

Electricity Authority Te Mana Hiko
PO Box 10041
Wellington 6143

Via email: consumer.mobility@ea.govt.nz

25 March 2025

To whom it may concern,

Thank you for the opportunity to provide feedback on the Authority's consultation on Electricity Information Exchange Protocol 14A. We support the Authority's efforts to improve the electricity market for consumers.

We believe that standardising retailer product information is a necessary and key prerequisite for Consumer Data Right.

Our view is that EIEP14A should only cover currently available tariffs. Consumers can see what rates they are currently on from their bill and most of the comparison sites now have a bill upload feature which can ingest these rates and compare them to the currently available plans on the market. Incorporating legacy contracted products will be an extremely inefficient way of providing the information that will be delivered in EIEP14B.

For Octopus plans (under the current EIEP14A CSV format) including rates for all contracted legacy tariffs, increases the number of rows in the file from 9,996 to over 371,000. While there are some efficiencies from the new format, this delta between currently available plans and all contracted plans is likely to remain similar.

Aside from this we are in agreement with the proposals. Please see our responses to questions in the following table.

Kind regards,

Steve Young

Head of Data and Industry Operations

Questions	Comments
Q1. Do you agree with our preferred option (Option 1)?	Largely, yes. We believe only currently available plans should be included. Including legacy contracted plans is very inefficient and any short term value of this will be lost once EIEP14B comes into play. We would also prefer to settle on a single format, JSON, rather than allowing JSON or CSV.
Q2. Do you agree with the structural changes we propose for both options? If not, please explain why?	<p>Mostly, yes.</p> <p>Clearer definitions are needed to state which conditional fields can be NULL.</p> <p>NULL should be an acceptable value for all conditional fields where that field does not determine an ICP's eligibility for a given plan.</p> <p>For example, the Register Content Code and Period of Availability (RCC-POA) field says it can be NULL for "fixed charges or electricity conveyed charges (e.g. EA levy, meter lease charges)". We base pricing on a combination of Network and Price Category Code - RCC or POA do not matter to us. Rather than list all possible combinations we'd leave this as NULL.</p>
Q3. Are there any other structural changes you consider necessary to support the protocol achieve its objective?	No
Q4. Do you agree with our proposal to adopt the ISO 8601 date and date-time formats? Do you foresee this adoption impacting your use of other EIEPs in any way?	Yes
Q5. Have we identified all the required attributes to be added? If not, what are we missing?	Yes
Q6. Do you agree with the attributes we propose to introduce into EIEP14A? If not, please identify which attributes and explain why not, or what changes are required?	Mostly - it seems unnecessary or presumptive to add a MULTIPLE_TRADERS_ALLOWED field before any such trading rules are in place.
Q7. Do you consider the protocol adequately enables representation of feed-in tariffs for different generation types?	No response
Q8. Do you agree with our assessment of the limitation of EIEP14A to represent aspects of electricity plans with undisclosed values? Do you believe this limitation is adequately offset for the reasons outlined above? If not, please explain why.	No response
Q9. Do you agree with the proposal to modify the business requirement to provide the Authority a right of decline to any requests for additional attributes.	No response
Q10. Do you agree with the objective of EIEP14A as describe above? If not, why not?	We do not believe active legacy plans should be included in EIEP14A. The consumer's own current

	plan will be covered by EIEP14B. None of the other legacy plans will be available to the consumer - so including them serves no purpose and significantly impacts file sizes (e.g. under the current format would increase our EIEP14A file from 10K to 371K rows)
Q11. Do you agree that the Authority's proposals meet these objectives?	Yes
Q12. Have we identified all the main costs and benefits? If not, what are we missing?	No response
Q13. Do you agree the benefits of the proposed EIEP14A outweigh its costs? If not, why not?	No response
Q14. Do you agree the proposed preferred EIEP14A is preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010.	No response
Q15. Do you have any other comments?	No response