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Improving product and consumption information exchange – proposals for new and updated standards (EIEP14B, EIEP13A and EIEP13B)

Submitter: Genesis Energy Limited

Responses to Consultation Questions

Question	Genesis Response
EIEP14B – Consumer's product information	
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?	The proposed EIEP14B design is suitable for customers or agents to acquire the prescribed information on their plan. This information will be useful to agents with the technical expertise to ingest and decipher the file (machine focussed). The process and design is not suitable for customers to receive their electricity plan information in an easily understood and usable format (consumer focussed). Although there is consistency of tariff rates excluding GST across EIEP12, 14A and 14B, these are not consistent with the new "Better Bills" requirement where charges are to be displayed as GST inclusive. This may result in ambiguity.
Q3. What additional changes to attributes, structure or content, if any, do you recommend to the proposed EIEP14B to achieve the above objective?	
Q4. Do you agree with the proposal not to include	Yes.

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customer-specific attributes such as contact, meter configuration or billing information in EIEP14B, reflecting discussion at industry workshops?	
EIEP13A and EIEP13B updates	
Q5. Do you agree with the proposed key names within JSON objects in the EIEP13A and EIEP13B updates?	
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?	Yes. Our comments on the specific changes are set out below. Change 1: JSON is a machine-readable friendly format that supports automation. It is not consumer or consumer-advocate friendly. Change 2 (see Q11): This change makes the time periods in the EIEP13A file format, which are currently easily understood and used by machine and person, more confusing and complex. Non-machine users will now need to convert the timings into NZDT to make any sense of them. Genesis supports the move to ISO8601 itself, consistent with our 26 March 2026 submission; the concern is the loss of the human-readable time fields, not the format. Change 3: noted. Change 4: noted. Change 5: Please include filename examples, as requested in pre-consultation workshops. This is very important for EIEP13C, where new agents use "EIEP13C" as the file type instead of "REQCONS". Change 6: noted. Change 7: noted. Change 8: Supported. Change 9: Supported. Clearer reject code explanations would be helpful – for example, where a request has an invalid ICP, both codes 001 and 002 could seemingly apply. Change 10: see Q7.

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	Change 11: Agree. Change 12: noted. Change 13: Agree. Change 14: No objection. The change to the num format (12.2 to 12.4) sets a maximum of four decimal places, not a fixed requirement, so retailers can continue to provide fewer where appropriate. We note the rationale of increased precision is not clear for EIEP13, which supports occasional cost comparison on individual ICPs, where the difference between two and four decimal places is immaterial. The high-volume EIEP1, 2 and 3 billing files, which use two decimal places, would be a more impactful target if register-level precision were a genuine concern.
Q7. Do the amendments to the Consumer Authorisation Code field clarify its use? If not, what further changes would provide clarification (eg would it be preferable to rename this field)?	Change 10 - No. There are no drafted changes to the Consumer Authorisation Code field in EIEP13A. The field from 13A has been replicated in 13B, which provides consistency, but it does not clarify the field's use. The "Unique request identifier" in the response file header row is the link between the response and the request, not the Consumer Authorisation Code. The purpose of the Consumer Authorisation Code remains unclear, and this is reflected in its non-use by, in our experience, all requestors. One potential use of the field is for consumers to provide an authorisation code of their own for agents to use when requesting data from a retailer. A retailer with doubts about the validity of an agent's request could then contact the consumer to confirm whether the code is valid. As the consumer could also confirm whether they have authorised an agent without a code, a code may not be necessary in this scenario.
Q8. Do the proposed updates adequately future-proof EIEP13A and EIEP13B so they provide sufficient information for foreseeable use cases?	Likely. It is more important that any updates correct existing weaknesses and reflect today's requirements without introducing unnecessary complexity and cost.
Q9. Does the way we have specified the meter channel and register content codes in	Yes. Using the cumulative settlement register codes (UN/CN/IN/D/N) rather than the absolute registers

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EIEP13A, maintain consistency across EIEP13A, EIEP14B and the Registry information for the consumer's ICP?	(7304/7306) provides more granularity and maintains consistency across EIEP1, 12, 13, 14 and the Registry. We note the divergence raised at paragraphs 4.7 to 4.9, but consider it is framed on the simplest case, a single-register UN meter, where one UN stream equals one 7304 stream. For a UN/CN or controllable-load meter, an absolute 7304 stream in EIEP13A/B aggregates the loads, so the recipient cannot separate them to apply the UN/CN (or PK/OP/SH/CN) rates carried in EIEP14A and 14B. Non-half-hourly meters have no absolute channel at all. If retailers are not uniform in their use of absolute and cumulative codes, recipients cannot align EIEP13 with EIEP14 to calculate costs or compare plans across retailers. While separately recorded and priced controllable load exists, absolute RCC codes should be avoided. We therefore support the Authority settling this with a single normative convention based on the cumulative codes, which the file specifications already permit (consistent with SD-020), accompanied by a worked example covering the UN/CN multi-register case.
Supporting informed consumer choice	
Q10. Do you agree with the Authority's conclusion that the proposals for the new EIEP14B and updated 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?	Although most of the Authority's assessment criteria may be met by the proposed changes, we have concerns related to feasibility and implementation risk. If the Authority makes a final decision on this consultation in July, retailers would have a very short timeframe (three months) to build and test 14B, and to update and test 13A/B. If changes are delivered and tested in a rushed manner, there is an increased risk that file validity is not correct. The flow-on effect is poor data entering agent systems (primarily Billy) and consumers losing faith in the industry comparison tool. A six-month implementation period would be preferred, as this allows more time for development and testing of a consumer-facing output. As Genesis is in the process of closing two billing systems and transitioning onto two new systems, we would be seeking a specific limited exemption to avoid sinking costs into the end-of-life systems.

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Q11. Do you have further comment 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?	The EIEP14B format proposals and the EIEP13A and EIEP13B updates support informed consumer choice when used in conjunction with technical third-party applications (e.g. Billy). The proposed changes are likely to work. EIEP14A and 14B do have sufficient information, but we suggest that the complex format used does not equip a non-technical third party, such as a budget advisor or community welfare support person, to advise a consumer on their best plan options.
Q12. Do you agree with the way that we have specified how gaps in the data should be displayed? For example where there is a non-communicating period, resulting in a gap in half-hourly data.	
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 commercial and industrial users?	Use for C&I users may not be appropriate. C&I pricing is more bespoke and commercially sensitive.
Q14. Do you have any other comments on the Authority's proposals for EIEP14B, EIEP13A and EIEP13B?	