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Electricity Authority  
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## **Enabling consumer mobility by improving access to electricity product data**

Meridian welcomes the opportunity to comment on the Electricity Authority's consultation paper on improving access to electricity product data. We support the Authority's intent to improve transparency and empower consumers, and we recognise the potential benefits of more accessible and standardised product data.

This submission outlines Meridian's views on:

- The current state of product data sharing and its limitations.
- The importance of balancing innovation with market complexity.
- Risks associated with third-party access and data accuracy.
- Specific feedback on proposed protocols, including plan identifiers, eligibility criteria, and treatment of legacy and consumer-specific plans.

## **Current settings and the context for change**

### *Fairness and comparability challenges*

Comparing electricity plans across customers is inherently complex due to many factors, including location, usage patterns and eligibility criteria. The locational nature of the electricity market in New Zealand means that some retailers may prefer to target their offerings in certain

geographic locations, or to certain customer segments. The implication of this is that not all plans will be available to all customers. Without accounting for these variables, comparison and switching advice may be misleading or oversimplified, and may waste consumers' time.

#### *There are practical challenges with the status quo (EIEP14)*

Meridan's experience with the current voluntary data sharing protocol, EIEP14, is that it is ill-suited to the current market environment. The format is cumbersome and requires manual effort to populate and maintain. It does not handle complex or tailored pricing structures (such as seasonal pricing) very well.

Our experience is that third party websites offering comparison and switching services for electricity consumers frequently make mistakes or misrepresent plans. We think that there is scope to improve the accuracy of this process through a better data sharing protocol.

### **Innovation and complexity**

#### *Diversity of plans in the market and complexity*

The New Zealand electricity market is characterised by high levels of competition, with around 40 electricity retailers each offering a wide range of plans. The number of plans and the diverse range of offerings reflects innovation and competition (as well as the doubling of plans necessitated by the Electricity (Low Fixed Charge Tariff Option for Domestic Consumers) Regulations 2004). While this diversity also can result in complexity, this is not necessarily a negative. However, this does highlight the need for well-designed data sharing protocols that can accommodate a variety of pricing structures and eligibility criteria.

#### *A need for flexible and evolving data formats*

Any new data-sharing format must be capable of evolving alongside the market. As retailers continue to develop new pricing models, such as time-of-use, seasonal, or bundled/unbundled service plans, the format used to share this data needs to be adaptable over time. A rigid or overly prescriptive protocol could constrain innovation, and also reduce the usefulness of switching and comparison services. Meridan's view is that the Authority should build flexibility into the design of the new data sharing framework, and allow for iterative updates and ongoing input from the industry.

## Ensuring accuracy in product data and managing the risks of sharing data

### *Reputational risks to the sector*

Meridian's view is that accuracy in comparison and switching advice is essential for ensuring that customers have a good experience, and for the reputation of the electricity sector.

Retailers commonly develop product offerings and marketing strategies tailored to specific customers, regions and network conditions. When third parties present outdated or misaligned information, such as legacy plans or terms that are not offered in certain areas, it leads to consumer confusion, increased costs to manage enquiries, misinformed switching decisions, and erosion of public trust in the electricity sector.

One way to manage these risks would be for the Authority to produce guidance for comparison and switching services about interpretation of product data.

### **Specific areas for feedback**

Meridian also has several specific points to make:

- **Unique plan identifiers:** we agree that unique identifiers could improve data accuracy and therefore the switching process.
- **Criteria for plan eligibility:** we think that it is important that data sharing protocols also include customer eligibility rules (for example, location or usage profile) and that third-party providers have an obligation to present this information to their users.
- **Terms and conditions:** we think that data sharing protocols also include relevant terms and conditions.
- **Carve-outs from EIEP14-B:** we strongly recommend that consumer-specific discounts are excluded from the plans that will need to be shared under this protocol. Sometimes retailers will partner with other retailers (for example, Farmlands) to offer discounts, or offer special pricing or plans through events (for example, Fieldays). Where these sorts of plans are not offered more generally to customers, they should be excluded from the information sharing protocols. Presenting them as being available when they are not, is confusing to consumers and erodes confidence in retailers and in the sector. Meridian also recommends that staff plans are excluded from the information sharing protocols, given that they are not available in the market.

- **Treatment of legacy plans in EIEP14-B should be clear:** there is a need for clear definitions and treatment of legacy plans in the information sharing protocol. Meridian's view is that retailers should have discretion over which plans are marketed and promoted to consumers. Including legacy plans in the protocol risks misleading consumers and wasting their time investigating plans and options that are not realistically available to customers. In general, the development of EIEP14-B and decisions around what information to include in the new information sharing protocol should be informed by the problem definition and the outcomes the Authority is trying to achieve with these changes.

### **Concluding remarks**

This submission is not confidential and can be released in full. I can be contacted to discuss any of the points made.

Nāku noa, nā



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## Appendix A: Responses to consultation questions

#	Question	Response
<b>Questions on the Authority's vision</b>		
1	Do you agree that improving access to product data will support consumer mobility through enabling innovation and informed choice?	Meridian agrees that improving access to product data can support consumer mobility. However, we believe this must be balanced with ensuring data accuracy and relevance, particularly given the complexity of electricity plans and the diversity of consumer needs.
2	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?	The Authority should consider the reputational risks to retailers (and the wider sector) from inaccurate data presentation, and the potential for consumer confusion when plans are misrepresented or outdated.
3	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?	Yes. It is essential that the new information sharing protocols are aligned with the proposed CDR designation for electricity. It is clear from the consultation that the Authority is aware of the potential for confusion and we are encouraged that the regulator is working closely with MBIE on this.
5	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?	These two definitions are different in that section 9 of the CPD Act appears to be a wide definition, whereas "generally available retail tariff plan" is has the limitation of "generally available". Our view is that plan information being shared under the new protocols must be "generally available". Retailers should have the commercial and operational flexibility to tailor and offer plans in ways that suit the retailer's goals, and it is not appropriate to present consumers with information about plans that are not realistically available to them, when they are making comparisons and considering switching.
6	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?	Yes. Meridian's experience is that EIEP14 is cumbersome and ill-suited to the current market. It does not handle complex pricing structures well and is often misrepresented by third-party websites.
7	Have you encountered specific operational or compliance barriers when	Yes. The manual nature of EIEP14 and the lack of standardisation create operational burdens. Additionally,

	trying to access or share product data?	inaccuracies in third-party use of the data have led to customer complaints and reputational issues.
8	What are the most significant friction points for consumers when comparing and switching electricity plans today?	Consumers face challenges due to plan complexity, eligibility criteria, and geographic limitations. Misrepresentation of plans by third parties also contributes to confusion and poor switching experiences.
11	Do you have a view on which option (status quo, regulated EIEP14, new modular EIEPs) would deliver the most benefit and why?	Meridian supports the development of a new modular EIEP framework, provided it is flexible, adaptable, and designed with input from industry. This approach is more likely to accommodate innovation and diverse plan structures.
16	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?	Meridian does not support the inclusion of legacy plans that are no longer marketed. Including outdated plans risks misleading consumers and undermines the effectiveness of switching tools.
17	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?) Q17 a . If limitations are appropriate, how should these be defined to ensure the protocol remains comprehensive and useful for consumers and third -party service providers?	No. Plans with no active customers or those offered only to specific groups (e.g., staff discounts or event-based promotions) should be excluded to avoid confusion and ensure relevance.
18	Q18. What practical limitations (if any) should apply to third -party requests for tariff data ? 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? Q.18b. What additional provisions are needed to maintain data continuity during retailer exits, mergers, or other significant business changes?	18a: yes. Meridian supports interim measures to reduce disruption and allow retailers time to adapt systems and processes.

19	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? 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?	19: Yes. Unique identifiers would improve data accuracy and help consumers and third parties distinguish between similar plans.
20	Do you have any feedback on how these new protocols could be implemented?	Implementation should be phased and supported by technical guidance. We suggest allowing for ongoing industry input.
21	What are the likely implementation costs (systems, processes, resourcing) for your organisation, and how could these be minimised?	Implementation costs could be significant due to system updates and staff training. These could be minimised through clear guidance, test environments, and a phased rollout.
22	What support, if any, would you find helpful during implementation (eg, technical guidance, test environments)?	Technical documentation, test environments, and early engagement with retailers would be helpful.