

24 March 2026

Electricity Authority
Wellington

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

Submission to the Electricity Authority on Electricity Information Exchange Protocol 14A (EIEP14A) - Retailer Product Information

Introduction

Lodestone Energy is New Zealand's leading new-entrant renewable generator and retailer, intending to sell competitive electricity from solar and battery storage into all market segments.

In our role as a retailer, Lodestone supports the development of a competitive, transparent, and innovative electricity market. Lodestone also supports the Authority's broader objective of improving consumer outcomes by enabling more informed choice and strengthening competition.

General support for proposal's intent

Lodestone is committed to continuous innovation in service of its end customers and ensuring the cost benefits of renewable generation can begin to bring consumer prices down. We see solar, both rooftop and utility-scale farms, as a key part of the new consumer product offerings in the market.

Lodestone supports the intent behind the proposal to influence:

- How easily consumers can compare offerings and make choices
- The ability of new entrants to provide differentiated products
- Third-party tools and platforms to support switching and engagement
- Increased transparency
- The degree to which innovation is enabled or constrained.

We are keenly focussed on finding new ways to present products from rooftop and utility-scale solar farms. In doing so, we believe that consumer understanding and comparability can be achieved without limiting innovation of solar and consumer product structures.

Risk of constraining innovation

Lodestone also cautions the EA that standardisation may conflict with the advent of innovative market products including solar-based offers; and future offers are coming into the market.

Lodestone's biggest concern is that standardisation may not properly consider these new offers, and it may create the unintended consequence of constraining retailers' ability to build the most effective offer.

While Lodestone supports the EA's objectives to stimulate competition and improve consumer outcomes, prioritising comparability is potentially in conflict with purposeful innovative product differentiation.

If the framework becomes too prescriptive in how products are defined and disclosed, Lodestone is concerned that it will:

- Ignore the nuances of solar and battery storage;
- May favour traditional, standardised retail products;
- May limit the development of innovative offerings, particularly those that do not fit neatly into predefined categories;
- Could unintentionally entrench incumbent business models, and
- Interfere with true disruption.

Lodestone believes these concerns should be directly addressed in any proposal to regulate retail information.

Implementation

Lodestone encourages the Authority to consider the following question: *what will happen if (when) a retailer develops a product, such as solar-based offer from a solar farm, that does not align with the format?*

Specifically:

- Can new products be given a specific blanket exemption until the format is flexed to deal with the different shaped products?
- If not, can the retailer apply for an exemption?, or
- Would there be provision to submit product information outside of the EIEP14A standard?
- How quickly and efficiently could such exceptions be handled in practice?

If all products must conform strictly to the EIEP14A structure, there is a risk that outcomes would result in products that fit the framework but deny the consumer a viable alternative.

Lodestone Recommendations:

Our recommendations are:

- 1) Set a goal to ensure there is a balance between consistency and comparability, and flexibility and adaptability.
- 2) Ensure the Authority incorporates optional or extendable fields within the data standard and allow for non-standard attributes to be included alongside required fields.
- 3) Provide a prioritised pathway that supports innovative consumer offers.
- 4) Intentionally avoid an exemption process, as it will discourage innovation and is likely to be unduly time consuming and expensive.

Lodestone believes EIEP14A must be introduced as an evolving standard, with regular updates to reflect product, consumer, market innovation. New entrant market participants – the organisations currently driving innovation – must be consulted and actively involved in protocol design.

Conclusion

Lodestone supports the Authority's objective of improving consumer choice and strengthening competition through better access to retail product information. However, careful design is critical to ensure that:

- Standardisation does not come at the expense of innovation
- New and differentiated products can be brought to market efficiently
- The framework supports, rather than constrains, new entrants and evolving business models.

Lodestone encourages the Authority to explicitly address how non-standard or innovative products will be accommodated within the framework, and to ensure that flexibility is embedded from the outset.

Lodestone would welcome ongoing engagement with the EA as the protocol is refined.

Kind regards

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