way for EIEP14B to be requested by a third party. The Code does not require an agent to use the EIEP system to request information, a request can simply be emailed. The risk for retailers is that it is more difficult to identify and act on these requests if they are buried amongst more general queries. Compliance with the response times in the Code would become more challenging if emails are used more in any interim 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?	Provision of data does not equate to plan comparison or an efficient and competitive market. EIEP13C and 14C are a method of requesting the data, not an end use for that data. Meridian agrees with ERGANZ that the Authority should consider the efficiency and proportionality of the proposed EIEP package of changes given the upcoming implementation of Open Electricity and potentially very short life span for the amended processes.