

Appendix D Submission form

Consultation for 'Improving product information and consumption data exchange – proposals for new and updated standards: EIEP14B, EIEP 13A and EIEP13B'

Please email your submission to consumer.mobility@ea.govt.nz by 5pm, Wednesday 24 June 2026.

Submitter	Contact Energy
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Questions	Comments
Q1. Do you agree that the proposed EIEP14B is consistent with the now prescribed EIEP14A? (If not, what further changes are required to achieve consistency?)	Yes, although it's not clear how much value there is in making the ICP's network supply point, distributor price category code and distributor loss category code mandatory in the EIEP14B. That data is in the registry already and people using the EIEP14B will presumably still need to query the registry to get other information that is relevant to pricing comparisons (e.g. they may need to know the ICP's chargeable capacity, daily unmetered kWh, etc). It's also important to note that the EIEP14A and product ID requirements are very new and many retailers are still trying to make the system changes required to implement the standards in practice. It seems likely that future changes will be required to the EIEP14A over the next 6-12 months as issues or complexities are identified, and these will presumably need to flow directly through to the EIEP14B at the same time to ensure the standards stay consistent.
Q2. Is the proposed EIEP14B design suitable to enable customers, or agents acting on their behalf, to acquire specific, accurate, unambiguous information on their electricity plan?	Yes, although the prescribed EIEP14B csv and Json formats aren't very accessible to non-technical people, limiting the pool of people likely to access the files directly. Presumably once the EIEP14C/CDR protocol is in place there will be online sites or resources to make the underlying data more accessible and user-friendly for a non-technical audience.
Q3. What additional changes to attributes, structure or content, if any, do you recommend to the proposed EIEP14B to achieve the above objective?	The date the customer joined the plan (StartDate) won't be known or relevant for many customers who have been on the same plan for years. We ask the Authority to make this information optional, or alternatively to provide guidance as to what value can be entered if the date is unknown. For example, the EIEP14A could allow the field to be "null if the start date is more than two years in the past."
Q4. Do you agree with the proposal not to include customer-specific attributes such as contact, meter configuration or billing information in EIEP14B, reflecting discussion at industry workshops?	Yes, although as noted in our response to Q1, it is not clear why the network supply point, distributor price category code and distributor loss code are mandatory in the EIEP14B.
Q5. Do you agree with the proposed key names within JSON objects in the EIEP13A and EIEP13B updates?	While we support the EA and industry move to real-time, machine-readable interfaces for consumer mobility and CDR, the proposed timeframe is not achievable for Contact given the delays in reaching this stage of the project. While several of the changes to EIEP13 are data standard hygiene or tidy ups, some more substantial and unnecessary changes have also crept in. The most significant change for us is the introduction of the JSON format which our native systems do not currently support. Contact was expecting a longer lead time, more aligned with the outstanding broader CDR technology and authorisation framework that is anticipated to be delivered in mid-2027. Further, including supplementary fields (Meter Channel and Tariff Name) seem to have very little value or benefit. In our view these are unnecessary changes that will drive further cost and complexity. This is particularly true for the recently introduced Tariff Name field, which has not been fully considered or defined, and is categorised as optional.

Q6. Do you agree with the proposal to minimise product information in the EIEP13 formats (such as making tariff name optional), reserving product information for the EIEP14 formats?	We agree that EIEP13 should remain a meter data or consumption-based protocol. (For the same reason, 'Tariff Name' should also be removed as this can carry a product element complexity).
Q7. Do the amendments to the Consumer Authorisation Code field clarify its use? If not, what further changes would provide clarification (eg would it be preferable to rename this field)?	It makes sense to have a consumer authorisation placeholder. However, this feels a little premature given that – to the best of our knowledge - the industry authorisation framework and solution have not yet been designed (or even blue printed).
Q8. Do the proposed updates adequately future-proof EIEP13A and EIEP13B so they provide sufficient information for foreseeable use cases?	As noted above, our view is that there are several related components that have not been finalised yet (e.g. the authorisation framework).
Q9. Does the way we have specified the meter channel and register content codes in EIEP13A, maintain consistency across EIEP13A, EIEP14B and the Registry information for the consumer's ICP?	It helps but does not solve the problem completely. Simply adding a Tariff Name and further definition does not solve the '100% alignment' challenge: there will always be differences in the way retailers consume and produce metering data, and differences in how MEPs configure meters and data streams.
Q10. Do you agree with the Authority's conclusion that, assessed against the criteria described in section 5.3 of the consultation paper, the proposals for the new EIEP14B and modernised EIEP13A and EIEP13B format will collectively support informed consumer choice by enabling more accurate and consistent plan comparison and a more efficient and competitive market?	The proposals may enable more accurate and consistent comparisons at a basic level. However, as outlined in our CDR MBIE response, we consider that this is very much a 'starting point' for the wider framework. The use cases are broad and extensive and cover complex industry segments where 'black and white' accurate or meaningful comparison outcomes are not always possible. Any ambitions outside of standard or general tariff comparisons (which will still contain significant challenges) will require significantly more interpretation, customised business rules and/or agent understanding to avoid unintended outcomes and the potential for customers to be misled.
Q11. Do you have further comment on whether the EIEP14B format proposals and EIEP13A and EIEP13B updates support informed consumer choice? Do they equip a third party, for example a (non-technical) budget advisor, with sufficient information to advise a consumer on their best plan options? If not, what would you change?	In our view there will likely be some success with comparison outcomes for agents and consumers. However, this will require substantial work to ensure like is compared with like, and to avoid unintended or misleading outcomes. As per our response to Q2, the formats of the EIEP13A/B and EIEP14B are not easily accessible for non-technical people. We assume that once the CDR protocol is in place there will be online resources which make the underlying data more accessible to that group.
Q12. Do you agree with the way that we have specified how gaps in the data should be displayed? For example, where there is a non-communicating period, resulting in a gap in half-hourly data.	The rules and definitions for data gaps seem very comprehensive, although perhaps slightly overengineered. Where Contact experiences any gaps in consumption as a result of MEP/technical failure we simply won't have the data for the entire 24 hours, so the data/record will be blank. We don't accept estimates or partial data from our providers.
Q13. While noting that the primary use case is to support residential and small business information exchange, do you propose any additional changes to accommodate the needs of commercial and industrial users?	Not at this stage due to the many additional complexities that arrive with C&I. Perhaps consider at a later date.
Q14. Do you have any other comments on the Authority's proposals for EIEP14B, EIEP13A and EIEP13B?	The 30 October timeframe is very challenging, as many of our key staff are already stretched to deliver the new billing obligations. As noted in Q5, we are unable to deliver the EIEP13A and B in JSON format by the deadline as it requires a significant change to our systems (and we had expected this would be delivered when the full suite of services goes live in mid-2027).