

18 November 2025

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Improving Access to Product Data Consultation

Genesis welcomes the opportunity to provide feedback on the Electricity Authority's (**Authority**) "Proposed Code amendments to improve access to electricity product data" consultation paper dated 8 October 2025.

Executive Summary

Genesis supports standardised product data that helps consumers compare plans. We back a phased, co-designed approach with tight scope, pragmatic performance standards, and alignment with MBIE's Consumer Data Right (**CDR**) workstream, so benefits can be delivered without unnecessary duplication or cost.

The Authority's revised proposal moves materially toward positions we advocated in earlier consultations—mandatory and modular EIEP14, staged implementation, unique plan identifiers, and the exclusion of historic/closed plans.

We support the package provided the Authority embeds clear guardrails: (i) scope discipline — coverage limited to active mass-market plans with mandatory generally available / not-actively-promoted flags and explicit exclusion of bespoke or negotiated enterprise agreements and historic/closed plans; (ii) realistic phasing — maintain phase lengths of roughly 18–24 months; (iii) pragmatic performance standards — retain current timeframes now; (iv) charging - retain the ability to recover reasonable costs for bespoke or out-of-protocol requests; and (v) the continued close alignment with MBIE CDR workstream.

We consider that these changes better balance consumer benefit and compliance cost, reduce execution risk, and ensure interoperability with CDR standards as they mature.

Introduction

We support the Authority's objectives to improve comparability, transparency and consumer participation. As in our previous submission, we acknowledge and support the shift toward a modular, machine-readable product-data standard and agree that unique product identifiers will help consumers and third parties accurately identify plans.

We also recognise the Authority's movement toward a more pragmatic, industry-aligned implementation pathway: combining EIEP14A and 14B into a single protocol, excluding historic plans, phasing delivery, and signalling a co-design process. These refinements address many of the concerns we and others raised in earlier consultations.

At the same time, the proposal still carries material implementation, scope and sequencing risks—particularly around the breadth of “active but not-promoted” plans, the potential for scope creep into bespoke or negotiated enterprise arrangements, performance signals that may imply instantaneous exchange before MBIE's CDR settings are settled, and the removal of cost-recovery for non-standard requests. Genesis considers these issues manageable if the Authority embeds clear scope definitions, phase-appropriate performance standards, evidence-gates, and formal EA–MBIE alignment into the design and implementation process.

Conditional Support

Genesis supports the intent of the proposed amendments, subject to the following refinements:

- **Scope discipline:** Limit coverage to active mass-market plans, with mandatory GA / not-actively-promoted flags. Explicitly exclude historic plans and bespoke, one-off, or negotiated enterprise agreements.
- **Unique product identifiers:** Require persistent product IDs with versioning and lifecycle states (active / superseded / withdrawn). Align with MBIE's CDR work to avoid duplicate schemas.
- **Phased delivery and evidence-gates:** The indicative Jan–Mar 2026 timeframe for implementation is unrealistic. Allow time for co-design and retailer IT infrastructure and project requirements. Maintain phase lengths of ~18–24 months, with go/no-go gates to include assessment criteria and updated cost–benefit analysis.
- **Performance expectations:** Retain current timeframes and develop realistic, stage-appropriate performance standards through co-design once

EIEP14 structures are confirmed. Consider any “near-instant” expectations only in a future, MBIE-aligned CDR phase.

- **Charging for non-standard requests:** Retain ability to recover reasonable costs for requests that: (a) fall outside the EIEP14 schema, (b) require bespoke filtering/formatting, (c) require significant manual intervention, or (d) are made at materially excessive frequency or volume. This deters ad-hoc demand that undermines standardisation and avoids unnecessary cost.
- **Governance and alignment:** Keep technical detail in EIEPs/guidance to allow iteration; establish formal EA–MBIE coordination to ensure CDR interoperability and avoid duplicated builds.

These refinements should help deliver a robust and proportionate product-data regime that supports comparability, reduces execution risk, and provides a high-quality foundation for an electricity CDR.

Conclusion

Genesis supports the Authority’s direction and welcomes continued engagement to co-design standards that are practical, future-proof, and aligned with the wider digitalisation and CDR work programme. We look forward to contributing constructively to the EIEP design and consultation on finalised standards.

Yours sincerely



Warwick Williams
Senior Regulatory Counsel | Group Insurance Manager

SCHEDULE

Questions	
Q1. Do you agree with the Authority's proposal to combine the proposed EIEP14A and EIEP14B? If not, why not?	Support provided it expressly excludes historical plans, bespoke, one-off, or negotiated enterprise agreements.
Q2. Do you agree with the Authority's proposal to introduce a unique plan identification code system for all retail electricity plans? If not, why not?	Support a persistent machine-readable product ID. Align with MBIE's Consumer Data Right to avoid duplicate schemas.
Q3. Do you have any suggestions for how the product identifier code system could be implemented?	Adopt a lightweight, stable ID model. For example: (1) Retailer creates/maintains IDs; (2) Authority publishes a simple reference registry/map; (3) Version on material plan changes; (4) Prohibit re-use of retired IDs; (5) Include GA/not-actively-promoted flags; (6) Co-design common validation rules and change-control with MBIE.
Q4. How could product identifier codes be included on electricity bills such that they can be utilised by everyday consumers?	Keep labels plain-language (e.g., "Your plan code") and avoid bill clutter by using a single, consistent placement.
Q5. Do you agree with the Authority's proposed staged approach to designing and implementing EIEP14s? If not, why not?	Support – however, we consider the January-March 2026 unrealistic for implementation. In addition to coinciding with IT "brown out" periods, implementation requires, amongst other things, co-ordinating and sequencing with inflight and proposed IT projects underway. We would expect implementation to take at a minimum, 6-12 months from completion of the design and development phase. Accordingly, we reiterate a phase length of ~18–24 months with evidence-gates.
Q6. Do you agree with a Code amendment extending existing requirements on retailers in 11.32G to provide product information upon request?	Support, with tight scope. Limit to (i) GA plans and (ii) "active, not-actively-promoted" mass-market plans. Expressly exclude historical plans, bespoke/one-off enterprise deals. Require GA/not-promoted flags in the dataset to keep compliance clear and auditable.

Q7. Do you agree with the removal of the ability for retailers to charge for data requests where those requests are made in a format the retailer does not normally use in 11.32G? If not, why not?	No. Removing cost-recovery for non-standard requests undermines the central purpose of the reforms: standardisation. If bespoke or out-of-protocol requests are free, requestors have no incentive to use the standard EIEP14 format, increasing the likelihood of ad-hoc, fragmented requests and defeating the efficiency gains the Authority is trying to achieve. It also shifts unlimited and unrecoverable costs onto retailers for manual, one-off or customised extracts, encouraging inefficient behaviour by commercial requestors and creating an inequitable free-rider problem. Non-standard extracts carry real processing, security and quality-assurance costs, and international data regimes (including MBIE's CDR work) allow cost recovery precisely to deter inefficient, bespoke requests. Cost recovery must be retained for any request made: outside the EIEP14 schema or file structure, requiring bespoke filtering, formatting or transformation, requiring manual intervention or custom extraction, or made at a frequency or volume that materially exceeds normal operational expectations. This preserves the Authority's standardisation objectives while protecting retailers – and ultimately consumers – from unnecessary cost and complexity.
Q8. Do you agree with a Code amendment to empower the Authority to prescribe an EIEP for the purposes of 11.32G? If not, why not?	Conditional support. Use the Code for high-level obligations and governance; keep technical detail in EIEP standards and guidance so they can iterate with MBIE's CDR technical profile (security, authentication, versioning). Require co-design and public change-logs.
Q9. Do you agree with a Code amendment requiring retailers to associate their retail electricity plans with product identifier codes? If not, why not?	Support as discussed above.
Q10. If implemented, should the details of how the product identifier code system be established within the Code, or within guidance documents that the Authority would publish?	Put principles and obligations in the Code; put the technical specification in EIEP/guidance. This creates durable legal clarity while allowing pragmatic iteration (e.g., field lists, validation rules) through co-design and versioned guidance.
Q11. Do you agree with the Authority's proposal to not amend timeframes for retailers to respond to requests at this time? If not, why not?	Agree. Further, as discussed in our 12 August 2025 response to the Authority's July consultation paper on product data standards, performance standards for product data and MBIE's CDR should reflect electricity sector realities. For the reasons set out in that response, we do not consider that instantaneous delivery is required.

Q12. Do you agree with our refined proposed assessment criteria?	Support, in particular, the addition of strategic and international alignment.
Q13. Do you agree with the Authority's preliminary assessment that the proposal is better than the status quo? If not, why not?	Yes - subject to the conditions discussed above.
Q14. Do you agree with the objectives of the proposed amendment? If not, why not?	Support.
Q15. Do you agree with the Authority's preliminary assessment that the benefits outweigh the costs? If not, why not?	Support – subject to the conditions discussed above and provided that the CBA is refreshed at each key evidence-gate/phase.
Q16. Do you agree that the proposal promotes the Authority's statutory objectives? If not, why not?	Yes – subject to the comments above and provided scope and sequencing remain disciplined and pragmatic.