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By email consumer.mobility@ea.govt.nz

Enabling Consumer mobility by improving access to electricity product data

We appreciate the opportunity to comment on the above consultation.

We consider the proposals outlined in the consultation essential. Although this consultation focuses on tariff information, we wish to emphasise that there are still many difficulties with the provision of consumption data using the EIEP13 process that also need to be resolved.

We have detailed responses to the consultation questions in the following pages; however, we would like to make an observation based on a quite infamous, often quoted, statement by the then CEO of Telecom in 2006.

“Think about pricing. What has every telco in the world done in the past? It’s used confusion as its chief marketing tool. And that’s fine... You could argue that that’s how all of us keep calling prices up and get those revenues, high-margin businesses, keep them going for a lot longer than would have been the case.”

CEO of Telecom New Zealand, in a speech to business analysts in Sydney, Australia, March 2006

We believe that a strong element of the “*confusion model*” is present in the retail electricity market. Therefore, the preferred option outlined in this consultation, along with necessary improvements to the consumption data process, will help alleviate some of the confusion.

We note the strong alignment with the Customer and Product Data Act 2025 (CPD) and believe that, with clear linkages between CPD and the Electricity Industry Participation Code, there will be a standardised approach for consumers and limited ability for all parties not to understand their obligations.

If you wish to discuss the content of this submission further, please contact the undersigned.

Regards,

Terry Paddy
Managing Director



Enabling Consumer mobility by improving access to electricity product data

Cortexo Limited, 7 AUG 2025

Q1. Do you agree that improving access to product data will support consumer mobility through enabling innovation and informed choice?

Yes – absolutely. Lack of standardised, accessible tariff and plan data is a primary barrier to consumer mobility. We note the infamous comment in 2006 by the then CEO of Telecom NZ;

“Think about pricing. What has every telco in the world done in the past? It’s used confusion as its chief marketing tool. And that’s fine...”

As noted in sections 2.5–2.9 of the consultation, machine-readable, near-real-time access to product data enables innovators to deliver tools that simplify choices. Consumers don’t benefit from static formats such as PDFs — they benefit from intelligent services that interpret and apply current plan information to their usage and values. Access in consistent, API-ready formats reduces friction for switching, fosters competition, and accelerates innovation, much as happened in broadband and telco markets with open APIs.

Access to product data, including both tariff and consumption information, will enable innovation, providing consumers with clear choices and outcomes. It is often remarked that customers are not engaged with electricity, and providing more information does not benefit the average consumer. This is incorrect, the more standardised information made available in a machine-to-machine, more real-time context will enable innovators to create the customer engagement applications that will make it easier for consumers to make 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?

Yes. Further benefits include:

- (a) faster innovation cycles through the removal of bilateral negotiation bottlenecks;
- (b) reduced compliance costs for retailers via a single standard;
- (c) enabling the Authority’s own market monitoring of loyalty penalties and price dispersion;
- (d) facilitating integration with EV optimisation, home energy automation, and AI-driven demand response services.

The Authority should also include a requirement for data currency — ensuring updates are made immediately upon plan changes, not just periodically.

Collecting consumption data has shown us some issues that must be addressed in any new data exchange formats. There must be no loopholes in the definition of who must comply with the CDP or Code provisions, as there currently are with brokers when attempting to access data. There must be mechanisms that ensure the data being transferred conforms to the standard; approximately 20% of the consumption data Cortexo receives fails basic conformance with the mandatory formats. The future use of APIs will help resolve many data quality issues.

Cortexo also believes that Electricity Distribution Businesses should use a similar EIEP14A format for network tariffs, which will add to transparency and provide validation of retail tariff information. This should be straightforward, as EDBs have clear, uniquely identified tariff information that is currently published in PDF form. This should be digitalised.

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. CDR alignment avoids duplication, conflicting standards, and costly re-engineering. Alignment ensures:

- (a) a single accreditation/consent framework for both consumer and product data;
- (b) re-use of API schemas across sectors;
- (c) consumer trust through uniform privacy and handling rules

The Government has made clear its intention to designate electricity under the CDR. Any work the Authority undertakes regarding consumer-related data should be done with the CDR in mind. No matter whether electricity is designated sooner or later, it would be incredibly inefficient not to align with the CDR from the outset. However, we should not hold up data transparency reform while waiting for electricity to be designated.

The CDR is a robust legal framework that clearly outlines the responsibilities of data holders and data requesters, including protocol and testing standards. Importantly, it has a penalty regime that will incentivise the required behaviour by all participants.

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?

The Authority should consider broad coverage for product data, extending beyond retail consumption and tariff products. It should also include network connection information such as connection limits (fuse size) and future dynamic operating envelope data where the EDB can limit or extend energy export and import at the connection point. This information will be particularly relevant for consumers considering the installation of distributed energy resources.

In a broader context, the introduction of accredited requestors under the CDR can align with a wider digital identity framework being implemented (I believe) by MBIE that would standardise those who can access wider data sets on behalf of consumers, offering greater innovation in a range of services such as health, finance, telecommunications, insurance and electricity.

Opportunities: scalability (once APIs for product data are CDR-compliant, adding consumption data is straightforward); cross-sector innovation (multi-utility comparisons).
Risks: delays in CDR progress — sector should still implement interim CDR-compatible standards; premature over-specification could limit adaptability to future tariff models

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?

Broadly compatible but “generally available retail tariff plan” in the Code is narrower — excluding tailored/legacy offers that still affect consumer outcomes. CPD Act “product data” is broader and should remain so. Alignment will ensure that all relevant offers are covered when the sector adopts CDR.

If tariff information is “Product data”, then “generally available retail tariff plan” is a subset of that tariff product data. “Special” tariffs and “historic” tariff plans, as discussed later in this consultation, are also “Product data”. Nothing in the Code should limit mandatory disclosure of tariff data to generally available retail tariff plans.

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, Clause 11.32G, non-regulated EIEP14, and bilateral agreements suit a manual environment, not a digital, consumer-led market. Formats are fragmented, responses slow, and cost recovery provisions deter use — preventing real-time switching insights.

The current data access arrangements enable “*competing through confusion*” as discussed in Q1. Cortexo’s experience in requesting tariff information has resulted in the inability to efficiently process any relevant information.

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

Cortexo has encountered operational and compliance barriers when trying to access both consumption and tariff information. We have documented these with the Authority at various times. When accessing tariff information in EIEP14 format (non-compulsory), of 12 requests, we received 2 EIEP14 files via the Registry messaging hub; two retailers required payment, with one quoted amount so high that it is clear that there was no interest in providing data in that format at any point. Of the rest that replied, there was a mixture of spreadsheet- and PDF-formatted documents with varying data layouts.

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

The process has exceptionally high barriers. Manual entry of plan details; confusing/duplicate plan names; inability to compare bundled offers; lack of timely updates on new offers are examples.

Anecdotally, consumers have advised the near impossibility of identifying the underlying tariff cost structures that enable comparison of “like with like”. Even the most enthusiastic consumer struggles with the complexity of the tariff, understanding bundled products (that mask the actual cost) or free offers. Switching sites that don’t have the specific tariff information or access to consumption data requires consumers to enter bill information. Consumers are either unaware or unable to download consumption data from retailer websites, which prevents them from performing a seasonal calculation of costs. There is no easy way for a customer to make informed decisions. The “*confusion model*” performs well.

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

Dynamic, personalised switching requests in near real-time; increased competitive pressure; better outcomes for disengaged/vulnerable consumers through automated switching services; improved equity and affordability.

We currently have customers and projects underway that are affected by the lack of standardised on-demand data, particularly regarding specific ICP tariffs. The lack of this automated and updatable data is costing one customer substantially in its ability to make decisions across a portfolio of locations.

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

Yes. Consideration should be given to the wider digitalisation of the electricity sector so assessment criteria should include “future proof”. Any decisions made now should align with future goals.

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

Yes, we support the modular approach. It has the highest long-term consumer and market benefit; it’s future-proof; CDR-aligned; enables consumer-specific and general plan data; unlocks real-time switching.

We have an immediate need for the proposed EIEP14A, C & D. We have practical use-cases for that service. The other two options (status quo, regulated EIEP14) will not deliver the level of value that the modular EIEPs will.

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

Yes. Option 3 strongly outperforms in effectiveness and strategic alignment. Enduring benefits outweigh upfront costs.

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

Yes. The structure for core data fields could be retained, but it needs an overhaul for dynamic/tiered tariffs and API compatibility.

The consultation anticipates that changes can be implemented reasonably quickly, with code changes expected early next year and the implementation of the modular EIEP14 solution within 6 months. To achieve this velocity, the first step should be the implementation of the EIEP14 formats using the current “methodology” of transferring CSV files via FTP, where requests are made through the Registry messaging system (see Q15). This would require a review of the existing EIEP14 to update it to become the new EIEP14A. We believe this would require minimal enhancement to ensure it is fit for purpose.

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

There should be a clear roadmap for implementing the new modular EIEP14 series, starting with enhancing the current EIEP14 to become the new EIEP14A, and then designing and implementing the EIEP14D (based on the EIEP13C, where individual ICP tariffs are required) to enable an approved third-party request.

Note that the current EIEP exchange methods are not ‘APIs’. CSV via FTP is File Transfer, Not Programmatic Interaction: Exchanging CSV files over FTP involves one system saving a file and another retrieving it. While this is a way for systems to share data, it lacks the structured interface, defined endpoints, and synchronous or asynchronous request/response pattern that characterise APIs. For example, there is no inherent security or data validation method and no method to receive updated information.

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

We have use-cases and consumers wanting both EIEP14A & C data now. These two products will provide the most value to consumers, their agents and innovators now . We would suggest the following process to deliver early wins;

1. Enhance the existing EIEP14 into the EIEP14A based on the existing CSV format. At the same time, design the JSON payload for that format.
2. Create the EIEP14C and EIEP14D in a CSV format similar to all current EIEPs. At the same time, design the JSON payload for those formats
3. Implement EIEP14A, C & D using the current CSV/FTP Registry messaging system
4. Design the more complex EIEP14B as a JSON payload only

5. Design the RESTful APIs (using OpenAPI/Swagger), including methods to subscribe to updated plans
6. Implement/Switch to the API formatted data

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?

Currently, there is a two-year limit on historic consumption data. To be useful going forward, tariff information needs to cover existing consumption data requests; therefore, legacy data back to a specific point (e.g., 2 years) would be beneficial. A flag would need to be introduced to indicate whether a tariff is current or legacy.

**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?)**

All current plans should be available. If they are legacy plans, they may have no customers, but they still need to be visible if the tariff is applied to historic consumption data. If a current available plan has no customers, it still needs to be visible so that new customers who meet the criteria can access it.

We would be concerned if any 'opt out of transparency' rule applied, meaning available tariffs could be hidden. For example, innovative services that require knowledge of the current tariff should still be available to customers who get an internal staff discount. During the planning phase of this project, consideration should be given to masking/withholding a 'special' tariff rate from "generally available tariff plans", but the plan, with its acceptance criteria (i.e. staff only), should still be visible. In the EIEP14C, all data should be available.

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?

Limitations should be restricted as much as possible so as not to encourage plans being classified as "not publishable", whether for expediency or obfuscation reasons.

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

Requests must require valid authorisation/accreditation where personal data is involved; volume limits may be needed to prevent misuse while ensuring legitimate innovation. A future automated state may allow for only responding with plan changes/additions/updates since the last request.

Standard API throttling should be implemented to combat automated, continuous requests or potentially prevent denial-of-service (DoS) attacks.
See question 20 for an implementation option.

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?

To ensure timely progress on the availability of tariff information from currently available plans and ICP or customer-specific plans, we consider it desirable to create a roadmap with interim methods to access product data as we proceed to full API on-demand access.

Cortexo suggests utilising the current EIEP CSV/FTP mechanism while developing the API on-demand process in parallel. Such a process could be

1. Enhance the current EIEP14 into the new EIEP14A, and in parallel, design the JSON payload message that meets the EIEP14A requirements for the future API on-demand service.
2. Design the new EIEP14D request format initially based on the EIEP13C consumption data request format. in parallel, design the JSON payload message that meets the EIEP14D requirements for the future API on-demand service for requesting generally available tariff information as well as customer/ICP specific information.
3. Design the new EIEP14C request format, which will be a specific use-case of the new EIEP14A format (a particular customer/ICP). in parallel, design the JSON payload message that meets the EIEP14C requirements for the future API on-demand service.
4. As a lower priority design the JSON payload message that meets the EIEP14B requirements for the future API on-demand service
5. Build and test the API on-demand service
6. Implement the on-demand service, replacing the CSV/FTP service. This could be done in a staged way with bigger retailers committing earlier.

See question 20 for an implementation option.

Q.18b) What additional provisions are needed to maintain data continuity during retailer exits, mergers, or other significant business changes?

A process would be needed to cover exits, merges, etc. This is a critical use case for the need for unique tariff identifiers. The basic concept would be that a customer who transitions to a new retailer should get a plan with that new retailer's unique tariff identifier. The new retailer could store the previous retailer's tariff plan, identified by the earlier retailer's unique identifier, as a legacy plan within the new retailer's tariff list.

See question 20 for an implementation option.

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?

Yes, there must be a unique plan identifier for each and every plan to eliminate confusion and enable automated matching. Plans can have the same or similar human-readable titles, but they must have a separate, unique identifier. Unique identifiers should be designed for minimal compliance cost and retailer integration ease.

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?

A possibility is for each retailer to manage its own plan identification. Something along the lines of

<participant_code> <unique_identifier> and separately <plain_english_plan_name>

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

Yes, we have some ideas we would like the opportunity to discuss in more detail.

Although retailers should be able to implement the requirements as they see fit, as long as they conform to the specification, an option should be the provision of a cloud-based tariff server, separate from the current registry. The tariff server would act as a 'gateway'

between individual retailer systems and data requestors. This would ensure security, data integrity and conformance.

The tariff server would connect to interested retailers via the necessary APIs to obtain the required information from their billing/CRM platforms. The retailer would be responsible for providing the raw data to the tariff server. For smaller retailers, this may be as simple as uploading a spreadsheet of information, provided it covers all the required data.

The tariff server would be responsible for maintaining all the tariff information, responding to API requests and providing the tariff data in the required RESTful JSON format. Retailers would have a process to continually update tariff information, including marking tariffs as legacy.

The tariff server would manage access security using digital keys for accredited requestors. The server would also manage access rates or limitations (see Q18). The tariff server would notify registered parties when tariff plans were updated/changed/made legacy. This approach would also easily handle retailer merges, failures, etc, as the tariff plans would remain in the tariff server marked 'legacy' (see Q18b).

This approach effectively ring-fences a number of disparate tariff systems, providing an access gateway that ensures access security and data standardisation. This is similar to what the industry has previously discussed regarding the direct access to consumption data from various MEP systems, where the retailer effectively only validates the 'requestor' and the time period during which the retailer provided services to the customer.

While the above project was implemented, we consider that the existing CSV/FTP mechanism is leveraged (see Q 18a).

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

The cost will be material, but can be minimised via open-source schemas, and shared testing and operating environments (See Q20). Costs could be mitigated by the industry working together to develop a whole industry solution. Smaller retailers could be financially assisted by the Authority or the broader industry so that they are not left out. Note that it's essential that if tariff information is to be made visible, it should include all relevant tariff information so exclusions or limitations because of cost or complexity should be strongly resisted..

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

Implementation would require a test environment acting as a retailer for third parties to test against and as a third-party retailer for other retailers to test against. There should be an industry working group to provide technical feedback and guidance. A web-based project area should be available to manage documentation/specifications/, minutes of relevant meetings, and other project-related materials, and there should be a dedicated and available project manager. The Authority should examine the EECA/EEA-run FlexTalk projects for an operating method that can be applied across multiple stakeholders.

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

From a technical perspective, an automated testing process could be run regularly (annually?) when required to ensure all processes work as planned. This is anticipated in the Customer and Product Data Act 2025 (s29. *Chief executive may require data holder to test electronic system*).

Consideration would need to be given to a method to guarantee 'coverage', i.e. are all available tariff plans actually available?

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?

Cortexo would like to be involved in the design and implementation of the modular EIEP14 approach if it proceeds. We have extensive experience with consumer EIEP processing and RESTful OpenAPI processes.

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

Where possible, utilise other international work such as UK Open Energy, Australia's CDR Energy APIs, and the USA's Greenbutton Alliance.. Adopt/adapt proven schemas to accelerate delivery.

Initial design discussions should establish a roadmap to implement the suite of EIEP14 data exchange formats, initially leveraging the current CSV/FTP system and then transitioning to

implementing RESTful APIs. API design, visibility and maintenance should utilise modern online tools like OpenAPI/Swagger; security should be implemented with OAUTH.

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

The timeline is ambitious, but if implemented in stages, we can envision how the industry can deliver value to consumers within the given timeframe.

Like all significant changes, there will be risks ranging from reluctance, capability, timelines (resourcing) and many others, but if the industry is willing to see this as a step on the way to wider digitalisation and innovation, then all risks can be mitigated.

If, however, there is reluctance to expend resources in time and capital, the Authority must weigh the benefits to consumers and overall industry productivity that this project will bring.