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ERGANZ SUBMISSION ON IMPROVING PRODUCT AND CONSUMPTION INFORMATION EXCHANGE: EIEP13C AND EIEP14C

The Electricity Retailers' and Generators' Association of New Zealand ('ERGANZ') welcomes the opportunity to comment on the Electricity Authority's consultation paper 'Improving product and consumption information exchange – electronic request form: EIEP13C and EIEP14C', dated 17 September 2026.

ERGANZ is the industry association representing companies that generate and sell electricity to Kiwi households and businesses. Collectively, our members supply almost 90 percent of New Zealand's electricity. We work for a competitive, fair, and sustainable electricity market that benefits consumers.

Executive summary

ERGANZ understands this consultation completes the Authority's programme to regulate EIEP14 and modernise EIEP13, following publication of EIEP14A in April and of EIEP13A, EIEP13B and EIEP14B in August. The C formats are request mechanisms only. Retailers' obligations to provide consumption and product information in the prescribed formats apply from 30 October 2026 whether or not the C formats are in place.

Within that scope, these proposals are sensible. ERGANZ supports the Authority's decisions not to embed real-time consent in the request file, not to build a consent register into the registry transfer hub, and not to extend EIEP14C to EIEP14A files. ERGANZ agrees with the Authority's reasoning for each, that the more ambitious option would duplicate Open Electricity or cost more than it returns.

The same reasoning applies to the C formats themselves. Under the Government's designation decision, retailers must provide customer and product data to accredited requestors from 1 July 2027. The designated data covers substantially the same ground as EIEP13A, EIEP13B and EIEP14B, including up to two years of half-hourly consumption and the details of the consumer's plan. Open Electricity delivers that data through APIs, with its own accreditation and consent framework.

Based on the Authority's timetable, retailers build EIEP14C after 30 October 2026 and it then operates for around eight months before a better channel is implemented for the same data. ERGANZ questions whether further investment in file-based request mechanisms is the best use of

the sector's change capacity, which is already committed to the 30 October go-live, the billing changes, switching reform and the Open Electricity build itself.

For the same reason, ERGANZ recommends the Authority set the commencement date as 1 April 2027 for the updated EIEP13C and the new EIEP14C. Retailers are carrying an extremely high load of concurrent regulatory change, concentrated in the data, customer and compliance teams. Those teams are already delivering the EIEP13 and EIEP14 go-live and the billing changes on 30 October 2026, switching reform and preparation for Open Electricity. A 1 April 2027 date allows retailers to complete and stabilise the 30 October changes before taking on new request formats, and avoids an implementation period that runs over summer, when change capacity is at its lowest.

ERGANZ is not asking the Authority to abandon the C formats. The changes are modest, they give requestors a standard format in the interim, and they reflect what the industry asked for in workshops. Instead, ERGANZ recommends that the Authority and MBIE agree and publish a joint transition plan that treats Open Electricity as the mechanism for exchanging consumption and product data from 2027. This plan should state that the C formats are interim and set a review point tied to the commencement of Open Electricity. It should also confirm that no further EIEP request or consent mechanisms will be developed before then. It should carry the EIEP13 and EIEP14 data definitions into the Open Electricity standards, so that retailers can map their data once. And it should explain how customer authorisation codes issued under the C formats relate to consent given under Open Electricity, so that consumers and retailers do not maintain two consent records for the same data.

Part 11 of the Code requires retailers to provide consumption and product information in prescribed EIEP formats to consumers and to any agent a consumer authorises. Open Electricity serves accredited requestors. If the two regimes are not reconciled, retailers will run both channels indefinitely and the EIEP route becomes permanent by default. ERGANZ asks the Authority to commit to amending the Code so that providing data through Open Electricity satisfies the corresponding Part 11 obligation.

ERGANZ also asks the Authority and MBIE to identify the requestors that the Code serves today that Open Electricity will not, such as budget advisers and community energy advisers acting under written authority who are unlikely to seek accreditation, and to decide how each will be served. The proposal at paragraph 4.29, that retailers give consumers a plain-language account of their plan alongside an EIEP14B file, is an example of a consumer requirement Open Electricity should be designed to meet from the outset rather than one left in an EIEP procedures document.

Members are also concerned that the paper does not address how retailers are to manage the privacy risk of releasing more consumer information to third parties, particularly agents.

Privacy risk and access controls

The C formats are intended to make requests for consumer information easier to send. If they succeed, retailers will release more personal information to third parties. Paragraph 4.11 places responsibility on retailers to assure themselves that a request is genuine and to confirm the

authorisation given, and notes that retailers are responsible for complying with the Privacy Act 2020. However, the paper does not say how retailers should discharge that responsibility.

Members have identified five questions the paper does not address. It does not say what checks a retailer must complete before releasing information; whether the retailer, the requestor or both are responsible for verifying the requestor's identity and authority; what evidence of consent must be retained, and for how long; how a retailer should handle suspected fraud, mismatched information or revoked authority; or whether a retailer that relies on a requestor's declaration or an authorisation code has any protection if that authority later proves invalid.

The last question goes to the retailer's legal position. Under information privacy principle 11, a retailer may disclose personal information where it believes on reasonable grounds that the disclosure is authorised by the individual concerned. The paper does not say whether a requestor's declaration, or a customer authorisation code, is enough to meet that test. Paragraph 2.6 describes parties with access to the registry transfer hub as trusted by retailers. Hub access establishes who a requestor is. It does not establish that the requestor holds a particular consumer's authority for a particular request.

Agents present the greatest risk, because the retailer has no direct relationship with them and the paper sets no standard for who may act as one, as opposed to the Open Electricity regulations. If EIEP13 and EIEP14 increase the number of requests and the volume of information shared, then the controls should increase as well.

ERGANZ recommends the Authority address these questions in the EIEP13C and EIEP14C procedures documents before the formats commence. The procedures should set the minimum verification steps a retailer is expected to complete, so that a retailer completing them can demonstrate it has acted on reasonable grounds. They should allocate responsibility for verifying identity and authority between retailer and requestor, and require requestors to hold evidence of authority and produce it on request. They should set a retention period for consent evidence and a process for suspected fraud, mismatched details and revoked authority, including how a revocation reaches the retailer. ERGANZ also asks the Authority to strengthen access controls for agents, including the conditions for access to the registry transfer hub and a means for the Authority to suspend a requestor that misuses it.

Open Electricity deals with these issues through accreditation, a consent framework and regulatory oversight of accredited requestors. This is a further reason to treat the C formats as interim.

Response to consultation questions

Questions	Comments
Q1. Do you agree with the proposed changes/updates to EIEP13C? If not, what would you change?	ERGANZ supports the proposed changes. Individual members may comment on operational detail. Two points for the procedures document. First, the new filtering fields (request dates, meter channels and reactive energy) are

Questions	Comments
	requests a responder may decline to apply. The response should state whether filtering was applied, so a requestor can tell a filtered dataset from a full one. Second, making customer number, customer name and ICP identifier mandatory helps retailers match requests to accounts. The procedures document should say how retailers treat a request where those fields do not match exactly, for example where a name is recorded differently on the account.
Q2. Do you agree with these changes also being reflected in the proposed EIEP14C where indicated? If not, what would you change?	Yes. Consistency between EIEP13C and EIEP14C keeps the build small and lets retailers reuse their EIEP13C processes.
Q3. Do you agree with our proposal for EIEP14C to only request EIEP14B files? If not, do you think adding the capability for EIEP14C to also request EIEP14A files would be worth the complication of the file format?	Yes. EIEP14A information is public and needs no consent. Adding it to EIEP14C adds complexity for no benefit.
Q4. Do you agree with our proposal not to include an automatic electronic authorisation consent system within the EIEP14 suite?	Yes. An electronic consent system within the EIEP suite would duplicate the accreditation and consent framework MBIE is building for Open Electricity, and retailers would incur additional compliance costs. ERGANZ applies the same reasoning to the C formats more generally, as set out in the executive summary.
Q5. Do you agree with our proposal to use a customer authorisation code within the EIEP14C file as the mechanism to indicate customer consent? If not, why not?	Yes, as an interim mechanism. The code reflects current industry practice and is optional, which ERGANZ supports. Paragraph 4.16 suggests retailers would be expected to record consent evidence and issue codes. ERGANZ asks that the procedures document present code issuance as available to retailers and requestors who agree to use it, rather than as a new obligation, given the expected life of the format. A code helps a retailer locate a consent record. It does not displace the retailer's obligations under the Privacy Act 2020 to satisfy itself that consent is valid. The wider privacy questions this raises are set out under 'Privacy risk and access controls' above.

Questions	Comments
Q6. Should the authorisation code and statement of written authority be common between EIEP13s and EIEP14s? If so, should this be made explicit within the C formats?	Yes, and the C formats should state this. Where a consumer has authorised access to both consumption and product information, one authorisation should cover both. The Authority and MBIE should also state how these authorisations are treated once Open Electricity commences, including whether they carry over, lapse or must be obtained again.
Q7. Do you agree with our proposal for EIEP14C files to support both JSON and CSV formats? If not, why not?	Yes. Retailer and requestor systems differ, and both formats are needed in the interim.
Q8. What is the sector readiness to adopt JSON as the default file format for EIEP14C files? If your organisation does not currently support JSON, when might this be feasible?	ERGANZ does not hold this information. Readiness varies by retailer and members will respond individually. Paragraph 4.21 notes that JSON will be required under Open Electricity, so retailers designated as data holders are building that capability for July 2027. Making JSON the default for EIEP14C adds little that Open Electricity does not already deliver.
Q9. Should a field be included in EIEP14C to allow nomination of either JSON or CSV file formats? Is there value in allowing requestors to specify the expected response format, noting that CSV has been nominated as the default format?	An optional field allowing a requestor to state a preferred format is low cost and reasonable. It should not oblige a retailer to respond in the nominated format, and a retailer that cannot supply JSON should be able to respond in CSV.
Q10. Would aligning data standards for requests for consumption and product information reduce development costs, or are the bulk of the costs associated with the implementation of JSON data formats and real-time authentication processes?	Members are best placed to quantify development costs. ERGANZ's view is that aligning EIEP13C and EIEP14C reduces cost at the margin. The larger cost is running a file-based request channel through the registry transfer hub alongside an Open Electricity API channel for the same data. The transition plan described in the executive summary is intended to manage that cost.

Questions	Comments
Q11. Do you foresee any issues with the proposed requirement for retailers to treat consumer requests for their plan information as if they were EIEP14C requests for EIEP14B files?	Members are best placed to comment on operational issues. ERGANZ makes two points. First, most consumers who phone or email their retailer about their plan want to understand it rather than receive a data file. Retailers should be required to offer the EIEP14B file and provide it on request, rather than send it in every case. Second, the plain-language element overlaps with plan and billing information retailers already provide under other Code requirements. ERGANZ asks the Authority to confirm how the new requirement relates to those obligations, and whether a procedures document is the right instrument for a new obligation on retailers of this kind.
Q12. Do you believe this proposal would ensure consumers are provided with the necessary information to compare electricity plans?	In part. EIEP14B tells a consumer which plan they are on. Comparing plans also needs consumption data from EIEP13A or EIEP13B and information on alternative plans from EIEP14A. Together these give a consumer or their agent what a comparison requires. EIEP14B on its own does not.
Q13. Is the proposed EIEP14C request sufficient for third parties to electronically request EIEP14B files? If not, what would you suggest to achieve this?	Third-party requestors are best placed to answer this question. ERGANZ has no view.
Q14. Do you agree with the Authority's view that implementation of EIEP13C and EIEP14C would be straightforward, for the reasons given above? If not, why not?	Broadly yes for EIEP13C, which updates an existing format. EIEP14C is a new build, although a small one. The issue is timing and value more than difficulty. The EIEP14C build follows immediately after the 30 October 2026 go-live, competes with other changes to the same retailer systems, and delivers a channel with a short expected life. ERGANZ recommends the Authority set commencement for both EIEP13C and EIEP14C at 1 April 2027, for the reasons set out in the executive summary, rather than assume readiness from 30 October.
Q15. What additional development effort is required to be able to process EIEP13C and EIEP14C requests beyond what has already been	Members are best placed to answer.

Questions	Comments
done to implement EIEP13A, EIEP13B, EIEP14A, and EIEP14B, if anything?	
Q16. If there is a period between implementation of EIEP13A, EIEP13B, and EIEP14B, and the implementation of EIEP13C and EIEP14C, cause issues for third party access to consumption and/or product information? If so, how might these be mitigated?	ERGANZ does not expect material issues. Retailers' obligations to provide information in the prescribed formats apply from 30 October 2026 regardless of how a request arrives, and requestors can use existing channels in the interim. This remains true even if the 1 April 2027 commencement that ERGANZ proposes is enacted, so a later date for the C formats does not delay third-party access to the information itself.
Q17. Do you agree with the Authority's view that the proposals for the new EIEP14C and updated EIEP13C formats would collectively support informed consumer choice by enabling more accurate and consistent plan comparison and a more efficient and competitive market?	The proposals improve on the status quo, and ERGANZ supports them on that basis. ERGANZ asks that the Authority's decision assess the efficiency and proportionality criterion, and the strategic alignment criterion, at paragraph 6.2 against the expected life of the C formats once Open Electricity commences. Most of the gains in plan comparison and competition described in this question will come from Open Electricity. The C formats serve the period until then.

Conclusion

ERGANZ thanks the Authority for the opportunity to comment on this consultation paper.

If there are any outstanding questions or a need for further follow-up, please let me know.

Yours sincerely,

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