

12 August 2025

Submissions
Electricity Authority
Level 7, AON Centre
1 Willis Street
Wellington 6011

Via email: consumer.mobility@ea.govt.nz

ERGANZ SUBMISSION ON ELECTRICITY PRODUCT DATA

The Electricity Retailers' and Generators' Association of New Zealand ('ERGANZ') welcomes the opportunity to provide feedback on the Electricity Authority's consultation paper, 'Enabling consumer mobility by improving access to electricity product data' from late July 2025.

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

Overview

ERGANZ supports the Authority's work to enhance consumer mobility in the electricity market. We believe that consumers should be able to easily understand their electricity options, compare offers with confidence, and switch to the plan or retailer that best meets their needs. An open, transparent, and competitive market benefits consumers by driving innovation in plan design and improving service quality.

For the Authority, that means reducing complexity, removing unnecessary friction from switching, and supporting trusted third parties to help consumers make informed decisions. Our members see data as a critical enabler of these outcomes. When accurate, standardised product and consumption data is easily accessible, whether directly by the consumer or through an authorised agent, people can make better choices with less effort, and competition can work more effectively in their favour.

We also recognise that a strong and competitive retail sector is vital to achieving these goals. Effective policy should balance the benefits of transparency and innovation with the need to keep compliance requirements proportionate, so that retailers can continue to invest in new products and services that deliver value for consumers.

ERGANZ emphasises the need for reforms to be targeted to the areas of highest impact, sequenced in a way that manages the load on market participants, and implemented with close collaboration with other agencies such as MBIE.

Electricity Product Data

ERANZ supports the policy direction towards “open electricity” under the Customer and Product Data Act and the Authority’s proposed changes to enable standardised, on-demand access to electricity product data.

These reforms have the potential to make price comparison and switching easier for consumers, promote competition, and deliver better value. We agree that the current arrangements for accessing product and tariff data are no longer fit for purpose in a digital, consumer-centric electricity market.

We recognise the benefits of a mandatory, standardised data-sharing regime, such as the proposed new suite of EIEP14 protocols (A–D). Standardised formats, available on demand, will give consumers and third parties a clearer, more accurate picture of the market, enabling faster switching and reducing friction. Alignment with the forthcoming Consumer Data Right framework will also help ensure a consistent, interoperable approach to data sharing across sectors, avoiding fragmentation and giving consumers greater control over their information.

At the same time, the Authority must carefully manage compliance costs and operational impacts for retailers. Delivering instantaneous, secure, and standardised data flows will require large investments in IT systems, API capability, secure exchange processes, and data governance. While these are justified where they clearly drive consumer benefit, we caution against capturing low-value or rarely-used data, such as historic or highly specialised plans (EIEP14-B protocols), without a robust cost–benefit case. Capturing and maintaining such information risks diverting resources from higher-impact reforms.

These reforms are also occurring in a wider environment of enormous change for the sector. Multiple government agencies and departments are running multiple legislative and regulatory change projects. The government needs an overall view on prioritisation in order to ensure meaningful progress with the projects most likely to benefit consumers and the sector.

ERGANZ recommends that the Authority sequence implementation in a way that prioritises the highest-impact protocols, those most likely to directly improve consumer switching and affordability, before phasing in more complex or lower-impact requirements. This will allow retailers to focus resources where they deliver the greatest benefit, and will help manage cumulative regulatory change. The Authority should also continue to work closely with MBIE to ensure that any technical, consent, and accreditation requirements under the CDR are proportionate, re-usable across sectors, and avoid bespoke builds for electricity alone.

Greater transparency will bring benefits, but it will also increase competitive pressure on retailers. We support this as part of a healthy market, but note that time is needed for retailers to adapt pricing, operations, and customer communications to the new environment. We encourage the

Authority to monitor for unintended consequences and to ensure the reforms remain focused on delivering long-term value to consumers.

Questions	Comments
Q1. Do you agree that improving access to product data will support consumer mobility through enabling innovation and informed choice?	Yes. ERGANZ supports improved, standardised access to product data as a means to make price comparison and switching easier for consumers, improve transparency, and enable innovative third-party tools.
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 sequencing implementation to prioritise the highest-impact changes first (e.g., EIEP14A and EIEP14C) and deferring lower-impact or high-cost requirements until proven benefits outweigh compliance burdens.
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?	<p>Yes. Alignment will ensure interoperability, avoid duplication, and provide a consistent framework for consent, verification, and API-enabled exchange across sectors.</p> <p>We encourage the Authority and MBIE to work closely together and to communicate jointly to market participants to demonstrate intra-government collaboration.</p>
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?	<p>Opportunities include reusability of technical and compliance systems across sectors and greater consumer trust, as stated above.</p> <p>In addition, care should be taken when analysing complex plans which involve dynamic consumer interactions, such as time-of-use plans, or bundling with associated products and services.</p> <p>Also, there are risks around recording and presenting eligibility rules (where plans are open, or heavily suited, to particular customers) to consumers, particularly when comparing plans.</p>

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?	<p>These definitions can be reconciled but will require careful alignment by the Authority and MBIE.</p> <p>There are important differences: 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.</p>
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.
Q7. Have you encountered specific operational or compliance barriers when trying to access or share product data?	Our members have, yes.
Q8. What are the most significant friction points for consumers when comparing and switching electricity plans today?	Energy-sector literacy is understandably low among the broad base of consumers. For example, ERGANZ Energy-Mate coaches going into people’s homes often encounter poor understanding of how things work, including the ability to compare and switch.
Q9. How would better access to standardised and on-demand product data improve outcomes for consumers and/or your organisation?	It would enable instant, accurate comparison tools, reduce switching effort, and improve pricing transparency, benefiting consumers and driving competition.
Q10. Do you agree with the proposed assessment criteria (effectiveness, efficiency, feasibility, and strategic alignment)? Are there other criteria we should consider?	<p>Yes. ERGANZ also suggests including “proportionality of compliance cost” as an explicit criterion.</p> <p>The Authority may also wish to consider adding “implementation risk”, to explicitly capture the</p>

	likelihood of delays and cost overruns with such a complex IT programme.
Q11. Do you have a view on which option (status quo, regulated EIEP14, new modular EIEPs) would deliver the most benefit and why?	Option 3, with modification. ERANZ supports the modular approach but does not support EIEP14B as proposed.
Q12. Do you agree with our preliminary assessment of the options presented above?	Broadly, yes – but the assessment should better reflect the high cost and low marginal benefit of implementing EIEP14B in its current form.
Q13. Are there elements of the existing EIEP14 that could be adapted or strengthened rather than replaced?	Certain structural elements and data fields could be retained, but the protocol should be redesigned for API-readiness and compatibility with CDR.
Q14. Are there any other barriers to using EIEP14 that we have not identified?	The question of whether it can handle complex or dynamic tariffs efficiently.
Q15. If option 3 (new modular EIEPs) is pursued, how should we best sequence implementation to ensure deliverability and minimise disruption?	Prioritise EIEP14A and EIEP14C first, with EIEP14D following once API infrastructure is ready. EIEP14B should be deferred or redesigned to avoid capturing vast volumes of bespoke, low-use 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?	No. Capturing historic or legacy offers would impose disproportionate compliance costs with minimal consumer benefit.
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.

<p>Q18. What practical limitations (if any) should apply to third-party requests for tariff data?</p> <p>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?</p> <p>Q18b. What additional provisions are needed to maintain data continuity during retailer exits, mergers, or other significant business changes?</p>	<p>Introduce reasonable request frequency limits to avoid system strain and ensure fair access.</p> <p>Phase in protocols, starting with batch-based responses before shifting to real-time APIs.</p> <p>Require timely final data uploads to a central repository accessible to authorised parties.</p>
<p>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?</p> <p>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?</p>	<p>Yes, if practical and consistently applied. But, the Authority needs to discuss with retailers how bespoke rates and conditions exist from customer to customer, even within the same plan.</p> <p>Therefore, the concept of a single identifier becomes harder to make useful for consumers.</p>
<p>Q20. Do you have any feedback on how these new protocols could be implemented?</p>	<p>As noted, we strongly recommend prioritising the development and implementation of a high-quality EIEP14-A protocol first.</p> <p>Once EIEP14-A is established, its structure and learnings can inform the design of customer-specific formats such as EIEP14-C.</p>
<p>Q21. What are the likely implementation costs (systems, processes, resourcing) for your organisation, and how could these be minimised?</p>	<p>High for EIEP14B, moderate for others. Minimise costs through phased rollout, reuse of existing systems, and alignment with CDR requirements.</p>
<p>Q22. What support, if any, would you find helpful during implementation (eg, technical guidance, test environments)?</p>	<p>Detailed technical guidance, API specifications, and test environments.</p>
<p>Q23. What compliance or assurance mechanisms (beyond Code compliance monitoring) would support effective data quality and adherence?</p>	<p>Regular data quality checks and targeted audits, rather than continuous reporting burdens.</p>

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?	ERGANZ's members wish to participate in co-design workshops and technical working groups.
Q25. Are there specific technical standards, platforms, or international practices the Authority should consider in designing API-based access?	Consider lessons learned from the Australian CDR technical standards for interoperability experience.
Q26. Do you have any feedback on the proposed implementation timeline, or additional risks or dependencies we should factor in?	ERGANZ supports a phased implementation approach that prioritises the development of a high-quality EIEP14-A specification as the first step.

Conclusion

ERANZ would like to thank the Authority for considering our submission.

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

Yours sincerely,

Kenny Clark
Policy Consultant