

26 March 2026

Submissions
Electricity Authority
Level 7, AON Centre
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Wellington 6011

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

ERGANZ SUBMISSION ON EIEP14A RETAILER PRODUCT INFORMATION

The Electricity Retailers' and Generators' Association of New Zealand ('ERGANZ') welcomes the opportunity to provide feedback on the Electricity Authority's consultation paper, 'Electricity Information Exchange Protocol 14A' from February 2026.

ERGANZ is the industry association representing companies that generate and 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.

Most of our members support Option 1 as the preferred approach. The introduction of Tariff Types and Tariff Regions reduces unnecessary repetition and removes redundant fields, making the protocol more efficient to implement and easier to maintain. The practical consideration reinforcing this preference is that the data model underlying Option 1 bears structural similarities to models our members have already built to meet the Authority's retail data requests. There is also expected alignment with data infrastructure being developed in anticipation of Open Electricity and Consumer Data Right requirements. This creates an opportunity to reuse existing work rather than build from scratch, which meaningfully reduces implementation burden.

On the proposed attribute changes, we broadly agree with the additions set out in Table 2. They address genuine gaps in the existing protocol and will better reflect how modern retail plans are structured. We note that as the Open Electricity programme develops, further attribute requirements are likely to emerge, and we encourage the Authority to maintain an open process for considering additions over time.

We agree with the Authority's assessment regarding plans with undisclosed values. It is not practical to standardise the representation of value that is conditional on consumer behaviour or embedded in tariff rates, and the combination of EIEP14A, EIEP14B, and third-party provider dialogue provides a workable overall approach.

On costs, implementation costs are real but not disproportionate. Many of our members are already investing in data infrastructure to meet related obligations, and the alignment between EIEP14A and emerging CDR data models means that effort invested here is likely to produce durable value across multiple workstreams. However, we note the overall burden of compliance across the sector's entire regulatory reform programme does create significant costs for participants and ultimately consumers.

ERGANZ would like to thank the Authority for considering our submission.

If there are any outstanding questions or a need for further comments, please let me know.

Yours sincerely,

Kenny Clark
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