22 June 2026

Consumer Mobility Team
Electricity Authority
Te Mana Hiko
Wellington, New Zealand

**RE: Consultation – 'Improving product and consumption information exchange – proposals for new and updated standards'**

Dear Consumer Mobility Team,

Thank you for the opportunity to provide feedback on the proposed *'Improving product and consumption information exchange – proposals for new and updated standards'.* As one of the largest third-party requestors of electricity data, we consider these processes fundamental to our business and our ability to deliver value to consumers.

We still have concerns about the data provider's ability to decide on the data format, either CSV or JSON. We believe this adds unnecessary cost to the provisioning of data for consumers and their nominated representatives. It will also inhibit the digitalisation of the electricity sector data exchange process, which is critical to many functions as we electrify.

We believe inertia and the status quo will mean there is no effort to move to a more modern machine-to-machine data exchange mechanism. Data 'receivers' will have to be alert to changes from one format to the two formats. Do we make an effort now to handle JSON, or do we wait until we see a change? How do we get customers to wear that cost now when there is no requirement?

We note that the Authorities' response to this issue, in the *EIEP14A Decision documen*t published on 30 April 2026, is to leave it to the data provider. At a minimum, there should be a clear indication of when JSON formats are compulsory (for example, 12 months' time). The Authority's Consumer Mobility team should seek to understand from all data holders their intentions regarding protocol formats (CSV or JSON).

That said, we think the work on these documents is clear and complete, with minor edge cases we discuss below. We appreciate the effort that has gone into the design of these documents, which have clearly taken into account historical comments from all stakeholders.

We have approached the review of these documents through two lenses;

1. Does all the information exist in the consumption data protocol we request and receive (EIEP13A) and the specific ICP-level tariff protocol (EIEP14B) to enable us to

regularly create the exact customer bill they receive from their retailer?

2. Are the protocols designed unambiguously and robustly, with sufficiently clear instructions to ensure consistent data across all market participants required to create them?

**Can we recreate the exact customer bill?**

There is still an inability to recreate the customer bill because the billing period start and end is not provided. This would be useful information in the EIEP14B. Even if the date period of a consumer bill is known (by looking at a specific customer bill), it cannot be assumed that the billing period starts at midnight on the indicated start day. The EIEP14B would also need to specify the exact time of any free power (e.g. hour of power).

We believe accurately calculating a billing period that exactly matches a customer's bill will be difficult.

**Are the protocols unambiguous?**

The most important element in matching consumption and tariff is clarity around the register content code and channel numbers. As we have answered in question 9, we believe there is a need to explicitly define how the register content code, period of availability and meter channel identifier supplied in consumption data can be mapped to the tariffs register content code and period of availability supplied in the EIEP14A/B.

We believe mandating the common practice outlined in section 4.7 of the consultation document is a solution to this issue. We prefer this approach as it leaves the least ambiguity about how to price data and how to match it to the 14B.

An edge case example of explicit expectations in the data definitions is the correct use of time. We applaud the strict adherence to ISO8601 and the clear description of daylight saving time change days. However, we often get EIEP13As with a rejection code, so only one DET line is supplied, with the HDR line containing the *Report period start date* & *Report period end date* set to 00/00/0000 because 'there is no report period'. It must be made clear that a valid ISO8601 date is required and should default to the report creation date.

We have provided detailed responses to the consultation questions in the attached submission form. We look forward to continuing to work with the Authority to strengthen New Zealand's retail electricity data infrastructure.

Terry Paddy
Cortexo Limited

# Appendix D Submission form

Consultation for *'Improving product information and consumption data exchange – proposals for new and updated standards: EIEP14B. EIEP 13A and EIEP13B'*

Please email your submission to consumer.mobility@ea.govt.nz by 5pm, Wednesday 24 June 2026.

| Submitter | Cortexo Limited |
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| Questions | Comments |
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| Q1. Do you agree that the proposed EIEP14B is consistent with the now prescribed EIEP14A? (If not, what further changes are required to achieve consistency?) | Yes |
| Q2. Is the proposed EIEP14B design suitable to enable customers, or agents acting on their behalf, to acquire specific, accurate, unambiguous information on their electricity plan? | Not completely, unless the specific tariff information includes when any free hour of power is and confirmation is provided that the billing period starts at midnight for any bill created. |
| Q3. What additional changes to attributes, structure or content, if any, do you recommend to the proposed EIEP14B to achieve the above objective? | In line with the obligation to supply future pricing where known, we believe there should be a requirement to supply historical rates for up to 2 years to allow for the correct pricing of a full 2 years' worth of EIEP13A consumption data. |
| Q4. Do you agree with the proposal not to include customer-specific attributes such as contact, meter configuration or billing information in EIEP14B, reflecting discussion at industry workshops? | Our primary concern regarding meter configuration is ensuring we have sufficient information to link the supplied EIEP13 data to EIEP14 unambiguously. We believe our suggested change to the EIEP13 specification achieves this without the need for meter configuration in the EIEP14 |
| Q5. Do you agree with the proposed key names within JSON objects in the EIEP13A and EIEP13B updates? | Yes |
| Q6. Do you agree with the proposal to minimise product information in the EIEP13 formats (such as making tariff name optional), reserving product information for the EIEP14 formats? | If the potential conflict between register content, meter channel number, billing register content and billing meter channel number is resolved, this tariff name can be optional. If the tariff name were mandatory, it would be significantly easier to price all data correctly. |
| Q7. Do the amendments to the Consumer Authorisation Code field clarify its use? If not, what further changes would provide clarification (e.g., would it be preferable to rename this field)? | Yes |
| Q8. Do the proposed updates adequately future-proof EIEP13A and EIEP13B so they provide sufficient information for foreseeable use cases? | No comment |
| Q9. Does the way we have specified the meter channel and register content codes in EIEP13A remain consistent across EIEP13A, EIEP14B, and the Registry information for the consumer's ICP? | We believe there is still some room for problematic interpretations of the specification.<br><br>Take the following anonymised example from real data received via EIEP13A.<br><br>DET,,1000000000BP000,000,,N000000000,X,7304,24,14/06/2026 00:00:01,14/06/2026 00:30:00,RD,1.45,0.00 |

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| | This meter is listed in the registry with the following channels:<br><br>• N000000000/1, register content: IN, flow direction: X<br>• N000000000/2, register content: EG, flow direction: I<br>• N000000000/3, register content: UN, flow direction: X<br>• N000000000/4, register content: UN, flow direction: X<br>• N000000000/5, register content: CN, flow direction: X<br>• N000000000/51, register content: 7304<br>• N000000000/52, register content: 7304<br>• N000000000/53, register content: 7304<br>• N000000000/54, register content: 7304<br>• N000000000/55, register content: 7304<br><br>Quoting Section 4, 4.7 & 4.8 of the consultation paper:<br><br>*4.7 For EIEP13A, a common practice seems to have been for retailers to provide half-hourly*<br>*consumption data with the tariff-quoted RCC-PoA pair (e.g. "UN-24") rather than the strictly*<br>*correct Register Content Code for the half-hourly channel (e.g. "7304-24").*<br><br>*4.8 An additional problem arises when the consumer attempts to reconcile the RCC-POA with*<br>*their ICP's registry information: "UN-24" matches channel 1, whereas the correct half-hourly*<br>*channel is 51 with RCC 7304. The retailer must then decide whether the EIEP13A record*<br>*should specify channel 51 or a channel that matches the quoted RCC - i.e. channel 1*<br><br>If this data were, in fact, for the Uncontrolled (UN) channel, our interpretation of the specification as written is that it would be valid to supply the data using meter channel 53 if that were the register physically recording the half-hour periods.<br><br>In the above example, if the retailer chose the RCC-POA 7304/53, this could correspond to the billing register N000000000/1, N000000000/3, N000000000/4, N000000000/5. The only way to determine the correct value would be to rely on the convention of subtracting 50 from the channel number. This ambiguity is unworkable and must be made explicit.<br><br>Our view is that this renders the data unmatchable to the EIEP14B, as neither the register code (7304) nor the channel number (53) appears in the 14B.<br><br>Mandating the common practice outlined in section 4.7 of the consultation document is a solution to this issue. We |

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| | prefer this, as it leaves the least ambiguity about how to price data and how to match it to the 14B. This solution also correctly handles meter configuration changes.<br><br>Alternatively, this discrepancy can be resolved by specifying (per section 4.8) that the meter channel number must correspond to the register that holds the billing register for the data. For the above example, this would be meter channel number 1.<br><br>We believe this is viable as some retailers already supply the billing meter channel number, as in the following example, where the channels /3 and /4 correctly allow the identification of the billing register content UN and CN:<br><br>DET,,0000000000TU000,000,,N200000000/3,X,7304,24,31/10/2025 23:30:01,31/10/2025 24:00:00,RD,0.01,<br>DET,,0000000000TU000,000,,N200000000/4,X,7304,17,31/10/2025 23:30:01,31/10/2025 24:00:00,RD,0,<br><br>For reference, the registry lists the channels for this meter as<br><br>• N200000000/1, register content: UN, flow direction: X<br>• N200000000/2, register content: EG, flow direction: I<br>• N200000000/3, register content: UN, flow direction: X<br>• N200000000/4, register content: CN, flow direction: X<br>• N200000000/51, register content: 7304, flow direction: X<br>• N200000000/52, register content: 7304, flow direction: I<br>• N200000000/53, register content: 7304, flow direction: X<br>• N200000000/54, register content: 7304, flow direction: X<br><br>Additionally, when the retailer applies a correction to the data, either for estimates or other reasons, we have previously observed that these can be supplied with a start and end time of a single point in time, which makes it impossible to correctly apportion the usage over the period it was assessed.<br><br>We believe the specification should require that all use specifies the correct start and end for the usage as billed i.e in the case of a correction the start and end times should relate to the period the correction has been applied for.<br><br>It is important that the specification is clear about the register content codes that are to be used with estimated correction values. It must be possible to determine which data points must be added to get the total consumption |

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| | and which data points are the NHH reads of data that are also supplied as HH data on another register.<br><br>Alternatively the specification must require that no duplicate data is supplied i.e HH data for a register (7304/51) AND NHH data under a different register code (UN/1). In practice we have seen retailers supplying data this way. This could be accomplished through a change in business requirement 4 of the EIEP13A specification to indicate that ONLY the most granular data must be supplied.<br><br>Regardless of which solution is chosen, we believe it is critical to be explicit about expectations regarding register content and meter channel number, and not to permit the retailer to decide how this will be treated. Experience shows that the different interpretations are unmanageable. This is critical to ensure that the data from the revised EIEP13 can be correctly matched to EIEP14. |
| Q10. Do you agree with the Authority's conclusion that, assessed against the criteria described in section 5.3 of the consultation paper, the proposals for the new EIEP14B and modernised EIEP13A and EIEP13B format will collectively support informed consumer choice by enabling more accurate and consistent plan comparison and a more efficient and competitive market? | Yes |
| Q11. Do you have further comments on whether the EIEP14B format proposals and EIEP13A and EIEP13B updates support informed consumer choice? Do they equip a third party, for example, a (non-technical) budget advisor, with sufficient information to advise a consumer on their best plan options? If not, what would you change? | Yes, the proposed updates, with solutions to the highlighted issues, would allow a third party to perform the plan calculations. |
| Q12. Do you agree with the way that we have specified how gaps in the data should be displayed? For example, there is a non-communicating period, resulting in a gap in half-hourly data. | We have an issue with data gaps. They mean that the consumption data cannot be priced correctly to match the bill. However, the retailer has generated a bill for the customer, so there should be no gaps, but the content should be what the retailer estimated to enable it to bill the client. |
| Q13. While noting that the primary use case is to support residential and small business information exchange, do you propose any additional changes to accommodate the needs of cmercial and industrial users? | Yes |
| Q14. Do you have any other comments on the Authority's proposals for EIEP14B, EIEP13A and EIEP13B? | No, however we noted a reference error in Appendix_B_-_Electricity_Information_Exchange_Protocol_EIEP13A.pdf, Protocol specifications, 2b. |