12 August 2025

Electricity Authority

By email to consumer.mobility@ea.govt.nz

Tēnā koe

Submission on improving access to electricity product data

Thank you for the opportunity to provide a submission on the consultation paper *Enabling consumer mobility by improving access to electricity product data* (the consultation paper).

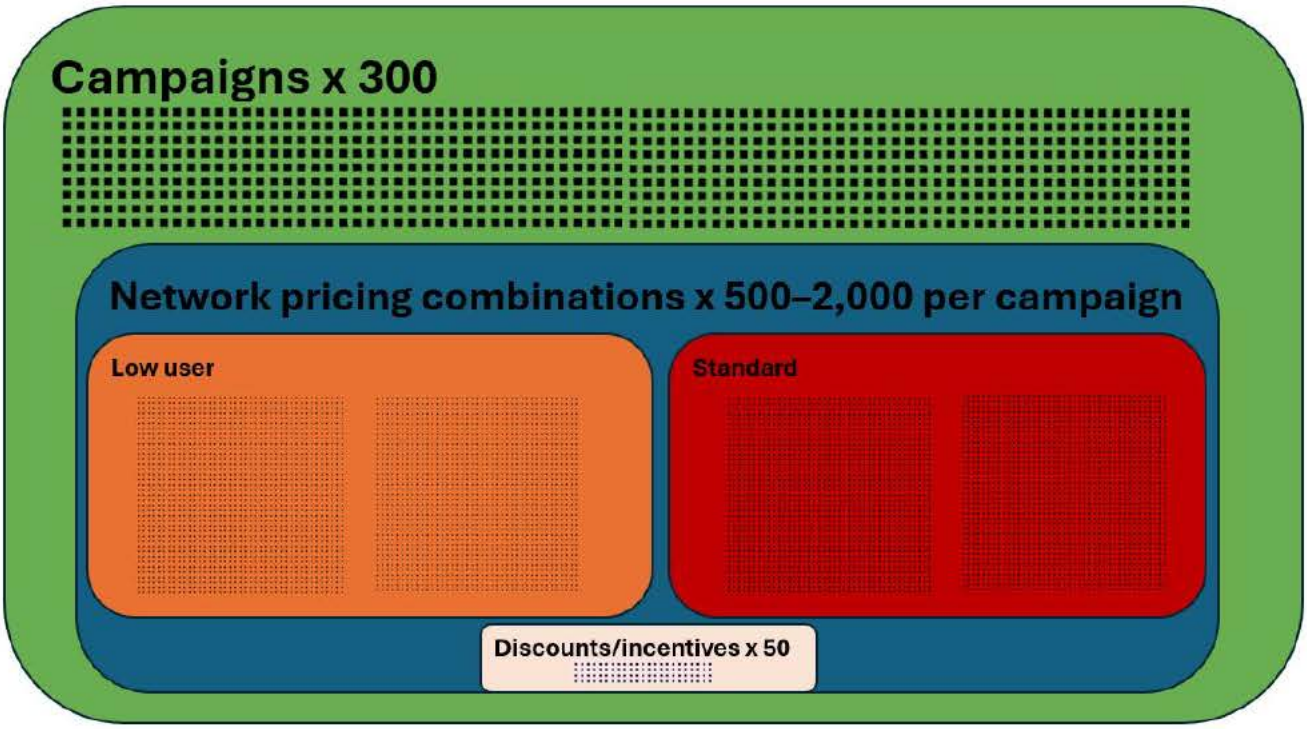
We support the Authority's goal of improving transparency and accessibility of electricity product data to empower consumers and foster innovation in the retail electricity market.

We agree that better access to product data is a critical enabler of consumer mobility. In our view, the development of regulated EIEP14 protocols that are fit-for-purpose has the potential to help achieve this. However, we believe that successful implementation will depend on careful design, strong alignment with MBIE's Consumer Data Right (CDR) framework, and a phased rollout that reflects the complexity of pricing structures and the operational realities of industry participants.

We strongly support the development of a high-quality EIEP14-A protocol that captures all relevant in-market product data. However, developing a protocol that can handle the complexity of modern electricity plans and pricing will be challenging, time-consuming, and require the involvement of a range of industry stakeholders. We note that the protocol will also need to allow for the comparison of Time-of-use (TOU) and non-TOU plans by accounting for changes to consumption patterns in response to free or discounted off-peak pricing. If the new protocol does not accurately reflect TOU plan consumption patterns, there is a risk that the uptake of TOU plans could drop significantly because the plans may appear more expensive than they actually are. We recommend that the EIEP14-A protocol should be prioritised as the foundational step that will offer immediate benefits to consumers and comparison platforms.

We do not support the proposed EIEP14-B protocol because we believe capturing all plan variants of existing customers, including the wide-range of bespoke discounts and pricing constructs, is infeasible and would impose significant costs with limited consumer benefit. Contact alone has hundreds of thousands of plan and pricing variations (as shown in the diagram below), and the number will continue to grow rapidly. We instead recommend that customer-specific product and pricing data be delivered through the EIEP14-C, which can be closely aligned with the EIEP14-A specification. We consider the implementation of the EIEP14-C protocol alongside the potential new consumption data protocol will make the most sense for customers and the industry.

Diagram A –The many thousands of permutations of campaigns, pricing and discounts.



We emphasise the importance of close coordination between the Authority and MBIE to ensure product data standards are fully compatible with the CDR framework. Misalignment risks duplication, confusion, and increased compliance costs. We recommend joint consultation and shared governance of the EIEP14 protocols and CDR customer and product data to oversee alignment and implementation.

As we noted in our recent submission to the Authority on evolving multiple retailing and switching, we highlight that this is only one of many EA programmes of work underway or on the near horizon which often results in prioritisation and shared resource competing against itself. We have significant concerns that the volume of regulated project work will consume extensive resource for the next 2+ years and potentially stifle capacity for product design and innovation based initiatives, unless efficient and fit for purpose solutions are considered.

Ngā Mihi

[redacted]

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Response to Consultation questions

Question	Response
Q1. Do you agree that improving access to product data will support consumer mobility through enabling innovation and informed choice?	Yes, Contact Energy fully supports improved access and transparency of product data so that consumers can easily compare electricity products across retailers and make more informed choices.
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?	Contact Energy supports the Authority's goal of improving access to electricity product data, but we emphasise that the inherent complexity and diversity of pricing structures should not be underestimated. Defining standards that accurately reflect this complexity will be challenging and will likely require multiple iterations to get right. While better access to product data has the potential to foster innovation and competition, there is a risk that poorly designed standards could inadvertently hinder innovation - particularly if they fail to accommodate emerging pricing models or novel product constructs. For example, comparing Time-of-Use (TOU) plans with free or discounted off-peak rates against non-TOU plans requires assumptions about customer behaviour and load-shifting. Similarly, the impact of discounts, credits, and other incentives adds layers of complexity that must be accounted for in any standardised format. If these nuances are not captured, consumers may struggle to make confident and well-informed decisions. We recommend: • Iterative co-design with industry and comparison platforms to ensure standards reflect real-world pricing and consumer needs. • Inclusion of behavioural modelling guidance to support comparison tools in estimating the impact of TOU plans. • Flexibility in the data standard to allow for future innovations in pricing and bundling, without requiring constant rework of the protocol.
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?	Yes, Contact Energy believes it is essential that the Electricity Authority and MBIE work in close partnership to ensure a single, consistent set of product data standards that support both consumer mobility and a future CDR framework. Misalignment between the two agencies risks duplication, confusion, and increased compliance costs for industry participants. MBIE's July 2025 electricity CDR consultation paper outlines a broad scope for designated product data - including eligibility criteria, fees, discounts, credits, and other incentives. These

	elements would need to be fully captured in the EIEP-14 specifications to ensure consumers and comparison platforms can accurately assess which plans best suit their needs. We recommend that MBIE, the EA, and industry stakeholders jointly develop these specifications through a coordinated co-design process. Ideally, future consultation papers from both agencies would be issued jointly, covering both product and customer data, to provide clarity and avoid conflicting expectations. We also suggest that the EA and MBIE establish a shared governance or working group to oversee the alignment of standards, timelines, and implementation pathways. This would help ensure that the evolving CDR framework and EIEP14 protocols remain interoperable and future-proof.
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?	Yes, full alignment between the Authority's product data standards and MBIE's CDR designation is essential to minimise duplication, reduce implementation costs, and avoid consumer confusion. If the standards are not harmonised, stakeholders may be forced to build and maintain duplicate systems to meet differing regulatory requirements. This would not only increase costs but also risk inconsistencies in the data presented to consumers, undermining trust and usability. Additionally, misalignment could delay innovation and slow down the rollout of consumer-facing tools, particularly those relying on API-based access and real-time data exchange.
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?	There are important differences between the definitions of "generally available retail tariff plan" in the Electricity Industry Participation Code and "product data" under the CPD Act that need to be reconciled to ensure consistency and usability. MBIE's July 2025 consultation paper outlines a broad scope for product data, including eligibility criteria, fees, discounts, credits, and other incentives. These elements are critical for consumers and comparison platforms to accurately assess which plans offer the best value. However, the current Code definition of generally available tariffs does not fully capture these components - particularly discounts and incentives - which can significantly affect the effective price a customer pays. For example, a customer receiving a guaranteed 10% discount is effectively paying rates that are 10% lower than those listed in the generally available tariff. Similarly, the impact of load-shifting under TOU plans with free or discounted off-peak periods cannot be understood without modelling behavioural changes, which are not reflected in the Code's definition.

	We recommend that the Authority and MBIE work together to harmonise these definitions and ensure that the EIEP-14 specifications fully reflect the scope of product data required under the CPD electricity designation. This will be essential for enabling accurate comparisons, supporting consumer choice, and ensuring regulatory coherence.
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?	Yes. The current arrangements are fragmented, slow, and inconsistent, and do not support the level of standardisation required for a modern, digitalised electricity market. A regulated and standardised approach is needed to streamline data exchange and support consumer mobility.
Q7. Have you encountered specific operational or compliance barriers when trying to access or share product data?	Yes. As noted earlier, the absence of an industry-wide product data standard that captures all relevant plan details - including discounts, incentives, and eligibility criteria - creates a significant operational barrier. Without a consistent and comprehensive format for in-market plans, it is difficult to support accurate comparisons or provide meaningful advice to customers. This lack of standardisation increases the burden on retailers and third-party providers, who must interpret and reconcile disparate data formats manually. A well-designed, regulated product data standard would significantly reduce this friction and improve both compliance and customer experience.
Q8. What are the most significant friction points for consumers when comparing and switching electricity plans today?	One of the most significant challenges for consumers is determining which TOU or non-TOU plans offer the best value for their household. This is due to the complexity of accounting for consumption patterns - both seasonal and intraday - as well as the impact of dual-fuel discounts, credits, and other incentives. Even consumers who are very familiar with the electricity industry, and have access to their own consumption data, often struggle to estimate how their usage would change under a TOU plan. For example, assessing how much electricity could realistically be shifted to a weekend period with free or discounted off-peak rates requires assumptions that are difficult to make with confidence. Without tools or standards that help model these behavioural changes, consumers are left to guess, which undermines their ability to make accurate and informed decisions. This friction contributes to switching inertia and limits the effectiveness of comparison platforms.

	We suggest that any product data standard or comparison tool be supported by behavioural modelling guidance or features that help consumers understand the likely impact of TOU plans on their bills.
Q9. How would better access to standardised and on-demand product data improve outcomes for consumers and/or your organisation?	Improved access to standardised and on-demand product data would deliver significant benefits to both consumers and retailers. For consumers, it would make it easier to identify a suitable electricity plan using independent comparison platforms. This would reduce confusion, improve confidence in switching decisions, and help unlock better value. For retailers, a consistent and comprehensive product data standard would enable retailers to benchmark their offerings more effectively against competitors, driving innovation and enhancing competitiveness. This is reliant however on the data standard being fit-for-purpose and accurate.
Q10. Do you agree with the proposed assessment criteria (effectiveness, efficiency, feasibility, and strategic alignment)? Are there other criteria we should consider?	Yes, we agree with the proposed assessment criteria. However, we note that Option 3, as currently presented, is very broad and overlaps significantly with MBIE's CDR consultation. To ensure a more accurate and practical evaluation, we recommend that the individual components of Option 3 be assessed independently against the criteria. For example, in our view, the feasibility of developing a high-quality EIEP14-A standard is significantly greater than that of EIEP14-B or EIEP14-D. EIEP14-A is more straightforward to implement and delivers immediate consumer benefits, whereas EIEP14-B presents additional complexity and EIEP14-D requires substantial investment in API infrastructure and privacy safeguards that are closely related to the CDR. The Authority may also wish to consider adding a fifth criterion: "implementation risk", to explicitly capture the likelihood of delays, cost overruns, or unintended consequences - particularly relevant for more complex components like EIEP14-D.
Q11. Do you have a view on which option (status quo, regulated EIEP14, new modular EIEPs) would deliver the most benefit and why?	We support the development of a regulated and high-quality EIEP14-A standard that captures all relevant in-market product data needed by comparison platforms to support customer decision-making. This format offers the most immediate and practical benefits, but we acknowledge that it will require a lot of detail and is likely to need multiple iterations to get right. Handling the wide-variety of TOU and distributed generation TOU plan variations will be challenging. We do not support the proposed EIEP14-B format. Capturing all possible plan variants - including bespoke discounts and legacy

	offers - would be infeasible, given the hundreds of thousands of combinations that exist across the industry. As the market continues to evolve toward individualised pricing that reflects each customer's consumption profile, the concept of a centralised "all plans" dataset becomes increasingly impractical. Instead, we recommend that customer-specific product data be delivered through the EIEP14-C format closely based on the final agreed EIEP14-A specification. This approach would allow for tailored data delivery while maintaining consistency with the broader product data standard, making it easier for consumers to access and share their plan information with comparison platforms. We also suggest that the Authority consider sequencing implementation to prioritise EIEP14-A first, followed by customer-specific formats (EIEP14-C), and defer more complex API-based solutions (EIEP14-D) until the foundational CDR standards are well established.
Q12. Do you agree with our preliminary assessment of the options presented above?	We do not fully agree with the preliminary assessment of Option 3. In our view, it does not adequately reflect the complexity, feasibility, and strategic fit of each proposed EIEP-14 component. Specifically, we do not believe that EIEP14-B represents a future-proof design. As noted previously, the inclusion of all plan variants in EIEP14-B is particularly problematic, given the scale and variability of pricing constructs across the industry. We also note that it would not provide additional insights into customer price distribution across plans that the Authority will not already be able to get from the more granular billing and tariff data provided via the retail market monitoring initiative from August 2025. The design and implementation of the full suite of EIEP14 protocols as proposed would place significant strain on retailer resources. Pricing and technical teams are already heavily committed to other EA initiatives in 2025 and 2026, such as the development of TOU and distributed generation TOU plans. Overloading these teams risks delaying innovation and undermining the broader goals of consumer mobility and market competitiveness. We strongly recommend that the EA reassess Option 3 by evaluating each EIEP14 component independently, with particular attention to feasibility, strategic alignment with CDR, and the operational impact on industry stakeholders.
Q13. Are there elements of the existing EIEP14 that could be adapted or strengthened rather than replaced?	While there are likely elements of the current EIEP14 that could inform the design of EIEP14-A, we believe a first-principles, blank-slate approach would be preferable. Starting fresh allows for a more flexible and future-proof design that can better

	accommodate the complexity of modern pricing structures and emerging product innovations. The data formats currently requested by electricity comparison platforms such as Powerswitch provide valuable context and should be considered in the design process. These platforms have practical experience in presenting plan information to consumers and can offer insights into which data fields are most useful and how they should be structured. We suggest that the Authority engage directly with comparison platforms and other third-party service providers during the design phase to ensure the new format meets real-world needs and supports consumer decision-making effectively. There may also be benefits in assessing how the formats of the Australian electricity CDR and government plan comparison sites could be adapted to meet our unique needs.
Q14. Are there any other barriers to using EIEP14 that we have not identified?	Yes. As noted earlier, one of the key challenges is accurately accounting for how consumer behaviour may change in response to TOU pricing. Estimating the extent to which a household can shift its consumption is inherently subjective and varies widely between consumers. This makes plan comparisons difficult, even for those with access to detailed consumption data. We also note that MBIE's CDR proposals include bundling information as part of designated product and customer data. While bundling is highly relevant to consumers, incorporating it into the EIEP14 format introduces additional complexity. Plans that include bundled services (e.g., broadband or gas) often have conditional pricing and incentives that are difficult to standardise and compare. We suggest the Authority consider how bundling and behavioural assumptions can be represented in a way that supports comparison tools without oversimplifying or overcomplicating the data standard.
Q15. If option 3 (new modular EIEPs) is pursued, how should we best sequence implementation to ensure deliverability and minimise disruption?	We strongly recommend that the design and implementation of EIEP14-A be prioritised as the first step. This component is the least complex, and its successful rollout would significantly improve the quality and consistency of product data available to consumers via comparison platforms. It also presents the least complexity for retailers and other stakeholders to interpret and implement. Lessons learned from EIEP14-A's development should then inform the design of customer-specific formats such as EIEP14-C. In fact, much of the tariff and product pricing data could potentially remain identical between the two formats.

	This staged approach would allow for iterative refinement, reduce implementation risk, and ensure that foundational standards are well-tested before progressing to more complex components like EIEP14-D (API-based access).
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?	We have significant concerns about the feasibility of the proposed EIEP14-B format. If mandated, it would require retailers to create a unique identifier for every combination of plan/campaign and discount currently in use - resulting in a huge dataset with thousands of rows, many of which would only apply to a handful of customers and some would only be theoretical constructs with no active customers. This would impose significant system and resource costs on retailers and create unnecessary complexity for comparison platforms. Instead, we recommend that customer-specific product data be delivered through a tailored EIEP14-C format (aligned with the CDR framework), which would contain all relevant plan and pricing information for that individual customer. This approach is more scalable, privacy-conscious, and better suited to a future where pricing is increasingly personalised.
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?	As already noted, we do not believe the proposed EIEP14-B format is practical. Mandating it would require retailers to create unique identifiers for every combination of plan/campaign and discount currently in use, resulting in significant system investment for very limited consumer benefit. Instead, we strongly recommend that customer-specific product data be delivered through the EIEP14-C format, which would contain all relevant plan and ricing information tailored to the individual customer. This data could be requested and downloaded from the retailer, and easily shared by the customer to comparison platforms. In future, access could be enabled via EIEP14-D/the CDR API framework, allowing for secure, on-demand data exchange.
Q18. What practical limitations (if any) should apply to third-party requests for tariff data?	We do not believe any practical limitations should apply to third-party requests for EIEP14-A in-market product data. This data is non-personal, publicly applicable, and essential for enabling transparent comparisons and informed consumer choice. However, access to customer-specific product data under EIEP14-C or the CDR framework is inherently more complex and must be subject to robust privacy, consent, and verification protocols. These safeguards are critical to protecting consumer data and maintaining trust in the system. Yes. We recommend the following interim measures to support a smooth transition:

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? Q.18b. What additional provisions are needed to maintain data continuity during retailer exits, mergers, or other significant business changes?	• Iterative co-design of the EIEP14-A by the Authority, MBIE, retails and other third parties so that clear specifications are agreed that will meet the needs of consumers. • Pilot programs with comparison platforms to validate the usability and completeness of the EIEP14-A data before full rollout. • Similar processes for the development of the EIEP-C and EIEP-D/CDR API. We believe this is a lower-priority issue at this stage and can be addressed once the core challenges of data standardisation and access protocols are resolved.
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 is practical, consistent and does not add unnecessary compliance costs?	We do not support the introduction of unique identifiers for every electricity plan. In a market where discounts, rates, and conditions can vary from customer to customer - even within the same plan name - the concept of a single identifier becomes impractical and potentially misleading. Much of this complexity can be avoided by focusing on two complementary standards: • EIEP14-A for in-market tariffs, which captures publicly available plan data. • EIEP14-C for customer-specific product data, which includes all relevant tariff, pricing, and consumption information tailored to the individual. Together, these formats achieve the intended goals of transparency, comparability, and consumer empowerment - without the need for a burdensome identifier system that would be difficult to maintain and interpret. Rather than enforcing unique identifiers, we suggest the Authority focus on ensuring that plan metadata (e.g., name, eligibility criteria, pricing structure) is clearly and consistently presented in both EIEP14-A and EIEP14-C formats. This will support accurate comparisons while keeping compliance costs manageable.
Q20. Do you have any feedback on how these new protocols could be implemented?	As noted, we strongly recommend prioritising the development and implementation of a high-quality EIEP14-A protocol first. This component is less complex and will deliver the fastest and most tangible benefits to consumers and comparison platforms. It also presents the lowest implementation risk for retailers and other stakeholders. Once EIEP14-A is established, its structure and learnings can inform the design of customer-specific formats such as EIEP14-C.

	In fact, much of the tariff and product pricing data could remain consistent across both formats, with only additional fields required for customer-specific information such as consumption or bundling. We suggest a phased implementation approach: 1. Phase 1 - Finalise and roll out EIEP14-A for in-market product data. 2. Phase 2 - Use insights from Phase 1 to develop EIEP14-C for customer-specific data that customer's would be able to request from retailers (e.g. through their online customer portal). 3. Phase 3 - Introduce EIEP14-D/CDR-aligned API access once the foundational standards are proven and stakeholder systems are ready. This approach will minimise disruption, reduce complexity, and ensure that each protocol builds on a stable and well-understood foundation.
Q21. What are the likely implementation costs (systems, processes, resourcing) for your organisation, and how could these be minimised?	The implementation costs could vary significantly depending on the scope and complexity of each protocol: • EIEP14-A: Costs are expected to be more modest, primarily involving resourcing to support data preparation and formatting. These are manageable and could be minimised through clear specifications and early engagement with comparison platforms. • EIEP14-C (customer-specific product data): Costs would be more substantial, as this would likely require changes to our online systems and CMS infrastructure to enable on-demand generation of customer-specific files. We estimate this could be in the hundreds of thousands of dollars. • EIEP14-D/CDR API integration: The cost of implementing the full solution is difficult to estimate due to its high-level nature, but it would likely run into the millions. This is due to the many privacy, security, and technical risks associated with building and maintaining real-time API access - something our current systems are not designed to support. • EIEP14-B: We have estimated the costs of enhancing our CMS and pricing systems to have a unique ID for every combination of plan/campaign and discount would be in the hundreds of thousands.

	To minimise costs and disruption, we recommend: • Prioritising EIEP14-A as a foundational step. • Deferring EIEP14-D development until standards are stabilised and aligned with MBIE's CDR framework. • Providing technical guidance, test environments, and shared infrastructure where possible to reduce duplication and accelerate implementation.
Q22. What support, if any, would you find helpful during implementation (eg, technical guidance, test environments)?	For the development of EIEP14-A, we anticipate minimal support requirements beyond the development and provision of clear, well-structured specifications. These specifications should include detailed field definitions, examples of valid data formats, and guidance on how to handle edge cases (e.g., seasonal pricing, bundled services). However, for the full modular solution that incorporates the EIEP14-D/CDR API we expect that extensive technical guidance and implementation support will be essential. This includes: • Sandbox environments for testing API integrations and verifying data exchange workflows. • Reference implementations or mock endpoints to help retailers and third-party providers validate their systems before going live. • Security and privacy guidance, especially around consent management, data encryption, and audit logging. • Version control and change management protocols to ensure updates to the specification are communicated and adopted consistently across the sector. We also recommend the Authority/MBIE consider establishing a technical working group or helpdesk function to support retailers during the EIEP14-D implementation. This would help ensure consistency and reduce implementation risk.
Q23. What compliance or assurance mechanisms (beyond Code compliance monitoring) would support effective data quality and adherence?	To ensure high-quality implementation and ongoing adherence to product data standards, we recommend a combination of light-touch assurance mechanisms that balance accountability with practicality: • Self-certification and attestation: Retailers could be required to submit an annual declaration confirming compliance with the EIEP14 specifications, including confirmation that data is complete, accurate, and up to date. • Automated data validation checks: The Authority could implement basic validation rules (e.g., field completeness, logical consistency, format compliance) within the data exchange system to flag anomalies early. • Periodic data quality audits: Targeted audits - either randomised or risk-based - could be used to verify the

	accuracy of product data, especially for retailers with complex pricing structures or high switching volumes. • Consumer and third-party feedback loops: Comparison platforms and accredited requestors should be encouraged to report data inconsistencies or usability issues, which could trigger review or remediation processes. • Alignment with CDR accreditation: For customer-specific data and API-based access, assurance mechanisms should align with the CDR framework, including requirements for dispute resolution, insurance, and internal controls. These mechanisms would help maintain trust in the system, support continuous improvement, and ensure that consumers receive reliable and comparable information - without imposing excessive compliance burdens on retailers.
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?	We would welcome the opportunity to be closely involved in the co-design of the EIEP14-A protocol, as this is the foundational component with the most immediate impact on consumer mobility and comparison services. We also strongly recommend that the Authority engage with key users of product data, including comparison platforms such as Powerswitch, Daylight, and other emerging services. These platforms have deep practical experience in presenting plan information to consumers and can offer valuable insights into which data fields are most useful, how they should be structured, and what features best support consumer decision-making.
Q25. Are there specific technical standards, platforms, or international practices the Authority should consider in designing API-based access?	We encourage close consultation between the Authority's Australian counterparts - particularly the Australian Energy Regulator (AER) and relevant state agencies - to understand lessons learned from initiatives such as Energy Made Easy, Victorian Energy Compare, and the broader Australian CDR framework. In particular, the granularity and structure of the Australian energy product APIs offer valuable insights. For example, the Energy Made Easy platform defines separate schemas for: • Generic plans • Generic plan details • Electricity and gas usage • Energy accounts and account details • Eligibility criteria and incentives These schemas support both consumer-facing comparison tools and accredited third-party services under the Australian CDR regime. While the AER does not appear to make raw product data

	publicly accessible, it does enable secure access via CDR APIs - an approach that may be worth emulating in New Zealand. We also recommend the Authority consider: • Adopting API standards with clear versioning and schema definitions. • Sandbox environments and mock endpoints to support early testing and integration by retailers and third-party requestors. The *Australian Consumer Data Right Compliance Guide for Data Holders – Energy Sector 2025* may also serve as a useful reference for both technical and governance considerations.
Q26. Do you have any feedback on the proposed implementation timeline, or additional risks or dependencies we should factor in?	We support a phased implementation approach that prioritises the development of a high-quality EIEP14-A specification as the first step. This component is foundational to enabling consumer mobility and comparison services, but it will require careful design and likely multiple iterations to get right. The complexity of accurately capturing tariff structures, eligibility criteria, and incentives - especially for TOU and bundled plans - should not be underestimated. We expect that lessons learned from the development of the EA-Daylight comparison platform over the coming months will help inform the critical data elements and usability requirements for EIEP14-A. Given this, we believe it is realistic to expect that the specification and implementation of EIEP14-A will extend well into 2026. Following this, we recommend that the customer-specific product data format (EIEP14-C or CDR-equivalent) be developed to closely mirror the EIEP14-A structure. This will ensure consistency and reduce duplication of effort. However, retailers will require significant lead time to build the necessary systems to generate and deliver this data securely - particularly if it is to be made available via self-service portals or mobile apps. The most complex and highest-risk stage will be the design and implementation of EIEP14-D/CDR API access. This will require: • Extensive stakeholder engagement • Robust privacy and security frameworks • Consent and identity verification mechanisms • Significant investment in API infrastructure and testing Given these challenges, we do not believe full API-based access will be feasible before 2027 at the very earliest. We note that the roll-out of the CDR in the energy sector in Australia took multiple years because of the inherent complexity. Attempting to accelerate the timeline could introduce unnecessary risk, increase costs, and compromise the quality of the consumer experience.

	We also note that the implementation timeline should remain flexible to accommodate: • Dependencies on MBIE's CDR designation process and the Authority's proposal for a customer consumption data protocol. • Retailer capacity constraints due to overlapping regulatory initiatives • The need for alignment with other EA workstreams (e.g., retail market monitoring, switching reforms) A realistic, staged rollout with clear milestones and opportunities for industry feedback will be critical to the success of this initiative.