



Consumer Mobility Team  
Electricity Authority  
via email  
consumer.mobility@ea.govt.nz

18 November 202518 November 2025

Dear Consumer Mobility Team

**Proposed Code amendments to improve access to electricity product data**

Thank you for the opportunity to submit on the Authority's "Proposed Code amendments to improve access to electricity product data" consultation ("Consultation"). Mercury's submission is attached at the appendix to this cover letter.

Please let me know if you have any questions.

Yours sincerely



Jo Christie  
**Regulatory Strategist**



## APPENDIX – MERCURY SUBMISSION

Question	Comments
<p>Q1. Do you agree with the Authority's proposal to combine the proposed EIEP14A and EIEP14B? If not, why not?</p>	<p>Yes, we agree with the Authority's proposal to scrap the proposed EIEP14B and agree with the decision to exclude historic plans that are no longer contracted to any customer from the new EIEP14A.</p> <p>We do not however agree with the inclusion in the new EIEP14A of legacy plans or "active plans" that are "non-promoted but still contracted to consumers." As we submitted originally, we see no value in providing information on plans that are not available to customers. This requirement risks creating confusion and frustration for customers if they see cheaper prices that they cannot access. Given the number of plans that are included in this category of legacy plan (which we note Mercury is phasing out), this requirement would create operational overheads for no apparent consumer benefit. Customers can already view their own rates on their bill for comparison with Mercury and other retailer's generally available plans.</p> <p>Our strong preference is for legacy plans to be excluded from EIEP14A.</p>
<p>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?</p>	<p>We support the idea of a unique plan identification code, but implementation will be difficult.</p> <p>Industry-wide standardisation means additional work, particularly if these codes need to be visible to agents, shared with customers, and appear on bills. Retailers are also hard at work to meet other code amendments such as delivery and rollout of time-of-use (TOU) and planning for potential work from the 'Improving electricity billing in NZ' consultation.</p> <p>Excluding legacy plans from EIEP14A in (see our response to question 1) and giving retailers a longer timeframe to implement the new codes (see our response to question 5 below) would enable a more efficient implementation process.</p>
<p>Q3. Do you have any suggestions for how the product identifier code system could be implemented?</p>	<p>We recommend the Authority start with standardised retailer codes, regions, metering types then give retailers some flexibility as to how codes should apply in way that makes sense to their products and offers. For example, this could be a retailer code plus a set number of alpha numeric characters.</p>
<p>Q4. How could product identifier codes be included on electricity bills such that they can be utilised by everyday consumers?</p>	<p>The challenge is to be short enough that it's easy for customers to copy and clear enough to understand. This could be very challenging for customers depending on the complexity level of the code. We would be happy to work with the Authority to find a solution that will work for retailers and everyday consumers.</p>



<p>Q5. Do you agree with the Authority's proposed staged approach to designing and implementing EIEP14s? If not, why not?</p>	<p>No we do not agree with the Authority's staged approach to designing and implementing the new EIEP14s.</p> <p>A month between stages is not long enough, especially given overlaps with the TOU delivery. Both will require significant technical resources, so spreading out the timing would be very helpful.</p> <p>We have submitted in our response to the Authority's "Improving electricity billing in New Zealand" consultation, that delaying better plan requirements until April 2027 would give retailers time to embed TOU plans and complete the phase out of the Low Fixed User Charge in a way that is more operationally efficient.</p> <p>We request the same delay be applied to the EIEP14 proposals to allow retailers to plan implementation in a logical and sequential manner. This would ensure the highest priority/most impactful work is addressed first.</p>
<p>Q6. Do you agree with a Code amendment extending existing requirements on retailers in 11.32G to provide product information upon request?</p>	<p>We do not agree with the Code amendment at 11.32G(1)(b) as we do not agree that legacy plans should be considered part of the product information a retailer should be required to provide. Please see our response to question 1.</p> <p>We agree with all other proposed amendments to 11.32G.</p>
<p>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?</p>	<p>No we do not agree with the removal of the ability for retailers to charge for data requests that are not in the standard format. Our strong preference is to retain the ability to charge for such bespoke requests. There will be operational costs for retailers to manually provide information in any varied format and therefore retailers should be able to charge a reasonable fee for this service. It is not efficient and will drive internal cost to create and review quality data checks manually. Any charges would also support the uptake of preferred standard format requests.</p>
<p>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?</p>	
<p>Q9. Do you agree with a Code amendment requiring retailers to associate their retail electricity plans with product identifier codes? If not, why not?</p>	
<p>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?</p>	<p>Mercury's preference would be for the product identifier code to be established within less prescriptive guidance documents rather than the Code. With the sheer volume of plans it will be hard for retailers to adhere to strict naming conventions.</p> <p>If the requirements around product identifier codes are too prescriptive there is also the risk that innovative new plans cannot be appropriately coded, and this will limit and confuse consumers' ability to easily compare with other plans.</p>



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?	Yes, we are supportive of the current timeframes in place.
Q12. Do you agree with our refined proposed assessment criteria?	
Q13. Do you agree with the Authority's preliminary assessment that the proposal is better than the status quo? If not, why not?	
Q14. Do you agree with the objectives of the proposed amendment? If not, why not?	
Q15. Do you agree with the Authority's preliminary assessment that the benefits outweigh the costs? If not, why not?	As the Authority points out there will be significant costs to retailers to implement the new EIEP14s and the product identifier codes. In the absence of a full cost benefit analysis and research into expected uptake and consumer outcomes it is not possible to gauge whether the benefits will justify the cost.
Q16. Do you agree that the proposal promotes the Authority's statutory objectives? If not, why not?	

