

26 March 2026

Electricity Authority
By email: consumer.mobility@ea.govt.nz

Proposals for Electricity Information Exchange Protocol 14A – Retailer product information

Meridian appreciates the opportunity to provide feedback on the above consultation paper.

Our feedback is limited to a few specific points, as set out below:

- We agree with the Authority that Option 1 is preferred as it achieves less repetition, which we expect would lead to a more efficient information exchange process.
- We note that significant time and effort will be required to convert our pricing plan information into the specified format (once this is agreed). We acknowledge that decisions have already been made to make EIEP14A mandatory. However, the time and effort required to meet this requirement should be considered by the Authority as it determines decisions and timeframes in other workstreams which might impose further retail compliance costs. In particular, retailers are facing a number of obligations which need to be delivered by the end of October.
- We note that Meridian (and we assume other retailers) will make every effort to ensure that information conveyed via EIEP14A is accurate. However, it may not be possible to guarantee that 100% of this data is accurate 100% of the time and we expect regular updates to be made. The Authority should emphasise to any third parties that will be relying on this data that they should seek regular updates to ensure the latest and most accurate information is used.
- We note the following specific questions and comments on implementation of the EIEP14A requirements. We are happy to engage with the Authority directly to discuss these, if that would be helpful:
 1. If a short-term (e.g. 3 month) promotion is run for customers on a certain plan, is it necessary to create an entirely new plan to represent this? As it stands, as there is no end date on attributes, it appears a new plan would need to be created for each new promotion regardless of whether the underlying pricing changes.

2. We suggest the 'daylight savings' attribute should by default be set to '1' i.e. it should be assumed that times are represented in daylight savings time. This could then be updated by exception.
3. We understand the 'end date' for a plan relates to when the pricing for the plan expires and the 'close date' relates to when it is removed from the market (being earlier than the end date). Is this correct?
4. To prevent unnecessary duplication, inconsistency or ambiguity, it would be helpful if the Authority could clarify the expected use of attributes. For example, where an attribute can be used for both a plan and a tariff, is there an expectation that the attribute is repeated consistently across both the plan and tariff records or defined once only (at either plan or tariff level)?
5. We are assuming that embedded networks are excluded from EIEP14A plan reporting requirements. Can the Authority confirm?
6. If an error is identified in an EIEP14A file, we assume this should be corrected only where the pricing is still live in market and material. Is this correct or is there no time-bound or materiality associated with the requirement to advise each and every recipient of this information?
7. Note, Table 1 in EIEP14A has 78 / N missing.
8. The format specified for the 'data extract date and time' field (page 9 of Option 1) does not provide for a date.

Please contact me if you have any queries regarding this submission. This submission can be published in full.

Nāku noa, nā

Matt Hall
Principal Advisor – Regulatory Affairs and Government Relations