

26 March 2026



2degrees supports the EIEP14A Proposal to improve consumer access to retailer product information.

2degrees welcomes the opportunity to comment on the EIEP14A – Retailer Product Information proposals.

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2degrees is supportive of the EIEP14A proposal overall and supports the intent to empower consumers with better information.

We agree that the provision of clear and standardised product information can empower customers and stimulate retail competition by reducing switching friction and ensuring a single consistent regulated format for exchanging plan information.

Targeted Regulation, reasonable Implementation Timelines and cumulative effects

2degrees believes that any new regulation should be targeted and proportionate to the problem it seeks to solve and that it is essential that industry participants are afforded appropriate timeframes to enable effective implementation of changes required by new regulatory requirements.

The Authority should be mindful of the cumulative impact of multiple regulatory changes required by recent and current regulatory Decisions, such as the Better Billing Decision, as the workload created by the volume of changes can be substantial. An unintended consequence of over-regulation in the retailer sector could be further retailer withdrawal from the electricity market, resulting from unmanageable regulatory burdens.

Wholesale Market Effectiveness and Retail Regulation

As previously highlighted, 2degrees strongly believes that effective settings in the wholesale energy market would allow competitive forces to deliver better outcomes for consumers, reducing the need for heavy-handed retail regulation. The Authority's approach to retail, which increasingly relies on detailed rules, appears inconsistent with the principles-based method used for wholesale market initiatives, such as the approach to non-discriminatory obligations improvements. 2degrees encourages the Authority to focus on efforts that address wholesale market competition and cost drivers, as these have the most direct impact on lowering power prices for consumers. If wholesale market settings are correct, competitive pressure will naturally improve outcomes in the retail sector, diminishing the necessity for prescriptive regulation.

We encourage the Authority to remain mindful of this broader context when finalising this proposal. Our responses to specific consultation questions are below in Appendix 1.

Appendix 1 – 2degrees’ specific consultation question responses

Consultation Question	2degrees’ Response
Q1. Do you agree with the preferred format option (Option 1 vs Option 2)? <i>(Enhanced new EIEP14A format vs incremental update of the old format)</i>	Yes. 2degrees supports the Authority’s preferred Option 1. In our assessment, Option 1 and Option 2 are equivalent in implementation effort for our systems. Given that, we favour adopting the more future-proof, structured format (Option 1) that the Authority has designed. Option 1’s approach (using Tariff Type/Region objects to reduce duplication) should make data clearer and reduce long-term maintenance. Crucially, we welcome the move to a regulated standard format under the Code – this ensures all retailers use one format, avoiding the need to accommodate multiple data formats for different third parties. Overall, we have <i>no objection</i> to the changes to EIEP14 and agree with establishing a single, mandated schema for product information.
Q5. Have we identified all the required attributes in the new EIEP14A? <i>(Are additional data fields needed, e.g. for fees or plan features?)</i>	Add granularity for Disconnection/Reconnection fees. We agree with the listed attributes but suggest a refinement. The protocol currently has a single category each for reconnection fee, disconnection fee (for non-payment), and disconnection fee (customer request). In practice, the costs differ significantly based on timing and method – for example, an after-hours disconnection or reconnection versus one during business hours, and a remote (smart meter) service versus a manual site visit. We recommend expanding these attributes (or adding flags) to distinguish After-hours vs. Normal-hours and Remote vs. Manual disconnections/reconnections to reflect industry practice. These distinctions reflect materially different input costs and would better align with the Consumer Care Guidelines’ intent to ensure fees are reasonable and transparent.
Q8. Do you agree with our assessment regarding plan features with undisclosed monetary value? <i>(EIEP14A will note if a plan includes perks like free hours or devices, but won’t assign them a dollar value.)</i>	Partially agree. We accept that quantifying the dollar value of non-price features (e.g. a free appliance, loyalty rewards) can be complex and potentially misleading, so the protocol’s approach to simply flag the presence of such features is reasonable for now. We note the challenge that this approach may cause with any campaigns that provide high-value hardware or credits (for example, a discounted smart home device or a significant bill credit) and/or where products are bundled with other services or equipment supply that are offered as a loss leader or heavily discounted, and the “undisclosed value” of those incentives might materially affect a plan’s attractiveness. In such cases, not reflecting any value could make comparisons harder.
Q15. Do you have any other comments on the proposals (e.g. implementation timing or broader context)?	Implementation timeline and regulatory focus: We note that the Code amendment is set to take effect in October 2026, which is a tight timeframe for building and testing the necessary systems. 2degrees is already navigating multiple regulatory changes, so we urge the Authority to be realistic about industry capacity and to offer flexibility or support if needed. The retail electricity market outcomes are ultimately tied to the health of the wholesale market.