

24 June 2026

Submissions
Electricity Authority
Level 7, AON Centre
1 Willis Street
Wellington 6011

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

ERGANZ SUBMISSION ON IMPROVING PRODUCT AND CONSUMPTION INFORMATION EXCHANGE: PROPOSALS FOR NEW AND UPDATED STANDARDS

The Electricity Retailers' and Generators' Association of New Zealand ('ERGANZ') welcomes the opportunity to provide feedback on the Electricity Authority's consultation paper, 'Improving product and consumption information exchange: proposals for new and updated standards' (June 2026), covering the new EIEP14B and the updates to EIEP13A and EIEP13B.

ERGANZ is the industry association representing companies that sell electricity to Kiwi households and businesses. Collectively, our members supply almost 90 per cent of New Zealand's electricity. We work for a competitive, fair, and sustainable electricity market that benefits consumers.

Executive summary

ERGANZ supports the Authority's continued work to standardise and modernise the exchange of electricity product and consumption information. Consistent, machine-readable formats, including the move to JSON in EIEP13A and 13B, will support more accurate comparison and switching and a more competitive retail market. This is consistent with the position we took in November 2025.

Our overarching submission is that the Authority must engage more substantively with the Ministry of Business, Innovation and Employment ('MBIE') to align this programme with the Consumer Data Right under the Customer and Product Data Act 2025, and must be able to demonstrate that alignment.

ERGANZ made this request in November 2025 and welcomed the Authority's stated intention to align, but we see little concrete evidence of it in the work of both organisations. This consultation paper focuses on file-based exchanges, requested and returned through the prescribed EIE system, on a separate track from the accredited-requestor, API-based model that the Customer and Product Data Act designation will require. Without demonstrated alignment, retailers face building file-based exchanges from 30 October 2026 and then rebuilding for 'open electricity' shortly afterwards. This is inefficient, raises cumulative compliance costs, and is not in consumers' interests.

Subject to that overarching point, ERGANZ supports the detailed proposals, provided that implementation is proportionate and well sequenced; that the drafting and worked-example

inconsistencies we identify are corrected; that the Authority publishes normative machine-readable schemas; and that the register content code and meter channel matching issue is resolved with a single clear convention.

ERGANZ also recommends that EIEP14B does not commence ahead of a settled authorisation and verification framework, which is currently expected to sit in the not-yet-consulted EIEP14C.

Submission points

ERGANZ strongly requests that this work programme align with MBIE's Consumer Data Right ('CDR') work programme. While the consultation paper frames this work as supporting Open Electricity and the electricity sector designation under the Act, the work here and the standards enacted must be reusable under the CDR rather than superseded by it.

Currently, the EIEP13 and EIEP14 protocols are file-based and use a request mechanism (the EIE system, and in due course EIEP14C) that is not the accredited-requestor API model the designation will introduce. We recommend the Authority work together with MBIE on the design of these data models, to publish a clear alignment plan, and to publish a mapping of the EIEP data models to the emerging CDR data standards. This would give retailers confidence that the investment required from 30 October 2026 is durable. We raised this issue in November 2025 and are now repeating it with greater urgency, because the standards being consulted on are the point at which alignment either is, or is not, built in.

Support for standardisation and the JSON modernisation.

ERGANZ supports replacing the voluntary EIEP14 with a regulated, modular suite, and we support introducing JSON alongside CSV in EIEP13A and 13B, with full ISO 8601 date-times, mandatory time-zone offsets and improved precision. These are sensible, machine-to-machine improvements that reduce duplication and improve reliability for retailers and third parties alike.

Consistency, schemas and worked examples.

EIEP14B is well aligned with EIEP14A in structure, which helps retailers reuse their 14A build. To realise that benefit, the Authority should correct the drafting and worked-example artefacts we identify at Q1 and Q5, run a single consistency pass across EIEP14A, 14B, 13A and 13B, and publish normative machine-readable schemas as the authoritative artefacts against which implementers validate. Clear worked examples, including for data gaps and for the register content code and channel matching case, will materially reduce implementation risk.

Privacy, authorisation and sequencing.

EIEP14B conveys personally identifiable information, yet the consent and verification mechanism is expected to sit in EIEP14C, which has not been consulted on. Consistent with the Privacy Act 2020, retailers should not be required to release a consumer's plan information until a robust authorisation and verification framework is in place. We therefore ask that the 14B obligation not commence ahead of that framework, even if other elements take effect from 30 October 2026.

Proportionality and the matching problem.

We support reserving product information for the EIEP14 formats and minimising it in EIEP13. The corollary is that reliable plan identification depends on matching consumption records to the applicable tariff row. The register content code, period of availability and meter channel question (Q9) is the single most important technical detail in this consultation, and we ask the Authority to settle it with one normative convention that is consistent across EIEP13A, EIEP14B and the registry.

Consultation questions

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, broadly. EIEP14B has been sensibly modelled on EIEP14A, and the shared structure (header, Retailer, Attribute, Schedule, Tariff Type, Tariff Region, Network, Customer Group, Plan, Tariff) should let retailers reuse much of their EIEP14A build, which we support. To achieve full consistency and remove implementation ambiguity, we recommend the Authority correct several drafting and example artefacts before the standard is finalised. These include: the Specifications note referring to “six” record types while listing eight and naming “TARIFFGROUP” rather than “TARIFFTYPE”; mismatched identifiers between the example Tariff Type, Schedule and Tariff Region records and the Tariff rows that reference them (for example SC_H07_21 against SC_H_07_21, TT_RLU_CTRL against TT_RSU_CTRL, and TR_CKHK_ALL against TR_CKHK); the date-time offset shown as a two-digit “+12” in EIEP14B against the mandatory four-digit “+1200” / “+1300” offset now required in EIEP13A and 13B; and the UUID reference citing both RFC 9582 and RFC 9562. These are readily fixed. We recommend a full consistency pass across EIEP14A, 14B, 13A and 13B, and that the Authority publish normative machine-readable schemas (see Q5).
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?	Generally, yes. The single-instance constraints on Customer Group, Plan, Network and Tariff Region, the use of Attribute records for fees, discounts and eligibility, the requirement to specify both current and future tariffs where a change is scheduled, and the BESPOKE PLAN and REPRESENTATIVE_TARIFFS code 4 mechanisms together allow a specific and accurate representation of a consumer’s plan.

Questions	Comments
	Two matters need to be made unambiguous. First, redefining the plan Start date as the consumer's enrolment date (rather than the date the plan became generally available, as in EIEP14A) is a material semantic divergence and should be stated prominently in the field specification so it is not missed when 14A and 14B data are used together. Second, EIEP14B necessarily conveys personally identifiable information, but the consent and requestor-verification mechanism sits in the not-yet-consulted EIEP14C. Retailers cannot safely meet a 14B obligation, consistent with the Privacy Act 2020, until the authorisation and verification framework is settled. We ask the Authority to confirm that 14B will not commence ahead of a settled verification mechanism.
Q3. What additional changes to attributes, structure or content, if any, do you recommend to the proposed EIEP14B to achieve the above objective?	We recommend that the Authority: (a) establish a clear, low-friction governance process for proposing, approving and publishing new attribute codes, given the optional attributes list is expressly "to be confirmed and extended over time" and retailers need certainty about how it evolves; (b) map field and attribute naming to, and where practicable align it with, the data standards being developed for the CDR designation, so the model built for EIEP14B is reusable under Open Electricity rather than rebuilt (see our overarching submission point); and (c) confirm how the header Customer number relates to the authorisation and verification process, to avoid retailers holding inconsistent expectations about which identifiers a valid request must supply.
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. ERGANZ agrees that contact details, meter configuration and billing information should be excluded from EIEP14B. Confining 14B to product and plan information keeps the protocol proportionate, minimises the exposure of personal information consistent with privacy by design, and avoids duplicating data available elsewhere (meter configuration from the registry, and consumption from EIEP13A and 13B). This reflects the position reached at the co-design workshops.
Q5. Do you agree with the proposed key names within JSON objects in the EIEP13A and EIEP13B updates?	We support the move to a JSON option and the three-level hierarchy (ICPResponses, MeterData, ReadPeriods), which sensibly reduces repetition. The key names are workable, subject to correcting inconsistencies between the field specifications and the worked examples.

Questions	Comments
	In particular: the field specification gives the key as “PeriodOfAvailability” (missing an “i”) while the examples use the correctly spelled “PeriodOfAvailability”; and the EIEP13B header File type is specified as “ICPCONS” but the worked example uses “ICPSUMM”. To remove this class of ambiguity, we strongly recommend the Authority publish a normative machine-readable schema (for example JSON Schema) as the authoritative artefact against which implementers validate, with the human-readable tables as explanatory. A normative schema would also provide a concrete, reusable mapping point to the CDR data standards.
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?	Yes. ERGANZ supports separating consumption information (EIEP13A and 13B) from product information (EIEP14A and 14B), and making tariff name optional while retaining it for retailers who already provide it. This is a clean separation of concerns that reduces duplication and maintenance. The consequence is that reliable plan identification depends on matching an EIEP13 consumption record to the applicable EIEP14 tariff row, which raises the register content code and channel matching issues we address at Q9.
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)?	The clarification helps, particularly distinguishing the Consumer Authorisation Code from the Unique Request Identifier, which had previously been a source of confusion. We would support a clearer name to reinforce the distinction, for example “Consent Reference” or “Authorisation Reference”, which more accurately describes the field’s role in linking a response to the consumer’s consent rather than to the transport-level request. Whatever name is chosen, it should be defined identically across EIEP13A, 13B and 14B. We also encourage the Authority to ensure the field’s semantics anticipate the consent model under the CDR, where authorisation will be managed through accredited requestors and a consumer-facing consent record.
Q8. Do the proposed updates adequately future-proof EIEP13A and EIEP13B so they provide sufficient information for foreseeable use cases?	Within the current file-based exchange architecture, the updates are a reasonable modernisation: JSON, full ISO 8601 date-times with mandatory offsets, four decimal place precision, and a report-run date-time that anticipates more timely, on-demand use.

Questions	Comments
	However, genuine future-proofing for the foreseeable use cases, in particular real-time exchange under Open Electricity, requires more than modernising a batch file format. The request and response model in these protocols (file-based, via the prescribed EIE system) is not the accredited-requestor API model the CDR will require. We therefore ask the Authority to state explicitly that these are interim modernisations, and to commit, jointly with MBIE, to migrating consumption-data exchange to the CDR API model rather than entrenching a parallel and separately maintained file-based regime. This is the substance of our overarching submission point.
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?	This is the area requiring the most care. Adding an explicit meter channel number to EIEP13A is a welcome improvement to traceability. However, as the consultation acknowledges at paragraphs 4.7 to 4.9, there is a genuine divergence between the tariff-quoted register content code and period of availability pair (for example "UN-24"), the strictly correct register content code for the half-hourly channel (for example "7304-24"), and the channel number recorded in the registry (channel 1 against channel 51 in the Authority's example). Left unresolved, this prevents reliable matching of a consumption record to the applicable EIEP14B tariff row and to the registry. ERGANZ's view is that EIEP13A records should carry the registry's actual channel and register content code, with the tariff-quoted RCC-PoA pair resolved through the EIEP14A and 14B mapping, rather than overloading the consumption record with the tariff-quoted pair. We recognise that some retailers' legacy systems hold the tariff-quoted pair, so a clear transition and a defined mapping rule will be needed. We ask the Authority to specify a single normative convention and to include a worked example covering exactly the "UN-24" against "7304-24" and channel 1 against channel 51 case, so the result is consistent across EIEP13A, EIEP14B and the registry.
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	Broadly, yes, subject to the caveats in this submission on proportionality, sequencing and alignment. We particularly draw attention to criterion 5.3(g), strategic and international alignment, which expressly includes consistency with an electricity consumer data right. In our

Questions	Comments
for the new EIEP14B and modernised EIEP13A and EIEP13B will collectively support informed consumer choice by enabling more accurate and consistent plan comparison and a more efficient and competitive market?	view the proposals only fully satisfy that criterion if they are aligned with MBIE's work under the CDR. Absent demonstrated alignment, the proposals risk delivering a standard that must be substantially reworked, which would not be efficient against criterion 5.3(c).
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?	The standards are an essential enabler, but they are not themselves consumer facing. A non-technical budget advisor will not work directly with JSON or CSV; the consumer benefit is realised through the third-party tools and services that ingest these formats and present plan and consumption information simply. The proposals support that ecosystem, but their value depends on a healthy third-party layer, which is precisely what an aligned consumer data right is designed to enable through accredited requestors. This reinforces our overarching point on CDR alignment.
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.	We agree this needs to be specified, but we do not consider the drafts yet make it unambiguous. It is not clear whether a gap (for example a non-communicating period in half-hourly data) is to be represented by omitting the interval entirely, by including the interval with a null energy value, or by an estimated value flagged with read status "ES". Each is reasonable, but they are not interchangeable, and inconsistent practice will cause reconciliation and presentation errors. We recommend the Authority specify a single convention, apply it identically in the JSON and CSV forms, and illustrate it with a worked example. Our preference is that genuine gaps be represented explicitly (for example a defined gap or "missing" read status) rather than by silent omission, so a recipient can distinguish a true gap from a truncated transmission.
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?	We agree the primary use case is residential and small business. For commercial and industrial use, the consumption formats would need to accommodate demand (kVA) and power factor data, not only active energy (kWh) and reactive energy (kVARh), because many C&I tariffs include demand components; they would also need to handle multiple registers and channels, embedded networks and loss categories robustly. We do not suggest building full C&I support now, as that would

Questions	Comments
	risk over-engineering the residential and small-business use case and delaying delivery.
Q14. Do you have any other comments on the Authority's proposals for EIEP14B, EIEP13A and EIEP13B?	Our principal comment is the overarching request set out at the top of this submission: that the Authority engage substantively with MBIE to align this programme with the CDR, and demonstrate that alignment. We raised this in our November 2025 submission and welcomed the Authority's stated intention to align with MBIE, but we have seen little concrete evidence of alignment in the standards now proposed, which remain file-based exchanges on a separate track from the API-based CDR model. We ask the Authority to publish, with MBIE, a clear alignment plan and a mapping of these EIEP data models to the CDR data standards, so the considerable investment retailers will make from 30 October 2026 is reusable rather than stranded. The cumulative regulatory load on retailers is substantial across billing reforms, the move to compulsory time-varying pricing, and preparation for the CDR designation are all in train concurrently, so sequencing and realistic transition timeframes matter. Finally, the 30 October 2026 effective date for EIEP14B is ambitious while EIEP14C, which provides the authorisation and verification mechanism, has not yet been consulted on. 14B should not commence ahead of a settled verification framework.

Conclusion

ERGANZ thanks the Authority for the opportunity to submit and for the co-design approach taken to date. Our central request is that the Authority engage substantively with MBIE so that this work is genuinely aligned with the consumer data right, and that this alignment is demonstrated to industry.

If it would be helpful to discuss any of the points in this submission, please contact me.

Yours sincerely,

Kenny Clark
Policy Consultant, on behalf of ERGANZ