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Submissions – Consumer Mobility  
Electricity Authority

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**Nova Energy's submission to the consultation paper: Proposed Code amendments to improve access to electricity product data**

Nova Energy (**Nova**) welcomes the opportunity to submit on the Electricity Authority's (the Authority's) above-mentioned consultation paper.

We support the objective of improving transparency and enabling consumers and third-party providers to access consistent and reliable product information. Better data can support consumer choice, reduce friction in the switching/consumer mobility process, and enable innovation.

However, several aspects of the proposal introduce significant implementation challenges, complexity, and cost, with limited evidence they will materially improve outcomes for consumers. Nova's key concerns relate to scope clarity, the design and purpose of product identifiers, the operational impact of expanded obligations, and the realism of timeframes. We also emphasise some elements appear likely to impose substantial cost while providing only incremental consumer benefit.

We would welcome continued involvement in co-design to help ensure the final Code amendments are workable, proportionate, and aligned with the sector's broader data and technology roadmap.

We note and appreciate the EA's comments that:

- the proposed Code amendments are closely aligned to a potential designation of the electricity sector under the CPD Act;
- the EA is working closely with MBIE to ensure work is aligned so that product data standards both serve today's market and support tomorrow's CDR; and
- by progressing this work now, the EA is preparing the electricity sector for a smooth transition into a potential electricity CDR.

However, we wish to stress that the designation of the electricity sector under the CPD Act is fully expected and supported by Nova. It would therefore be most useful if MBIE and the EA were to release a joint / co-authored document in this regard, particularly to ensure that:

- both agencies are fully aligned and that the parallel workstreams will not lead to duplicated, inconsistent or unnecessary development work by retailers; and
- retailers have clarity on what to expect, when full compliance is required by (noting significant technology investment and resources will be required in this regard, and having a sufficient "runway" notified in advance is crucial), and how (and by whom) new / amended regulation regarding consumer electricity data matters are to be monitored and enforced.

Yours sincerely

**Tamiris Robinson**  
Regulatory Advisor

**Nova Energy**

## Nova submission: Proposed Code amendments to improve access to electricity product data

Questions	Comments
Q1. Do you agree with the Authority's proposal to combine the proposed EIEP14A and EIEP14B? If not, why not?	<p>Nova supports the intent to consolidate the protocols, as a single, well-designed template should be simpler to maintain than multiple parallel versions.</p> <p><u>However</u>, the combined protocol must remain practical. We question how many customers would request or make use of the new mandates, as in Nova's experience the current EIEP14 has not been heavily requested or used by customers up to this point.</p> <p>Furthermore, we believe the final structure should also align with the upcoming CDR technical standards to avoid retailers developing two different versions of the same product dataset. If these conditions are met, combining the templates is a sensible step.</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>Yes, unique identifiers are useful for machine readability, consistency, and interoperability. However:</p> <ul style="list-style-type: none"> <li>• identifiers have limited practical value for consumers</li> <li>• rigid or overly prescriptive formats would impose unnecessary system changes</li> <li>• retailer systems differ significantly, so flexibility is essential</li> <li>• identifiers should not be used to justify displaying codes on bills</li> <li>• alignment with CDR schemes is essential to avoid multiple builds</li> </ul>
Q3. Do you have any suggestions for how the product identifier code system could be implemented?	<p>Nova considers retailers should be responsible for assigning their own identifiers using a simple and persistent alphanumeric format. This approach minimises administrative overhead and allows retailers to map identifiers to existing internal product codes where appropriate. The identifier should remain stable over the life of the product, not change with routine price or term updates, and should not require centralised coordination or registry functions. Above all, and to reiterate, the identifier system must integrate seamlessly with the CDR data model to avoid duplicated development.</p>
Q4. How could product identifier codes be included on electricity bills such that they can be utilised by everyday consumers?	<p>Nova does not support including identifier codes on bills at this time. Most consumers are unlikely to find plan identifiers meaningful and requiring them on bills risks adding unnecessary complexity and detracting from efforts to standardise billing and improve clarity. Any future consideration should be informed by consumer testing led by the Authority and demonstrate that identifiers meaningfully support comprehension and switching. The current proposal does not establish this.</p>

Q5. Do you agree with the Authority's proposed staged approach to designing and implementing EIEP14s? If not, why not?	Yes. However, Nova would require at least 12–18 months from the finalisation of specifications and data schemas to implement all system changes, test across multiple internal platforms, and ensure adequate data governance. We also suggest stages are aligned with the timing of CDR technical standards, as implementing EIEP14 in isolation risks duplicated system builds.
Q6. Do you agree with a Code amendment extending existing requirements on retailers in 11.32G to provide product information upon request?	<p>Nova is supportive of being transparent and open when providing product information upon request. However, Nova has some concerns around the proportionality of the expanded scope proposed by the Authority and the material benefits this may in fact provide consumers – it could instead introduce ambiguity and confusion.</p> <p>Expanding the scope risks significantly increasing the volume and complexity of requests retailers must respond to, particularly if they relate to legacy, bespoke, or non-standard plans.</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?	Not at this stage. Eliminating cost recovery could create incentives for high-volume, or poorly framed requests, placing pressure on smaller retailers who have limited resources. If the ability to charge is removed where the request is deliberately for a specific unused format, strong controls and clear guidance are essential to avoid unreasonable burden.
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?	Yes.
Q9. Do you agree with a Code amendment requiring retailers to associate their retail electricity plans with product identifier codes? If not, why not?	Yes, subject to the design principles outlined earlier: flexibility, retailer-led assignment, non-prescriptive format, and alignment and interoperability with CDR.
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?	Nova strongly prefers that technical details be published in guidance rather than embedded in the Code. Guidance allows for iteration as technical requirements evolve, particularly as CDR standards develop. It also avoids the rigidity and administrative burden associated with Code amendments. The Code should remain principles based.
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?	<p>If the Authority proceeds with the proposed changes, it may be advisable to consider also expanding the response timeframe in respect of providing information regarding the legacy, bespoke, or non-standard plans under proposed clause 11.32G(1)(b).</p> <p>For the avoidance of doubt, Nova is comfortable with the current 5 business day response timeframe continuing to apply to requests for expanded information under proposed clause 11.32G(1)(a).</p>

Q12. Do you agree with our refined proposed assessment criteria?	Yes.
Q13. Do you agree with the Authority's preliminary assessment that the proposal is better than the status quo? If not, why not?	Yes, noting Nova's comments made in this submission (considerable cost with limited demonstrable consumer benefit, risk of over-engineering, and ensuring alignment and interoperability with the future CDR regime).
Q14. Do you agree with the objectives of the proposed amendment? If not, why not?	Yes, Nova supports the underlying objectives— improving transparency, enabling more consumer engagement, and access to data.
Q15. Do you agree with the Authority's preliminary assessment that the benefits outweigh the costs? If not, why not?	Nova does not agree that this has been demonstrated at this stage. While some benefits are clear (i.e., standardised data structure), others are limited or speculative. Some elements proposed (particularly mandatory identifier display and expanded request handling) may impose significant system and operational costs for retailers without materially changing consumer behaviour or comprehension.
Q16. Do you agree that the proposal promotes the Authority's statutory objectives? If not, why not?	Yes, subject to comments above at clause 15.