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## 2degrees supports Improved Access to Electricity Product Data

### Introduction:

2degrees welcomes the Authority's initiative to improve consumer access to electricity product data, as this can empower customers to make informed choices and enhance retail competition. We have long advocated for measures that put consumers at the center of the energy market and agree that *"everyone should have access to affordable electricity"*<sup>1</sup>.

Consistent with our *Fighting for Fair* ethos, we support practical steps (like standardised data sharing and unique product identifiers) that help consumers compare plans and switch providers easily.

However, any new regulations in this space must be targeted, proportionate, and mindful of competitive sensitivities.

In our view, the Authority's proposed Code changes are well-intentioned, but a few adjustments are needed to protect confidential information and ensure a smooth implementation.

### Access to active Tariff Plans and confidentiality of Legacy Tariff Plans

The Authority proposes expanding Code clause 11.32G so that product data requests cover all active plans, including legacy plans that are no longer generally available to new customers. In essence, any person (for example, a third-party service or another retailer) could request details of a plan that a retailer currently only offers to existing customers under older contracts.

In 2degrees' view we do not support making confidential legacy tariffs publicly accessible in this manner. Tariff plans that are not publicly available (e.g. grandfathered plans from past promotions) are part of a retailer's competitive strategy and are offered only to certain customers; the details of these plans are commercially sensitive. Requiring us to share legacy plan pricing, terms, and codes with *any* requester (including competitors) would unfairly expose proprietary information. It could also lead to confusion or misinterpretation, since these legacy offers are not open for sign-ups.

Crucially, 2degrees agrees that individual customers should have easy access to information about their own plan, even if it's a legacy one. The Code already allows a customer (or their authorized agent) to request their usage and tariff details, and we support adding product codes to that process for transparency. Thus, if one of our existing customers on a legacy plan wants to compare their current plan (via a code) to others on the market, we will provide that data to them or a comparison tool acting on their behalf. This empowers the consumer to make informed switching decisions – which is the core goal.

We do not see the public benefit in providing access to legacy plans as new customer cannot sign up to those plans anyway.

2degrees recommends that the Authority amend the proposal so that retailers are only obligated to provide legacy plan data when responding to the customer who holds that plan (or their agent). The Code wording could be adjusted to clarify that “*generally available*” plans must be provided to any requester, but “*no longer available*” plans can be provided upon request by the customer to whom that plan applies.

We believe this strikes the right balance between transparency and competition. We also note it aligns with the spirit of New Zealand’s upcoming Consumer Data Right framework – where data is shared with consumer consent, not openly published to unrelated parties.

### Support for Product Codes (Including for Legacy Plans)

2degrees supports the use of unique product codes for all plans, including legacy ones. In our view, standardizing plan identifiers is a positive, pro-consumer step. It will make it much easier for customers (and comparison websites or brokers) to identify which plan a customer is on and pull up the correct details for an apples-to-apples comparison. In our experience, one hurdle to seamless switching is confusion around plan names or versions – a code solves that by acting as a consistent key for each plan.

2degrees intends to collaborate with the Authority on defining the format and registry process for codes to ensure uniqueness across the industry. We also suggest the Authority provide guidance on how these codes will be communicated to consumers (e.g. via bills or account portals) to maximize awareness.

### Extend the Implementation Period (6–12 Months Needed)

In our view, the consultation paper implies an aggressive timeline for implementing these code amendments, aiming to support a new comparison service in 2026. While a specific Code commencement date isn’t set, the expectation is that once standards are finalized (potentially in Q1 2026), retailers should start providing the expanded product data (with codes and legacy coverage) as soon as possible.

We urge the Authority to allow a reasonable transition period of approximately 6–12 months for these changes. This means if the Code amendments are approved in early 2026, compliance might be required by late 2026 (for a 6-month lead time) or early 2027 (for a 12-month lead). Our rationale is grounded in practical implementation feasibility and the cumulative impact of regulatory change:

- **Systems and process changes:** Complying with the new requirements involves multiple tasks – generating and backfilling product codes for all plans, updating billing and CRM systems to store and display these codes, developing new processes to handle 11.32G requests for legacy data, and integrating with whatever new EIEP14 data exchange format is prescribed. These are likely to be significant IT and operational changes that cannot be rushed without risk. Based on our experience, even a seemingly small change (like adding a prompt on a bill) requires project time; for something of this scope, **at least 6 months of development and testing is needed**, and 12 months is more comfortable.
- **Concurrent initiatives:** It’s important to consider that retailers are currently managing numerous other regulatory implementations. For instance, as of late 2025, we are dealing with new billing content rules, consumer care obligations, half-hourly reconciliation projects, and more. Imposing a very short deadline for the product data

changes would strain our resources and could force us to divert attention from other consumer-facing improvements. In our billing submission, we highlighted that piling on many changes simultaneously can have the *“unintended consequence of driving up costs... and creating barriers to entry”* for independent retailers. A hurried implementation of the product data amendments might inadvertently disadvantage smaller players or result in errors that affect consumers (e.g. incorrect data being shared initially).

- **Phased rollout:** We recommend a phased approach within that 6–12 month window. Perhaps codes can be assigned and internal systems updated first or triaged by active vs legacy plans, then the external data exchange testing can occur, and finally the go-live of responding to public requests under the new regime. A phased plan would let all parties (retailers, the Authority, the new comparison tool provider) iron out any technical kinks before consumers start using the system widely. It also aligns with the Authority’s stated intent to finalize data standards (like EIEP14) with industry input – giving time to do that right, rather than rushing to meet an immediate enforcement date.

### Concluding remarks

2degrees is committed to improving consumer access to information and making it easier for Kiwis to find the best electricity deals.

We support the core intent of the Authority’s proposal – to standardize and open up product data for consumer benefit – and with the modifications we’ve outlined, we believe the initiative will succeed in promoting competition while respecting commercial realities and confidential information.

We appreciate the opportunity to provide feedback on this consultation. 2degrees remains a strong proponent of consumer-centric competition and looks forward to working constructively on the rollout of these improvements.