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18 November 2025

Electricity Authority
Level 7, ASB Bank Tower
2 Hunter Street
Wellington 6011

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

Tēnā koutou,

Electric Kiwi Submission: Proposed Code amendments to improve access to electricity product data

Electric Kiwi welcomes the opportunity to comment on the Electricity Authority's Consultation on proposed Code amendments to improve access to electricity product data. We support the Authority's objectives to give consumers and third-party service providers reliable and up-to-date information about available electricity products, to introduce a clear and standardised way for retailers to share this information, and to make it easier for all parties to identify, access, and compare individual pricing plans.

Alignment with MBIE and the Consumer Data Right Framework

Electric Kiwi strongly encourages the Electricity Authority to continue to work closely with MBIE to ensure the proposed EIEP14A protocol is fully aligned with any future Consumer Data Right (CDR) framework for New Zealand. While we see merit in progressing the development and consultation on data standards ahead of electricity's formal CDR designation, we urge the Authority not to require retailers to implement or operationalise EIEP14A until (or unless) electricity is officially designated under CDR.

This approach would:

- Avoid the risk of wasted or duplicated investment if future CDR rules require changes; and



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- Ensure any investment retailers make to comply with EIEP14A will also deliver compliance with CDR standards, once finalised.

Broad Plan Coverage

We are concerned that some retailers routinely offer “save” or retention deals to selected existing customers, or targeted acquisition offers through specific channels or to particular customer segments. These offers are not always published in all public channels (and sometimes not published at all) meaning other eligible existing or new customers cannot access them. The commercial rationale for this practice is clear: such targeted deals help manage churn and margins while avoiding a broader repricing of the incumbent base or attracting additional demand to sharper rates.

By limiting the disclosure protocol to “generally available” plans and legacy plans (which although active are not generally available), there is a real risk that the proposed Code change will entrench and even encourage this behaviour. Retailers would continue to have an incentive to shift their most competitive pricing off-catalogue into targeted or secret offers, further undermining the transparency, comparability, and consumer empowerment that this reform is intended to deliver.

To address this risk, the EIEP14A protocol should require disclosure of all plans with active customers, except for genuinely bespoke staff discount plans. This approach would close potential loopholes, ensure fairer access to the best available offers, and more fully support the Authority’s objectives for a transparent, competitive, and consumer-focused electricity market.

Conclusion

We look forward to continuing to engage on this work and welcome the opportunity to help ensure a fair, transparent, and competitive market for all New Zealand electricity consumers.

Yours sincerely,



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