

Appendix A Format for submissions

Submitter	SEANZ Manager Innovation Pathways Gareth Williams
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Questions	Comments
Q1. Do you agree that improving access to product data will support consumer mobility through enabling innovation and informed choice?	Yes, data access is key to decision making, but the scope of consumer mobility is too narrow as described in Q2 answer below. Product data is also only useful if there is similar easy, standard and electronic access to meter data which enables calculation of costs under different products.
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?	Access to data should not only be considered with regards to customers switching retailers but to all customer energy decisions, including opportunities for energy efficiency or investing in alternative energy systems such as solar and battery storage.
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?	Yes – makes sense (i.e. why do anything different)
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?	No view
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	No view

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?	Yes, these clauses are outdated
Q7. Have you encountered specific operational or compliance barriers when trying to access or share product data?	Members of SEANZ have requested EIEP12 files from EDB's to help efficiency in loading tariff data into solar modelling tools and have been refused on the basis that they are not retailers and therefore don't have an agreement with the EDB. Electronic, structured data of EDB network tariffs is however useful to solar designers and the reason for decline is not clear given the file already exists and contains no confidential information.
Q8. What are the most significant friction points for consumers when comparing and switching electricity plans today?	Access to half hour consumption data to allow analysis of benefits of energy options
Q9. How would better access to standardised and on-demand product data improve outcomes for consumers and/or your organisation?	Faster and more accurate assessment of solar and battery storage value to customers, together with analysis of the best post solar grid plan for customers.
Q10. Do you agree with the proposed assessment criteria (effectiveness, efficiency, feasibility, and strategic alignment)? Are there other criteria we should consider?	Yes agree
Q11. Do you have a view on which option (status quo, regulated EIEP14, new modular EIEPs) would deliver the most benefit and why?	No view – other than EIEP12 files should also be made freely available to parties without a direct contract with the EDB

Q12. Do you agree with our preliminary assessment of the options presented above?	No view
Q13. Are there elements of the existing EIEP14 that could be adapted or strengthened rather than replaced?	No view
Q14. Are there any other barriers to using EIEP14 that we have not identified?	No view
Q15. If option 3 (new modular EIEPs) is pursued, how should we best sequence implementation to ensure deliverability and minimise disruption?	No view
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?	Yes
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?)	If no active customers or not relevant to broader customer base then not relevant
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?	No view
Q18. What practical limitations (if any) should apply to third-party requests for tariff data?	No limitations at all. This information is not confidential
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?	No view

Q.18b. What additional provisions are needed to maintain data continuity during retailer exits, mergers, or other significant business changes?	No view
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?	That would seem logical
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?	No view
Q20. Do you have any feedback on how these new protocols could be implemented?	No view
Q21. What are the likely implementation costs (systems, processes, resourcing) for your organisation, and how could these be minimised?	No cost to SEANZ – should help with members efficiency
Q22. What support, if any, would you find helpful during implementation (e.g., technical guidance, test environments)?	A test environment would be very useful to enable
Q23. What compliance or assurance mechanisms (beyond Code compliance monitoring) would support effective data quality and adherence?	No view
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?	Just informed with opportunity for feedback on key decision points.
Q25. Are there specific technical standards, platforms, or international	I am sure there are – but not area of expertise

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?	Proposed timeframe seems reasonable, although it is not clear what would be available within 6 months of code amendments. Online digital, automated processes needs to be the objective