Appendix D – 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

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Questions	Comments
Q1. Do you agree with the proposed changes/updates to EIEP13C? If not, what would you change?	Nova considers that the proposed changes to EIEP13C should be reconsidered and that a mandated EIEP14C request format is unnecessary, particularly given the Authority's statement that requests for product information can be completed without the C protocols. Nova prefers to continue using existing processes and pathways to receive requests from customers and authorised agents, while providing response files in the confirmed EIEP13A/B and EIEP14A/B formats. Consistency of electronic response formats is more important than mandating electronic request formats that may soon be duplicated or superseded by Open Electricity. If the C-format proposals proceed, Nova supports JSON, ISO 8601 formatting and aligned fields, subject to final schemas, validation artefacts and worked examples being available before implementation.
Q2. Do you agree with these changes also being reflected in the proposed EIEP14C where indicated? If not, what would you change?	No. Nova does not consider a mandated EIEP14C request format necessary at this time because requests for product information can be completed without the C protocols. Nova prefers to use existing processes and pathways to receive requests from customers and authorised agents and to provide responses using the confirmed EIEP14A/B formats. If EIEP14C nevertheless proceeds, shared fields, terminology, authorisation requirements and JSON structures should align with EIEP13C wherever there is no substantive reason for a difference.
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?	If EIEP14C proceeds, Nova agrees that it should be limited to requesting EIEP14B files. EIEP14A information is publicly available, and adding the capability to request it through EIEP14C would increase complexity without a clear corresponding benefit. This conditional support does not alter Nova's view that a mandated EIEP14C request format is unnecessary.
Q4. Do you agree with our proposal not to include an automatic electronic authorisation consent system within the EIEP14 suite?	Yes. Nova agrees that building a separate real-time consent system now would risk duplicating Open Electricity requirements. Existing authorisation processes should continue in the interim, with any more advanced consent solution aligned to Open Electricity.
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?	No. Nova does not support the proposed authorisation-code mechanism in its current form. The proposal does not clearly address whether separate codes would apply to EIEP13C and EIEP14C, the activities for which a code may be used, the duration of authority, or the controls for expiry, revocation and misuse. Without these safeguards, the mechanism is potentially insecure and does not provide a sufficiently robust basis for evidencing customer consent.

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?	If an authorisation-code mechanism proceeds, a single code and statement of written authority should apply across the EIEP13 and EIEP14 suites and this should be explicit in both C-formats. Requiring separate codes would duplicate consent records and validation processes. The procedures must also define the activities covered by the code, whether it may be used for any other purpose, its period of validity, and the controls for expiry, revocation and misuse.
Q7. Do you agree with our proposal for EIEP14C to support both JSON and CSV formats? If not, why not?	If EIEP14C proceeds, Nova supports JSON and CSV being permitted, but does not support requiring every retailer to build both formats. PEBS, Nova's WISE billing system, already has JSON capability. CSV capability could be developed, but doing so would require additional time, system development and implementation effort. Nova therefore prefers JSON to be used consistently and as the default, with CSV available for parties that already support it or choose to develop it.
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?	If EIEP14C proceeds, Nova is ready to support JSON through PEBS. Nova cannot comment on sector-wide readiness, but considers JSON the appropriate default for any C-format implementation because it aligns with Nova's existing system capability and modern machine-to-machine exchange. This does not alter Nova's view that use of the C-formats should not be mandatory.
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?	If both formats are retained, Nova supports a format-selection field. However, the field should express a preference rather than create an obligation to provide a format the retailer does not currently support. JSON should be the default, with the parties able to agree an alternative. Nova could develop CSV capability, but this would take additional time and work because PEBS already supports JSON but does not currently support CSV.
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?	Alignment should reduce development and ongoing support costs where common fields, schemas and validation rules are used. However, Nova already needs processes to receive, verify and action customer and agent requests and to provide the relevant EIEP13A/B and EIEP14A/B response files. The key issue is that mandating revised EIEP13C and new EIEP14C request formats would unnecessarily add both manual and digital work to those existing processes, including request intake and routing, consent and code administration, exception handling, and system integration. JSON itself is not the principal issue because PEBS already supports JSON. CSV could be developed, but would require additional time and work, while duplicate formats and interim authorisation functionality that may be replaced by Open Electricity would create avoidable cost.
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?	Potentially. A direct consumer request may arrive through channels that are not integrated with structured EIEP processing. The procedures should preserve practical customer-service channels and clarify that the substantive EIEP14B information must be provided without requiring the consumer to submit a technical EIEP14C file. Implementation should not require disproportionate channel or system changes.
Q12. Do you believe this proposal would ensure consumers are provided with the necessary information to compare electricity plans?	Only in part. Providing the prescribed EIEP14B data in a clear and understandable form should give consumers the information needed to compare electricity plans. However, that outcome does not depend on mandating EIEP14C because requests can be received through existing customer service channels. The Authority should monitor whether the information is usable in practice and avoid requiring duplicate outputs where the same information can be presented efficiently.
Q13. Is the proposed EIEP14C request sufficient for third parties to electronically request	Not necessarily. Third parties can request EIEP14B information through existing processes and pathways without a mandated EIEP14C format. Nova considers that consistent electronic response formats are more important than prescribing an electronic request file. If EIEP14C proceeds, final JSON

EIEP14B files? If not, what would you suggest to achieve this?	schemas, validation rules, error-handling expectations, worked examples and clear procedures would be required, together with flexibility for parties to agree transport and format arrangements where permitted.
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. Although the C-formats build on existing EIEPs, implementation would not be straightforward for Nova. Nova already needs to maintain practical processes to receive, verify and action requests for consumption and product information through existing customer-service channels. The proposed revised EIEP13C and new EIEP14C formats would unnecessarily increase both the manual and digital work required to action those requests, including request routing, consent and authorisation-code administration, exception handling, Salesforce configuration, new data fields and outputs, channel integration, and Call Centre process changes. Developing interim functionality also risks stranded investment if Open Electricity introduces different requirements.
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?	Nova anticipates material additional work beyond the A and B formats. Existing customer-service processes can receive and action requests, but mandating revised EIEP13C and new EIEP14C files would require additional manual and digital capability to log and route structured requests, verify the customer and the scope and duration of consent, issue and record authorisation codes, manage exceptions, and integrate request channels with Salesforce and Call Centre processes. Nova has not yet quantified this effort. PEBS already supports JSON. CSV capability could be built, but would require additional development time and implementation work. This investment may be short-lived if Open Electricity adopts different consent, security or time-to-live requirements.
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?	A gap should be manageable because the C-formats are request mechanisms rather than the only means of requesting information. Any transition issues can be mitigated through clear interim guidance, continued use of existing request channels and direct engagement between requestors and retailers. If the C formats proceed, the Authority should provide a reasonable implementation period, but Nova does not consider that use of the C formats should be mandatory.
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?	Only to a limited extent. Standardised response formats can support informed consumer choice by improving the accuracy and consistency of plan-comparison information. However, Nova does not consider that mandating revised EIEP13C and new EIEP14C request formats is necessary to achieve that benefit because requests can be received through existing channels. Requiring the C formats would add avoidable manual and digital work and may create duplicate or stranded investment ahead of Open Electricity.