

Appendix A Format for submissions

Submitter	David Hingston
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Questions	Comments
Generally	<p>As an engaged and technically informed consumer, I have previously corresponded with the Electricity Authority on and around this topic, that I considered has not been sufficiently recognised by the Authority or related parties.</p> <p>This included, on my own initiative, submitting a proposal for a Code amendment to address an issue I felt was under-recognised.</p> <p>My proposal received a formal assessment and was acknowledged by the Authority as potentially valuable to consumer outcomes.</p> <p>However, despite this recognition and an indication that further analysis would be carried out, neither the code change I suggested nor the assessment of it does not appear to be sufficiently reflected or referenced in the current consultation material.</p> <p>It is not prudent for me to continue providing extensive, unpaid input. Should there be an opportunity for funded engagement, I would be open to participate further. Otherwise, I am not willing to restate my points on an unfunded basis.</p>
Q1. Do you agree that improving access to product data will support consumer mobility through enabling innovation and informed choice?	

Q2. Are there any other aspects of improving access to data that the Authority should be considering? Are there further benefits that we have not articulated?	
Q3. Do you agree that creating standards for the exchanging of product data should be aligned with a potential future electricity Consumer Data Right (CDR)? Why, or why not?	
Q4. Are there additional opportunities or risks the Authority should consider in aligning improved access to electricity product data with a potential CDR designation and implementation?	
Q5. Do you have any views on the interaction between the definitions of “generally available retail tariff plan” within the Code and “product data” within the CPD Act? Are these definitions easily reconciled? Do they capture the same information?	
Q6. Do you agree that the current data access arrangements (eg, clause 11.32G, non-regulated EIEP14 and bilateral agreements) are no longer fit for purpose to promote a digitalised electricity industry that enables the on-demand sharing of electricity information?	
Q7. Have you encountered specific operational or compliance barriers when trying to access or share product data?	
Q8. What are the most significant friction points for consumers when comparing and switching electricity plans today?	
Q9. How would better access to standardised and on-demand product	

data improve outcomes for consumers and/or your organisation?	
Q10. Do you agree with the proposed assessment criteria (effectiveness, efficiency, feasibility, and strategic alignment)? Are there other criteria we should consider?	
Q11. Do you have a view on which option (status quo, regulated EIEP14, new modular EIEPs) would deliver the most benefit and why?	
Q12. Do you agree with our preliminary assessment of the options presented above?	
Q13. Are there elements of the existing EIEP14 that could be adapted or strengthened rather than replaced?	
Q14. Are there any other barriers to using EIEP14 that we have not identified?	
Q15. If option 3 (new modular EIEPs) is pursued, how should we best sequence implementation to ensure deliverability and minimise disruption?	
Q16. If option 3 is pursued, do you think the proposed EIEP14B (all electricity plans) should capture historic offers to capture all current and legacy plans?	
Q17. If option 3 is pursued, are there practical limitations the Authority should consider? (For example, should plans that have no active customers, or highly specialised plans such as internal staff discounts, be included?)	
Q17a. If limitations are appropriate, how should these be defined to ensure the protocol remains comprehensive and	

useful for consumers and third-party service providers?	
<p>Q18. What practical limitations (if any) should apply to third-party requests for tariff data?</p> <p>Q18a. Do you think any interim measures should be considered as part of the new protocols, to facilitate the transition to the on-demand access to product data? If so, what are your suggestions?</p> <p>Q.18b. What additional provisions are needed to maintain data continuity during retailer exits, mergers, or other significant business changes?</p>	
<p>Q19. Should each electricity plan be required to have a unique identifier to help consumers and third parties distinguish between plans with the same or similar names?</p> <p>Q19a. If yes, how should the unique identifier system be designed and administered to ensure that is practical, consistent and does not add unnecessary compliance costs?</p>	
Q20. Do you have any feedback on how these new protocols could be implemented?	
Q21. What are the likely implementation costs (systems, processes, resourcing) for your organisation, and how could these be minimised?	
Q22. What support, if any, would you find helpful during implementation (eg, technical guidance, test environments)?	
Q23. What compliance or assurance mechanisms (beyond Code compliance	

monitoring) would support effective data quality and adherence?	
Q24. How would you like to be involved in co-designing the new product data protocols? Are there any specific parties that the Authority should be consulting with to help design these protocols?	
Q25. Are there specific technical standards, platforms, or international practices the Authority should consider in designing API-based access?	
Q26. Do you have any feedback on the proposed implementation timeline, or additional risks or dependencies we should factor in?	