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Submission on Enabling Consumer Mobility by Improving Access to Electricity Product Data

Introduction

1. Bluecurrent welcomes the Electricity Authority's (the Authority) consultation paper on *Enabling consumer mobility by improving access to electricity product data* (the Consultation Paper), dated 15 July 2025.
2. The Authority is proposing to standardise product data through the replacement of the current voluntary Electricity Information Exchange Protocol 14 (EIEP14 - *Retail tariff rate notification*) with a regulated modular suite of new protocols enabled by application programming interfaces or APIs (EIEP14A, B, C and D - the "replacement EIEPs"). The replacement EIEPs would make it mandatory for power companies to share standardised plan and tariff information and enable secure, on-demand digital requests from accredited third parties. This proposal is intended to lay the groundwork for real-time switching, clearer bills, and fairer pricing that will enhance 'consumer mobility'.
3. As a smart metering and data services provider, Bluecurrent does not play a direct role in implementing the current EIEP14 and envisage that to be the case under the replacement EIEPs (noting that further EIEP evolutions could change this arrangement). The adoption of standards for the API-enabled replacement EIEPs, however, may have implications for our potential role(s) under the proposed Consumer Data Right (CDR) for the electricity sector.
4. We support the adoption of widely agreed industry standards that are compatible with broader data access frameworks, including the alignment of the replacement EIEPs with the proposed electricity CDR. We believe this will minimise the regulatory burden and compliance costs, and enable seamless integration between the two frameworks over time – enhancing consumer mobility.

Responses to the consultation questions

Realising the future of consumer mobility through better access to data

- Q1.** Do you agree that improving access to product data will support consumer mobility through enabling innovation and informed choice?
- Q2.** Are there any other aspects of improving access to data that the Authority should be considering? Are there further benefits that we have not articulated?
- Q3.** Do you agree that creating standards for the exchanging of product data should be aligned with a potential future electricity Consumer Data Right (CDR)? Why, or why not?
- Q4.** Are there additional opportunities or risks the Authority should consider in aligning improved access to electricity product data with a potential CDR designation and implementation?
- Q5.** Do you have any views on the interaction between the definitions of "generally available retail tariff plan" within the Code and "product data" within the CPD Act? Are these definitions easily reconciled? Do they capture the same information?

5. Bluecurrent broadly agrees that improving access to product data will support consumer mobility by enabling innovation and informed consumer choice.
6. There is more than one way of improving access to product data, one of which is through an improved comparison and switching service. We note the Authority's recent appointment of a new comparison and switching service provider that is expected to "enable consumers to cut through the complexity to get more control over their energy bills" and "leverage emerging technologies, improvements in data standardisation and a future consumer data right".¹
7. Another way is through more transparent disclosure of product information by the service providers themselves, e.g. publishing information about their offerings on their websites that consumers can easily access. Regulatory and market arrangements that ensure competition in the retail market provide incentives for service providers to keep innovating and publishing information about their new or improved products to retain existing customers and attract new ones.
8. Greater standardisation, enabled by the replacement EIEPs, would provide a level of consistency in terms of speed and formats for the cost-effective delivery of product data. This will minimise confusion for industry participants and consumers, and avoid unnecessary compliance costs that will ultimately be borne by consumers. Importantly, this will enable third parties to cost-effectively develop new products that benefit consumers in a timely manner.
9. We strongly believe the development of standards for the exchange of product data under the replacement protocols should be aligned – to the greatest foreseeable extent – with the proposed CDR for the electricity sector. The potential benefits of an electricity CDR can be better realised if it is designed to interact seamlessly with the *Electricity Industry Participation Code* (the Code - including EIEPs) and ongoing and impending data-related reforms undertaken by the Authority.
10. We believe the definitions of "generally available retail tariff plan" within the Code and "product data" within the *Customer and Product Data Act* should be aligned to the extent possible for the reasons stated above. We consider the product data being considered by the Ministry of Business, Innovation and Employment (MBIE) for the proposed electricity CDR to be important for consumers. It includes: 1) tariff/pricing plans, 2) plan types, e.g. time-of-use, flat rate, 3) network, 4) required meter type/configuration, and 5) additional fees, discounts, credits or other benefits.²

The status quo: current settings for obtaining product data are not fit for a data-enabled electricity future

Q6. Do you agree that the current data access arrangements (eg, clause 11.32G, non-regulated EIEP14 and bilateral agreements) are no longer fit for purpose to promote a digitalised electricity industry that enables the on-demand sharing of electricity information?

Q7. Have you encountered specific operational or compliance barriers when trying to access or share product data?

Q8. What are the most significant friction points for consumers when comparing and switching electricity plans today?

Q9. How would better access to standardised and on-demand product data improve outcomes for consumers and/or your organisation?

11. Bluecurrent supports greater digitalisation that promotes market competition and innovation that benefits consumers. We support greater standardisation that facilitates the evolution of data access frameworks that enable: 1) service providers to deliver a wider range of new and improved products, and 2) consumers to switch providers with ease – improving consumer mobility and energy affordability.

¹ <https://www.ea.govt.nz/news/press-release/electricity-authority-appoints-daylight-to-deliver-new-comparison-and-switching-service/>

² <https://www.mbie.govt.nz/dmsdocument/29086-discussion-paper-exploring-a-consumer-data-right-for-the-electricity-sector-pdf>, page 24

12. Beyond the Code and the CDR, we consider it important that any future EIEP and electricity CDR data access arrangements will not interfere with existing commercial agreements and other ways of accessing data. This includes the ability to agree alternative access terms outside of the EIEP and CDR frameworks. This will ensure that consumer choice (in how consumers access data) is protected, including the ability to choose the access mechanisms that work best for different consumers, especially at the 'edge of the market' where a lot of innovation and disruption happen. There is a universe of data that cannot conceivably be covered by EIEPs and the electricity CDR, and consumers' and service providers' access to this data should not be limited should they wish to access and use it to develop new and innovative products.
13. In response to Q7, Bluecurrent is a smart metering and data services provider and is not a data access seeker under current regulatory and market arrangements. We believe that data access seekers – such as electricity consumers, retailers, distribution networks, and flexibility service providers – are better placed to respond to this question. (Note: In relation to retailers, Bluecurrent has been a data provider for retailers seeking to fulfil consumer data requests. We often perform this function when consumer data requests occur in large numbers, i.e. hundreds of ICPs.)
14. In response to Q8, one of the most significant friction points when consumers compare and switch electricity plans today is making like-for-like comparisons. For example, some end consumers may not have control or have little understanding of how their distribution network manages their hot water load and its impact on their tariffs, which can be influenced by several variables. Some consumers may not have the appreciation of choosing a plan that includes controllable load (vs none) that could lower their power bills. As such, the impact of controllable load (such as hot water) on tariffs may need to be explicitly included as part of the product information that will be provided under the replacement EIEPs, e.g. day and night pricing.
15. We note that smaller retailers are less likely to have the wherewithal to implement innovative energy pricing to the same extent or sophistication as large retailers, and therefore rely heavily on load control. They could benefit from more consumers being able to make like-for-like comparisons from an array of pricing plans. This becomes more important as the range of plans is expected to expand with the requirement on retailers with market shares of 5% or more to offer time-of-use pricing plans by 1 July 2026.³
16. In response to Q9, we agree that improving access to standardised and on-demand electricity product data would:
 - (a) make switching faster and easier
 - (b) improve affordability through greater competition and pricing transparency
 - (c) enable tailored advice and innovation from third-party services
 - (d) promote trust and fairness by reducing confusion and making the system more user-friendly.⁴

Proposed options to improve access to electricity product data, how our preferred option will benefit consumers, and options analysis

Q10. Do you agree with the proposed assessment criteria (effectiveness, efficiency, feasibility, and strategic alignment)? Are there other criteria we should consider?

Q11. Do you have a view on which option (status quo, regulated EIEP14, new modular EIEPs) would deliver the most benefit and why?

Q12. Do you agree with our preliminary assessment of the options presented above?

Q13. Are there elements of the existing EIEP14 that could be adapted or strengthened rather than replaced?

³ <https://www.ea.govt.nz/projects/all/energy-competition-task-force/consultation/new-ways-to-power-electricity-consumers/#:~:text=11%20April%202025-,Decision,available%20by%201%20July%202026>

⁴ Consultation Paper, pages 16-17

Q14. Are there any other barriers to using EIEP14 that we have not identified?

Q15. If option 3 (new modular EIEPs) is pursued, how should we best sequence implementation to ensure deliverability and minimise disruption?

Q16. If option 3 is pursued, do you think the proposed EIEP14B (all electricity plans) should capture historic offers to capture all current and legacy plans?

Q17. If option 3 is pursued, are there practical limitations the Authority should consider? (For example, should plans that have no active customers, or highly specialised plans such as internal staff discounts, be included?)

Q17a). If limitations are appropriate, how should these be defined to ensure the protocol remains comprehensive and useful for consumers and third-party service providers?

Q18. What practical limitations (if any) should apply to third-party requests for tariff data?

Q18a). Do you think any interim measures should be considered as part of the new protocols, to facilitate the transition to the on-demand access to product data? If so, what are your suggestions?

Q18b). What additional provisions are needed to maintain data continuity during retailer exits, mergers, or other significant business changes?

Q19. Should each electricity plan be required to have a unique identifier to help consumers and third parties distinguish between plans with the same or similar names?

Q19a). If yes, how should the unique identifier system be designed and administered to ensure that it is practical, consistent and does not add unnecessary compliance costs?

17. Bluecurrent suggests two assessment criteria, in addition to those identified in Q10:

- a. innovation not being stifled, i.e. the adoption of any standards should not preclude parties from entering alternative data access arrangements outside of the EIEP and CDR frameworks, for example, to provide highly customised services or support experimentation; and
- b. the cost of implementing the replacement EIEPs not resulting in price spikes for end consumers.

18. We propose that the Authority (preferably in conjunction with MBIE) create, formally or informally, a standing group of technical experts on data standards representing a wide range of sector participants. Such a group can make recommendations around:

- a. the standards and protocols that would be appropriate for API-based access in the increasingly digitalised electricity system, including identifying the point where standardisation / data conversion happens following the release of data by the data holder;
- b. the appropriate privacy and security settings, including practical limitations that should apply to third-party requests that would ensure any new data access arrangements and their evolutions will be robust;
- c. the timeframes for the IT system changes required to enable (greater) standardisation in the transfer or sharing of data;
- d. interim measures to facilitate the transition to on-demand access to data;
- e. other technical issues such as the need for unique product data identifiers to help consumers and third parties distinguish between plans with similar names;
- f. any compliance or assurance mechanisms beyond the Code that would support effective data quality and adherence; and
- g. other considerations that could facilitate greater digitalisation and the evolution of data frameworks, including insights from successful overseas models.

19. In our view, any interim measures to facilitate the transition to on-demand access to product data should be compatible with any proposed arrangements for the electricity CDR. The development of any

such measures could benefit from greater certainty around timeframes for the proposed electricity CDR.

Proposed implementation

Q20. Do you have any feedback on how these new protocols could be implemented?

Q21. What are the likely implementation costs (systems, processes, resourcing) for your organisation, and how could these be minimised?

Q22. What support, if any, would you find helpful during implementation (eg, technical guidance, test environments)?

Q23. What compliance or assurance mechanisms (beyond Code compliance monitoring) would support effective data quality and adherence?

20. See our suggestion in our response to Q10-Q19a regarding the establishment of a standing group of experts that will support the development and implementation of data standards and protocols and evolution of data frameworks for the electricity sector.
21. As indicated in paragraph 3, Bluecurrent does not have an active role in implementing the current EIEP14 and may not be subject to (significant) implementation costs to enable the replacement EIEPs. The standards that will be used for this purpose, however, will have implications for any role(s) we will choose – or be mandated – to play under the proposed CDR for the electricity sector.

Next steps

Q24. How would you like to be involved in co-designing the new product data protocols? Are there any specific parties that the Authority should be consulting with to help design these protocols?

Q25. Are there specific technical standards, platforms, or international practices the Authority should consider in designing API-based access?

Q26. Do you have any feedback on the proposed implementation timeline, or additional risks or dependencies we should factor in?

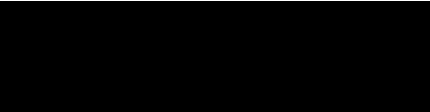
22. Bluecurrent would welcome the opportunity to be involved in co-designing the replacement EIEPs. We suggest that the Authority explicitly identify metering service providers as among the parties that should be consulted in the design of the replacement EIEPs and other new protocols for API-enabled data access.
23. Key considerations in designing API-based data access include the development of standards for:
 - a. the authorisation process – ensuring there is consent from the consumer whose data will be shared to an accredited third party; and
 - b. the verification process – verifying the identity of data access seekers, e.g. verifying that access seekers are who they say they are, or they are human and not machines/bots.
24. The implementation timeframe should consider that changes to IT systems do not often follow a linear process, e.g. there may be new features that require iterative testing, or are dependent on activities on the critical path of the system change process. We suggest embedding a grace period (i.e. when no breaches are recorded) in the implementation timeframe that would allow the relevant market participants to manage the post-implementation performance of their systems.

Concluding comments

25. Bluecurrent encourages the Authority to form a standing group of technical experts to support data standards development, including ensuring that new data access arrangements under the Code (including EIEP evolutions) align with the proposed CDR for the electricity sector. We would welcome the opportunity to contribute our expertise to any such group, drawing on our experience in the New Zealand and Australian electricity markets.

26. Please contact Luz Rose (Senior Regulatory and Policy Partner) at [REDACTED] if you have any questions or require further information.
27. No part of this submission is confidential, and we are happy for the Authority to publish it in its entirety.

Yours sincerely

A large black rectangular box redacting the signature of Matt Bostwick.

Matt Bostwick
Chief Customer Officer NZ