Electricity Engineers' Association

Level 5, 40 Mercer Street
PO Box 5324
Wellington, New Zealand
Telephone: (04) 473 8600
Web: www.eea.co.nz

To: The Electricity Authority
consumer.mobility@ea.govt.nz

From: Electricity Engineers' Association of NZ

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Subject: EEA Submission – Consultation Paper – *Enabling consumer mobility by improving access to electricity product data*

OVERVIEW

The Electricity Engineers' Association (EEA) welcomes the opportunity to comment on the Electricity Authority's consultation paper *Enabling consumer mobility by improving access to electricity product data*. This submission reflects feedback from our members across the electricity engineering community, including distribution and transmission businesses, technology providers, and industry consultants.

We support the Authority's objective to improve consumer mobility and market competitiveness through better access to standardised, accurate, and timely product data. Reliable and consistent product information is fundamental to enabling innovation, facilitating accurate plan comparisons, supporting automated switching and energy management tools, and empowering consumers to make informed choices. In contrast to the relatively consistent and accessible publication of line charges by EDBs, retailer product data is often difficult to obtain without initiating a sign-up process, is presented inconsistently, and may not clearly state whether prices include GST. A standardised, machine-readable format, similar in simplicity to line charge schedules, would significantly improve comparability and transparency for consumers.

Our current understanding from discussions with the wider industry is that existing data access arrangements, including the voluntary EIEP14, bilateral agreements, and clause 11.32G processes, are becoming increasingly unfit for purpose as the electricity system becomes more digitalised and dynamic. While these mechanisms have supported data exchange to date, they are not well suited to support emerging needs for standardisation, broad and consistent data coverage, near real-time access, and streamlined integration. As a result, they are starting to impose growing costs and inefficiencies on participants.

We agree with the Authority's preliminary assessment that the preferred option — introducing a new modular EIEP14A–D framework — offers the greatest benefits as the electricity market becomes more digitalised, dynamic, and data-driven. This approach recognises that while current arrangements (such

as EIEP14, bilateral agreements, and clause 11.32G processes) have served the sector to date, they are becoming increasingly unfit for purpose in supporting timely, standardised, and scalable access to product data. The proposed EIEP14A–D framework will:

- Provide full coverage of all plan types, including legacy and complex offers.
- Enable secure, automated, on-demand access to product data through APIs.
- Align with potential future Consumer Data Right (CDR) requirements to ensure consistency in consent, security, and interoperability.
- Support scalable innovation and continuous improvement in consumer-facing services.

Key Considerations

To ensure the protocols deliver their intended outcomes, the Authority should consider the following:

- Scope and completeness – Ensure mandatory inclusion of all plans with active customers or recently active (e.g., last 12 months), including legacy and bundled offers, while allowing practical exclusions for plans with no active customers or highly specialised, closed-group offers. Mandatory data fields should at minimum capture the core elements consumers need to compare offers: daily supply charges, anytime energy rates, controlled energy rates, time-of-use rates such as night and off-peak, and any conditional or promotional offers such as EV tariffs or free hours. All prices should be consistently stated as GST-inclusive.
- Standardisation and data quality – Establish common data definitions, mandatory fields, and clear rules for completeness, accuracy, and timeliness. Support these with automated validation tools, regular auditing, and transparent performance reporting.
- Technical design – Use established international API standards (REST/JSON, OpenAPI, OAuth 2.0), security frameworks (OWASP, ISO/IEC 27001), and best practices for version control, change management, and service-level performance.
- Implementation approach – Phase delivery to minimise disruption, starting with generally available plans (EIEP14A) and core API request format (EIEP14D), before expanding to all plans (EIEP14B) and current customer plan data (EIEP14C). Provide early publication of technical specifications, sandbox environments, and conformance testing to support readiness.
- Support for participants – Provide clear guidance, reference implementations, training resources, and targeted assistance for smaller participants to promote equitable, sector-wide compliance.
- Consumer outcomes – Ensure protocols are designed to promote equity and accessibility, so that all consumers, including vulnerable and hard-to-reach groups, benefit. Enable innovation that supports greater choice, transparency, and fairer pricing.

The proposed modular EIEP14A–D framework, if implemented with robust technical standards, a comprehensive scope, and a carefully managed transition, will address growing limitations in current data access arrangements. It will materially improve consumer mobility, enable innovation, and enhance market efficiency and transparency as we move toward a more digital and decentralised electricity system. The EEA is willing to work with the Authority and the wider industry to support the development and implementation of the new protocols, drawing on our technical expertise and industry networks.

Response to Specific Consultation Questions

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

Yes. Improving access to standardised, accurate, and timely product data will materially enhance consumer mobility by enabling innovation, supporting accurate and transparent plan comparisons, and reducing the effort and complexity for consumers to make informed choices. Reliable and consistent product data is essential for advisory services, automated tools, and emerging switching platforms, which together drive competition, improve service offerings, and deliver better outcomes for consumers.

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?

The Authority should consider setting clear data quality standards (accuracy, completeness, and timeliness) with monitoring and audit provisions, ensuring product data includes channel-specific offers, bundled services, and campaign-based pricing. Benefits not fully articulated include enabling automated plan change notifications, facilitating real-time switching, and reducing barriers for innovative third-party services, particularly those targeting vulnerable or hard-to-reach consumers.

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. Aligning product data exchange standards with a potential future electricity CDR will ensure consistency in data definitions, consent processes, and security requirements, reducing duplication and integration costs for participants. It will also enable a single, trusted framework for both product and consumption data, supporting scalability, interoperability, and faster delivery of consumer benefits.

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?

Opportunities include establishing a unified trust and accreditation framework that allows retailers, distributors, and accredited third parties to operate under the same security, privacy, and consent processes. This would enable seamless integration of product and consumption data, reduce duplication of systems, and support faster development of innovative consumer services such as automated switching, personalised energy management tools, and bundled energy offers.

Risks include misaligned timelines between the Authority's programme and the Government's CDR implementation, which could lead to rework or incompatible standards. There is also the potential for increased compliance complexity, particularly for smaller participants with limited technical capability. These risks can be mitigated through coordinated planning with MBIE, joint milestones for standards development, clear transitional arrangements, and provision of reference implementations, conformance test tools, and technical guidance to support all market participants.

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?

The definitions are related but not identical. The Code's "generally available retail tariff plan" focuses on plans actively offered to the public, whereas "product data" under the CPD Act is broader, potentially including additional plan attributes, eligibility criteria, and plan types (such as legacy or complex offers) that may not be currently marketed but are still held by consumers. While the two can be reconciled through careful mapping, alignment is essential to ensure consistency in scope, terminology, and data fields. This alignment should explicitly address how legacy, complex, or bundled plans are treated, so consumers and accredited third parties can access complete, accurate, and comparable information across both frameworks.

Q6: Do you agree that the current data access arrangements (eg, clause 11.32G, nonregulated 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. Current arrangements, including clause 11.32G, the non-regulated EIEP14, and bilateral agreements, are no longer fit for purpose in a digitalised electricity industry. They lack mandatory standards, rely on manual or inconsistent processes, and have response timeframes (often several days) that are incompatible with on-demand data exchange. This leads to inconsistent coverage, variable data quality, and additional reformatting costs for participants, creating barriers to innovation and limiting

the development of consumer-facing tools and services. To enable a modern, competitive market, access arrangements need to be standardised, automated, and supported by clear performance expectations.

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

Yes. Barriers include:

- Inconsistent data formats and definitions across retailers, requiring significant reformatting and reconciliation before data can be used.
- Lengthy manual request and approval processes, often reliant on email or ad hoc file transfers, which delay access and increase administrative effort.
- Variable response times, with some requests taking several days, making it difficult to support on-demand services.
- Incomplete coverage of legacy or complex plans, meaning consumers and advisers may be unable to compare their current plan against market offerings.
- Lack of clear data quality standards, leading to gaps, outdated information, or inconsistent treatment of plan attributes.

These barriers can be addressed through adoption of standardised data definitions and exchange formats, automated and secure request/response mechanisms (e.g., APIs), mandated service levels for response times, comprehensive inclusion rules for plan data, and data quality monitoring with compliance oversight.

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

Significant friction points include:

- Difficulty identifying the details of their current plan, particularly where plan names, terms, or pricing structures are unclear or have changed over time.
- Inconsistent presentation of plan features and pricing across providers, making it hard to compare like-for-like offers. Unlike the clear and simple tables used for EDB line charges, consumers often cannot access a basic, consistent table of rates from retailers without entering personal information or starting a sign-up process. This creates unnecessary barriers to informed decision-making.

- Limited visibility of legacy or complex offers, meaning consumers may not realise they could switch to a more suitable plan.
- Unclear or conditional discounts and fees, which can make advertised prices misleading or difficult to calculate accurately.

Mitigations include standardising the format and content of product data across all providers, ensuring current plan details are easily accessible to consumers and accredited third parties, mandating inclusion of legacy and complex plans in product datasets, and requiring transparent disclosure of all fees, discounts, and conditions in a consistent, machine-readable format to enable accurate and fair comparisons.

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

Better access to standardised, on-demand product data would allow consumers to receive timely, accurate, and comparable plan information, making it easier to identify suitable offers and switch with confidence. This would reduce search effort, minimise the risk of misinformation, and improve trust in the market. For the EEA and its members, it would support the development of innovative advisory tools, automated switching services, and personalised energy management solutions. It would also lower the cost and complexity of integrating with multiple retailers, improve data quality and consistency across the sector, and create a more competitive environment that drives better value, service, and choice for consumers. Frequent or uncoordinated changes to product data structures or protocols could undermine the stability required for third-party services to invest in consumer comparison tools. A clear change management process and adequate advance notice periods are essential.

For example, a consumer using an accredited comparison service could instantly retrieve their current plan details and match them against all generally available and legacy plans in the market. The tool could factor in their actual usage profile, discounts, and fees to present the most cost-effective options, allowing the consumer to switch online in minutes rather than days.

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

Yes. The proposed assessment criteria of effectiveness, efficiency, feasibility, and strategic alignment are appropriate for evaluating options. However, the Authority should also consider adding:

- Equity and accessibility – ensuring that solutions deliver benefits to all consumer groups, including vulnerable, low-income, and hard-to-reach customers. This includes making data available in accessible formats, supporting multiple channels (digital and non-digital), and avoiding designs that inadvertently create barriers for smaller participants or less digitally engaged consumers.
- Data quality and security - ensuring that data provided is accurate, complete, up-to-date, and transferred securely in line with privacy and cyber security best practice. High data quality underpins consumer trust and the effectiveness of comparison and switching services, while strong security safeguards protect both consumers and market participants from misuse or breaches.

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

The EEA supports the new modular EIEP14A–D option as it will deliver the most benefit. This approach provides comprehensive coverage of all plan types, enables secure, standardised, and on-demand data exchange, and aligns with future Consumer Data Right frameworks. It addresses current gaps in timeliness, consistency, and scope, supporting innovation, improving comparability, and enhancing consumer mobility in a way that the status quo or a regulated version of the existing EIEP14 cannot achieve.

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

Yes. We agree with the Authority's preliminary assessment that the new modular EIEP14A–D option provides the greatest overall benefits. Our views on the options are:

- Status quo – Not fit for purpose. The voluntary nature, inconsistent formats, and slow response times cannot support on-demand, standardised data exchange or the innovation needed for a modern, competitive market.
- Mandating current EIEP14 – An improvement on the status quo, but still limited in scope, excluding legacy and complex plans and lacking the API capability needed for automated, real-

time access. It would address some consistency issues but not fully enable innovation or consumer mobility.

- New modular EIEP14A–D – The preferred approach. It captures all plan types, enables secure and standardised on-demand access, aligns with potential future CDR frameworks, and provides the flexibility to evolve over time. This option directly addresses current gaps in coverage, timeliness, and comparability, delivering the best long-term outcomes for consumers and market participants.

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

Yes. Elements of the existing EIEP14, such as its core data fields, basic structure, and widespread industry familiarity, could be retained as a foundation for the new modular formats. These could be strengthened by:

- Expanding scope to cover all plan types, including legacy, complex, and bundled offers.
- Enhancing data definitions and field requirements to ensure consistency, clarity, and interoperability across all participants.
- Introducing API capability to enable automated, on-demand data exchange rather than relying solely on file transfers.
- Mandating performance requirements such as response time SLAs and data freshness standards.
- Adding robust data quality controls with monitoring, reporting, and compliance oversight to ensure accuracy, completeness, and timeliness.

This approach would preserve existing familiarity while addressing the gaps that currently limit EIEP14's effectiveness in supporting a digitalised, consumer-focused electricity market.

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

Yes. Additional barriers include the absence of mandatory inclusion for legacy and complex plans, which limits the ability to compare a consumer's current plan with the full range of market offers. There is also limited metadata to capture promotional, bundled, or channel-specific offers, meaning some plans cannot be accurately represented in comparison tools. In addition, EIEP14 lacks a standardised process for notifying participants when plan details change, reducing timeliness and increasing the risk of

outdated information being used in consumer decisions. These gaps limit the completeness, comparability, and reliability of the data for consumers, advisers, and third-party services.

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

Implementation should be staged to manage complexity and minimise disruption. We recommend starting with EIEP14A (generally available plans) and EIEP14D (electronic request format) to establish core standards and API capability, such as common data definitions, mandatory field requirements, security and authentication protocols, and standardised response formats. Once stable, expand to EIEP14B (all plans, including legacy and complex) and finally EIEP14C (current plan data with accredited consent). Each phase should include clear specifications, sandbox testing, conformance checks, and defined service levels, with targeted support for smaller participants to ensure readiness across the sector.

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?

Yes. EIEP14B should capture all current and legacy plans that have active customers or have been active within a defined recent period (e.g., the last 12 months). Including these plans is essential because many consumers remain on older or complex offers that are no longer actively marketed. Without this information, they cannot make accurate like-for-like comparisons, and advisers or switching tools may present incomplete or misleading options. Capturing historic offers ensures transparency, supports informed decision-making, and helps reduce inertia by enabling consumers to see the potential benefits of moving to a more suitable plan.

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?)

Yes. To ensure practicality, the Authority could consider excluding plans with no active customers and those that are highly specialised, such as internal staff discounts or one-off community sponsorship arrangements, as these have no relevance to the wider market. However, inclusion should be required for any plan that:

- Has active customers (e.g., legacy fixed-term offers, historic promotional plans, or complex time-of-use tariffs still in use).
- Has been active within a defined recent period (e.g., the last 12 months) and could still be held by consumers.
- Is part of a broader product bundle (e.g., electricity plus broadband or EV charging) that is available to the general public.

Clear and consistent inclusion/exclusion criteria will help balance data completeness with operational practicality while ensuring consumers can make accurate and informed comparisons.

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 defined using clear, objective criteria to maintain both comprehensiveness and relevance. We recommend including any plan with active customers or that has been active within the last 12 months and excluding plans with no active customers or that are restricted to a closed group (e.g., staff-only offers). Definitions should be standardised across the industry to ensure consistent application, supported by guidance and examples to aid interpretation by all participants.

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

Practical limitations should focus on maintaining system performance, ensuring data security, and providing fair access for all accredited participants. This could include measures such as rate limiting and pagination for high-volume requests, accreditation and explicit consent requirements where customer-specific data is involved, and reasonable use provisions to prevent excessive or disruptive querying. Limitations should be clearly documented, proportionate to the potential impact, and applied consistently to avoid disadvantaging smaller or innovative service providers. The aim should be to protect system integrity and consumer privacy while still enabling broad access to data that supports competition and innovation.

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?

Yes. Interim measures could include retaining the current EIEP14 alongside the new protocols during a transition period, providing sandbox environments and test datasets for participants to develop and validate systems, and phasing in mandatory requirements starting with generally available plans before expanding to legacy and customer-specific data. Clear implementation guidance, training resources, and targeted support for smaller participants would also help ensure a smooth transition to on-demand access.

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

The protocol should require retailers to maintain product data availability for a defined period during and after exits, mergers, or significant business changes, with obligations to transfer relevant data to the successor entity or an independent repository. This should include historic and legacy plan information to preserve comparability, supported by clear handover processes, minimum data retention periods, and compliance monitoring to ensure continuity for consumers and third-party service providers.

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. Each electricity plan should have a persistent, unique identifier to distinguish between plans with the same or similar names. This would prevent confusion where retailers use similar branding for different plan variants, ensure accurate matching of data across systems, and enable consumers and third parties to reliably track changes to plan terms, pricing, or eligibility over time. A unique identifier would also support the integration of product data with other datasets, reduce errors in comparison tools, and improve the overall transparency and usability of market information.

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?

The unique identifier system should be centrally administered by an independent body, using a standardised format applied consistently across all retailers. Identifiers should be generated once and remain persistent for the life of the plan, with versioning to record material changes. The process should be automated where possible, integrate with existing data submission workflows, and be supported by clear guidance to minimise administrative effort and compliance costs.

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

Implementation should be phased to manage complexity and ensure sector readiness. We recommend starting with generally available plans (EIEP14A) and the core API request format (EIEP14D) to establish consistent data definitions, security protocols, and response formats, before expanding to all plans including legacy and complex offers (EIEP14B), and finally to customer-specific current plan data (EIEP14C) with accredited consent processes.

The Authority should publish clear technical specifications, data dictionaries, and security requirements early, accompanied by sandbox environments and conformance testing to allow participants to build and validate systems in advance. Governance arrangements should include change control processes, version management, and regular industry engagement to ensure protocols remain fit for purpose.

Targeted support, such as reference implementations, training resources, and funding assistance for smaller participants, will be critical to achieving consistent compliance, minimising disruption, and ensuring all consumers can benefit from the new protocols.

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

For the EEA, direct implementation costs would be limited, but our members are likely to face costs for system upgrades, API development, process changes, data quality improvements, and staff training. These costs can be minimised through early release of technical specifications, use of common data standards, provision of reference implementations and test environments, alignment with other regulatory data initiatives (such as CDR), and phased implementation to spread investment over time.

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

Helpful support would include comprehensive technical guidance, detailed data dictionaries, and clear examples of how each data field should be populated to ensure consistency across participants. Sandbox and test environments should be made available well in advance of go-live, along with conformance testing tools that allow participants to validate outputs against the protocol requirements. Reference implementations and sample API code would reduce development effort and support alignment across the industry.

Regular industry forums, webinars, and Q&A sessions during the rollout period would help address common issues, while a dedicated helpdesk could provide timely resolution of technical or procedural queries. Targeted assistance, such as training workshops or funding support, for smaller participants would help ensure they can meet requirements on the same timeline, maintaining a consistent level of capability and compliance across the sector.

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

Effective mechanisms could include regular independent audits of data quality to verify accuracy, completeness, and timeliness, supplemented by periodic conformance testing against standardised datasets to ensure adherence to agreed definitions and formats. Automated validation checks at the point of data submission would help identify and correct errors before data is made available to consumers or third parties.

Mandatory reporting on key data quality metrics, such as error rates, data freshness, and response times, would enable ongoing monitoring, while transparent publication of aggregated compliance performance could incentivise improvement and build trust in the system. Peer review processes, where participants periodically test and validate each other's outputs, could also strengthen consistency. Together, these measures would create a robust assurance framework that supports continuous improvement and high-quality outcomes for consumers.

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?

The EEA would like to be actively involved in co-design through participation in technical working groups, reviewing draft specifications, and facilitating engagement with our members to gather sector feedback. The Authority should also consult widely with retailers, distributors, consumer advocacy groups, accredited comparison and switching service providers, technology vendors, and MBIE to ensure the protocols are practical, future-proof, and aligned with broader regulatory and consumer data initiatives.

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

Yes. In designing API-based access, the Authority should draw on established technical standards and proven international practices to ensure interoperability, scalability, and security. Relevant considerations include:

- Standards and protocols – Adopt widely used web API design principles such as RESTful architecture with JSON payloads, OpenAPI/Swagger specifications for documentation, and OAuth 2.0 / OpenID Connect for authentication and authorisation.
- Security frameworks – Align with OWASP API Security Top 10 and relevant ISO standards (e.g., ISO/IEC 27001 for information security management) to ensure robust protection of consumer and product data.
- Data models – Develop a canonical data model with clearly defined fields, enumerations, and units, informed by existing EIEP definitions and extended to meet new requirements.
- International precedents – Leverage learnings from Australia's Consumer Data Right energy APIs, the UK's Open Banking Implementation Entity (OBIE) standards, and the Green Button initiative in North America, particularly in areas of consent management, accreditation, and change control.
- Version control and change management – Implement semantic versioning, with clear deprecation policies, public changelogs, and backward compatibility for minor updates to minimise disruption.
- Performance and reliability – Define minimum service levels for uptime, latency, and throughput, supported by monitoring and reporting to ensure consistency across providers.

Using established standards and referencing proven international approaches will reduce integration costs, support innovation, and help ensure the protocols remain compatible with future Consumer Data Right requirements.

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

The proposed timeline is ambitious and should allow sufficient time for technical design, industry consultation, and staged implementation. Key risks include misalignment with the Consumer Data Right programme, readiness gaps among smaller participants, and delays in finalising technical specifications. These can be mitigated through early release of standards, phased implementation with sandbox testing, and targeted support to ensure all participants can meet requirements on schedule.

Contact

The EEA's contact person for this submission is Dr Stuart Johnston, Lead Advisor Engineering & Technical [redacted]