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Product Data Standards Consultation

Genesis welcomes the opportunity to provide feedback on the Electricity Authority's (**Authority**) "*Enabling consumer mobility by improving access to electricity product data*" consultation paper dated 15 July 2025.

Executive Summary

Genesis supports the objective of improving consumer mobility and choice. Our commitment is demonstrated through tangible innovation: our Energy IQ app serves over 80% of mass-market customers, our EV products offer cheaper energy than public charging, and our flexibility trials have delivered 17MW of peak demand management so far. We intend to grow our VPP and customer flex offerings to 150MW by FY28. These initiatives show that meaningful consumer empowerment can be achieved through improved access to data and innovative products.

We agree that standardised, accessible product data can support consumer mobility through more effective comparison tools, enabling third-party innovation, and reducing information asymmetries and friction that nay hinder consumer switching. We also acknowledge that the current arrangements under clause 11.32G of the Code and voluntary EIEP14 have limitations in terms of standardisation, response times, and machine-readable formatted information. These limitations are demonstrated by amongst other things, participants choosing to use alternatives to EIEP14.

Accordingly, **Genesis supports**:

- **Greater standardisation and machine-readable formats** that build upon proven international frameworks while avoiding Australia's Consumer Data Right (CDR) implementation challenges in their banking and electricity sectors.

- A **phased evidence based approach to Option 3 (new modular EIEPs)** as the most comprehensive long-term solution, provided implementation incorporates critical lessons from Australia's CDR experience.
- **Prioritising EIEP14A (generally available plans) and then EIEP14C (customer-specific data).** More complex protocols like EIEP14B (modified to exclude historical data) should only proceed if the evidence justifies this.

While we recognise that well-designed modular data standards can facilitate informed consumer choice and enable innovation in third-party services, Genesis emphasises the paramount importance of **rigorous cost-benefit analysis, realistic performance standards, and evidence-based phased implementation**. This position is consistent with the principles of 'Evidence-Informed Regulatory Practice' and 'Risk-Based Regulation' in guides recently published by New Zealand's Ministry for Regulation, which guide regulators to use evidence to make better decisions and focus finite resources where they will have the greatest impact.[1]

"Good idea, badly executed"

Australia's CDR experience provides a stark and cautionary tale for New Zealand's product data standards and the proposed consumer data right for the electricity sector.

That experience demonstrated a profound misalignment between the significant investment by industry and the very low consumer uptake and benefit realised to date. The Australian banking sector alone invested over $1.5 billion, with 97% of this going into compliance. Yet after four years of operation, the consumer uptake rate was a mere 0.31%.[2]

The roll out of the CDR in the Australian electricity sector experienced even greater challenges, including the abandonment of the core technical architecture mid-implementation as prohibitively expensive, forcing costly system rebuilds across the entire industry.[3]

Australia's multi-year rollout in the banking and electricity sectors included official delays and a strategic "pause" in 2023 to allow time for the CDR to mature and implement lessons learnt. The Australian government explicitly acknowledged concerns that the CDR was expanding too quickly, describing the CDR as a "good

[1] Refer https://www.regulation.govt.nz/support-for-regulators/resources-for-regulators/quick-guide-evidence-informed-regulatory-practice/ and https://www.regulation.govt.nz/assets/Resource-Documents/RPE-Quick-Guide-Regulatory-Approaches-Models-and-Tools.pdf
[2] Refer https://www.ausbanking.org.au/wp-content/uploads/2024/07/CDR-Strategic-Review_July-2024.pdf, and https://treasury.gov.au/sites/default/files/2024-08/p2024-512569-report.pdf
[3] Refer https://www.energycouncil.com.au/analysis/consumer-data-right-kicks-off-in-energy/, https://www.ashurst.com/en/insights/resetting-australias-consumer-data-right/

idea, badly executed" and in need of a reset.[4] This represents one of the most significant regulatory implementation failures in recent Australian history.

The **execution risk in New Zealand is heightened** because the Authority and MBIE are running parallel overlapping workstreams – the Authority with the product data standards and MBIE with the proposed consumer data right for the electricity sector.

Accordingly, Genesis considers the critical implementation requirements to include:

- **Extremely close coordination with MBIE's parallel electricity sector CDR workstreams:** Without coordinated development, retailers face the prospect of building costly duplicate technical solutions to meet similar but incompatible requirements from different regulators with different regulatory objectives.

- **Sector-Appropriate Performance Standards:** Response time requirements for product (and consumer) data must reflect electricity sector realities (e.g. 5-10 seconds) rather than the near instantaneous banking-sector standards to avoid unnecessary costs.

- **Demonstrated demand:** Each implementation phase must validate consumer uptake before expanding scope, given current minimal engagement with data access (Genesis receives consumption data requests for <0.5% of ICPs annually and on average, 2-3 retail tariff requests per month).

- **Cost-Benefit Discipline:** Comprehensive analysis at each phase to ensure benefits justify implementation costs that ultimately pass through to consumers.

- **Reasonable Implementation Timeline:** 18-24 months per phase to ensure system reliability and cost-effectiveness.

Genesis asks that the Authority work closely with MBIE and the sector to ensure product data standards and exchange protocols form the foundation layer for the electricity sector's CDR requirements, enabling unified technical solutions that serve both regulatory objectives cost-effectively. Our responses to the consultation question in the Schedule to this submission contains suggestions on how this might be achieved, and Genesis is keen to contribute to joint technical working groups on the electricity CDR and product data standards.

[4] Refer https://www.ashurst.com/en/insights/resetting-australias-consumer-data-right/

Genesis is committed to working constructively with the Authority, MBIE and the wider industry to build a better energy future for Aotearoa New Zealand. This future must, however, be built on a foundation of sound evidence, prudent investment, and a commitment to the long-term interests of all consumers. We urge the Authority to adopt the phased evidence based approach recommended in this submission.

Yours sincerely

Warwick Williams
Senior Regulatory Counsel | Group Insurance Manager

SCHEDULE

Questions	Comments
Q1. Do you agree that improving access to product data will support consumer mobility through enabling innovation and informed choice?	Genesis supports the objective of improving consumer mobility and choice. Our commitment is demonstrated through tangible innovation: our Energy IQ app serves over 80% of mass-market customers, our EV products offer cheaper energy than public charging, and our flexibility trials have delivered 17MW of peak demand management so far. We intend to grow our VPP and customer flex offerings to 150MW by FY28. These initiatives show that meaningful consumer empowerment can be achieved through improved access to data and innovative products. We agree that standardised, accessible product data can support consumer mobility through more effective comparison tools, enabling third-party innovation, and reducing information asymmetries and friction that may hinder consumer switching. We also acknowledge that the current arrangements under clause 11.32G of the Code and voluntary EIEP14 have limitations in terms of standardisation, response times, and machine-readable formatted information. These limitations are demonstrated by amongst other things, participants choosing to use alternatives to EIEP14. Genesis agrees that improving access to standardised product data can support consumer mobility, but with important caveats about implementation approach and cost-benefit analysis. As Genesis noted in our October 2024 submission to MBIE's Consumer Data Right consultation, a carefully designed electricity CDR that applies the lessons learned from other countries has the potential to materially benefit consumers, retailers and other market participants.[5]

[5] See https://www.mbie.govt.nz/dmsdocument/30325-genesis-exploring-a-consumer-data-right-for-the-electricity-sector-submission-pdf

	However, access to data alone does not automatically deliver consumer benefits. Our experience shows that simply making consumption data and product data more widely available is costly, and does not automatically lead to the benefits anticipated. Genesis experience is that there is minimal current engagement by third parties despite product data (and increased consumption data) access. We receive on average 2-3 retail tariff requests per month and consumption data requests from around 11 agents for <0.5% of Genesis ICPs annually. This low engagement highlights the importance of ensuring there is demonstrable demand before mandating costly system changes. Australia's CDR experience also provides a cautionary tale, demonstrating a profound misalignment between the significant investment by industry and the very low consumer uptake and benefit realised to date. The Australian banking sector alone invested over $1.5 billion, with 97% of this going into compliance. Yet after four years of operation, the consumer uptake rate was a mere 0.31%.[6] The roll out of the CDR in their electricity sector experienced even greater challenges, including the abandonment of the core technical architecture mid-implementation as prohibitively expensive, forcing costly system rebuilds across the entire industry.[7] Australia's multi-year rollout in the banking and electricity sectors included official delays and a strategic "pause" in 2023 to allow time for the CDR to mature and implement lessons learnt. The Australian government explicitly acknowledged concerns that the CDR was expanding too quickly, describing the CDR as a "good idea, badly executed" and in need of a reset.[8] This represents one of the most significant regulatory implementation failures in recent Australian history. This is why, while Genesis recognises that well-designed modular data standards can facilitate informed consumer choice and enable innovation, we emphasise the paramount importance of rigorous cost-benefit analysis, realistic performance standards, and evidence-based phased implementation.

[6] Refer https://www.ausbanking.org.au/wp-content/uploads/2024/07/CDR-Strategic-Review_July-2024.pdf, and https://treasury.gov.au/sites/default/files/2024-08/p2024-512569-report.pdf
[7] Refer https://www.energycouncil.com.au/analysis/consumer-data-right-kicks-off-in-energy/, https://www.ashurst.com/en/insights/resetting-australias-consumer-data-right/
[8] Refer https://www.ashurst.com/en/insights/resetting-australias-consumer-data-right/

	This position is consistent with the principles of 'Evidence-Informed Regulatory Practice' and 'Risk-Based Regulation' in guides recently published by New Zealand's Ministry for Regulation, which guide regulators to use evidence to make better decisions and focus finite resources where they will have the greatest impact.[9] As we discuss in more detail below, Genesis supports: • Greater standardisation and machine-readable formats that build upon proven international frameworks while avoiding Australia's Consumer Data Right (CDR) implementation challenges in their banking and electricity sectors. • A phased evidence based approach to Option 3 (new modular EIEPs) as the most comprehensive long-term solution, provided implementation incorporates critical lessons from Australia's CDR experience. • Prioritising EIEP14A (generally available plans) and then EIEP14C (customer-specific data). More complex protocols like EIEP14B (modified to exclude historical data) should only proceed if the evidence justifies this. Relative to Australia, the execution risk in New Zealand is heightened because the Authority and MBIE are running parallel overlapping workstreams – the Authority with the product data standards and MBIE with the proposed consumer data right for the electricity sector. Accordingly, we believe that the critical implementation requirements include: • extremely close coordination with MBIE's parallel electricity sector CDR workstream; • electricity sector appropriate performance standards; • demonstrated demand before expanding the scope of product data; • comprehensive cost-benefit analysis at each phase;

[9] Refer https://www.regulation.govt.nz/support-for-regulators/resources-for-regulators/quick-guide-evidence-informed-regulatory-practice/ and https://www.regulation.govt.nz/assets/Resource-Documents/RPE-Quick-Guide-Regulatory-Approaches-Models-and-Tools.pdf

	• reasonable implementation timelines.
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?	Please see response in Q3 below.
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?	Genesis agrees that alignment with a potential CDR is essential for efficient implementation – the two are inextricably linked. Further, we urge careful consideration of Australia's costly CDR experience to avoid repeating their challenges. Reasons for Alignment: 1. Technical and Cost Efficiency: Aligned standards avoid industry participants implementing multiple, potentially conflicting data exchange requirements. This reduces total implementation costs and technical complexity. 2. Future-Proofing Investment: Ensures current investments can support potential future CDR implementation without requiring costly system rebuilds. 3. International Standards Leverage: Utilising proven international standards reduces development costs and technical risks compared to developing bespoke New Zealand solutions. Critical Lessons from Australia's CDR Experience: • Performance Standards Must Reflect Sector Realities: Australia's CDR imposed banking-sector response time requirements (1-2 seconds) on energy retailers, significantly increasing system costs. As Genesis noted in our CDR submission a 5-10 second response time is more appropriate in the electricity context and would lower system build costs considerably. New Zealand should establish sector appropriate standards from the outset. • Cost-Benefit Validation Essential: Australia's experience shows significant costs have been incurred to implement the banking and energy CDRs, with limited uptake and benefit for

	consumers. New Zealand must demonstrate clear consumer demand and value before mandating comprehensive implementation. • Implementation Complexity Requires Extended Timeframes: Australia's CDR faced significant delays and cost overruns due to ambitious technical requirements and compressed timelines. New Zealand should plan for 18-24 month implementation phases to ensure system reliability and cost management. **Specific Alignment Recommendations:** Technical Standards Development: • Leverage Australia's investment in CDR API standards and security frameworks while adapting performance requirements for electricity sector, • Use proven authentication and consent management approaches rather than developing new systems. • Adopt standardised data formats that support interoperability while reflecting New Zealand market characteristics. Phased Implementation Approach: • Start with basic product data standards (EIEP14A) and expand based on demonstrated consumer value (see further discussion below). • Validate third-party service sustainability before expanding scope to complex arrangements. • Coordinate timing with MBIE's CDR development to avoid duplication and conflicting requirements. Cost Management Framework: • Apply Australia's lessons about technical requirement impacts on system costs. • Establish realistic performance standards that balance consumer expectations with implementation affordability. • Monitor Australian CDR evolution to incorporate improvements and avoid repeating mistakes in New Zealand.

	Guiding Principles:
	
	We suggest the following key guiding principles:
	
	• Evidence-Based Progression: Each expansion phase must demonstrate consumer adoption and value before proceeding
	• Technical Standard Pragmatism: Adopt requirements appropriate to electricity sector rather than copying banking applications
	• Cost Escalation Prevention: Regular cost-benefit assessment with ability to adjust scope if costs exceed demonstrated benefits
	
	Urgent Need for Electricity Authority / MBIE Technical Standards Coordination
	
	Genesis supports CDR alignment and notes that MBIE's July 2025 consultation (which is a targeted non-public consultation) reveals concerning disconnects that require immediate attention.
	
	• Performance Standards Conflict: MBIE proposes "instantaneous/near instant" data delivery which, while appropriate for the banking sector, is not appropriate for the electricity sector. Genesis recommends 5-10 second threshold for the electricity sector. This fundamental disconnect could result in:
	  ○ conflicting regulatory requirements forcing retailers to choose between compliance frameworks
	  ○ cost escalation as premium infrastructure designed for banking applications inappropriately applied to electricity sector
	  ○ technical complexity requiring separate systems/API development and maintenance
	
	• Data Definition Overlaps: Both consultations address product data requirements with potential inconsistencies in:
	  ○ data schema specifications and validation requirements
	  ○ API authentication and security frameworks

	○ consumer consent and verification processes ○ performance monitoring and compliance reporting We note that Australia's CDR faced significant implementation challenges from uncoordinated regulatory development between energy market authorities and CDR administrators, resulting in duplicate costs and conflicting requirements that New Zealand can avoid. **Recommendation:** Genesis urges the Authority to establish coordination mechanisms with MBIE including: • joint technical working groups developing unified API specifications; • shared performance standards appropriate for electricity sector applications; • coordinated implementation timelines preventing industry capacity conflicts; • combined cost-benefit analysis ensuring consumer value justifies total implementation costs. The success of both initiatives depends on treating them as complementary components of unified data access framework rather than separate regulatory requirements.
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?	**Additional Opportunities:** <u>Leveraging Australia's experience</u> New Zealand can benefit from Australia's substantial CDR infrastructure investment and standards development while implementing more cost-effective, sector-appropriate requirements. This includes adopting proven frameworks, schema and security standards while establishing realistic performance requirements that reflect electricity sector needs rather than banking applications. <u>Sector-Appropriate Technical Standards</u> Australia's experience demonstrates that electricity data access requirements differ significantly from banking applications. New Zealand has the opportunity to establish 5-10 second response time standards that balance consumer expectations with system costs, rather than copying the banking-sector requirements that led to significant cost escalation in Australia. <u>Regulatory Efficiency and Coordination</u>

	Coordinated development between the Authority and MBIE can reduce regulatory duplication, conflicting requirements, and industry compliance costs. This includes shared technical specifications, testing environments, and implementation support resources. **Risks Requiring Careful Management:** <u>Cost Escalation Without Proportionate Consumer Benefit</u> Australia's CDR experience shows significant costs have been incurred to implement the banking and energy CDRs, with limited uptake and benefit for consumers. Key risk factors include: • Technical Over-Engineering: Banking-sector performance requirements unnecessarily increase electricity retailer system costs • Scope Creep: Comprehensive data requirements without validated consumer demand lead to "gold-plating" of systems • Implementation Timeline Pressure: Compressed schedules increase premium resourcing costs and technical risks <u>Equity and Consumer Protection Concerns</u> As Genesis noted in our submission on multiple trading relationships, there is the risk of an inequitable and perverse outcome where the 'have nots' subsidise the 'haves'. The CDR alignment risks include implementation costs socialised across all consumers while benefits accrue primarily to technology-enabled, affluent customers or to third party service providers. We note that in Australia's 2022 statutory review of the CDR, public interest groups were concerned that the CDR implementation was increasingly prioritising market development and utility for potential data recipients, over the interests of consumers and protecting against consumer harms, detracting from the original intent of the CDR.[10] <u>Technical Implementation and System Integration Risks</u>

[10] See the Public Interest Advocacy Centre's submission at https://treasury.gov.au/sites/default/files/2022-09/c2022-314513-public_interest_advocacy_centre.pdf

	Genesis anticipates substantial investment to establish and maintain automated processes and systems as our infrastructure and systems are complex, requiring careful integration. Specific risks include: • Legacy System Compatibility: Many retailers operate systems not designed for real-time API access • Security and Privacy Vulnerabilities: Expanded data sharing increases cyber security risks and compliance requirements • System Performance Under Load: Electricity data access patterns may strain systems designed for different usage models **Risk Mitigation based on the Australian lessons:** <u>Evidence-Based Implementation Phases</u> • Start with basic generally available plan data (EIEP14A) to validate consumer demand before expanding • Require demonstrated consumer adoption thresholds before proceeding to complex protocols • Regular cost-benefit reassessment with ability to adjust scope if costs exceed proven benefits <u>Appropriate Technical Standards</u> • Establish electricity sector-appropriate response time requirements (5-10 seconds) rather than banking standards • Design for system reliability and data accuracy rather than maximum speed • Validate performance requirements against real consumer needs and usage patterns <u>Consumer Protection Safeguards</u> • Monitor implementation costs and their impact on consumer pricing • Ensure third-party service quality standards protect consumer interests • Maintain competitive market structure rather than enabling platform dominance <u>International Monitoring and Adaptation</u>

	• Regular consultation with Australian CDR implementers to incorporate evolving lessons learned • Flexibility to adjust New Zealand's approach based on Australia's ongoing experience • Benchmarking against Australian consumer adoption patterns and cost-effectiveness outcomes Genesis supports CDR alignment and emphasises that success requires learning from Australia's expensive experience to implement more consumer-focused, cost-effective standards appropriate to New Zealand's electricity sector. <u>Regulatory Duplication and Coordination Failure Risks</u> We consider uncoordinated regulatory development a critical risk to be mitigated carefully. MBIE and the Authority's concurrent CDR and product data workstreams gives rise to material risks if not properly coordinated: <u>Technical Requirement Conflicts:</u> • MBIE's "instantaneous" delivery standards vs. electricity sector-appropriate response times creating costly compliance scenarios • Duplicate systems and schema development requirements increasing costs without proportionate consumer benefits • Potentially conflicting data validation and security frameworks requiring separate technical solutions <u>Implementation Timeline Conflicts:</u> • MBIE seeking Cabinet CDR decisions while Authority consulting on 6-month EIEP implementation • Overlapping regulatory requirements overwhelming industry technical and project management capacity • Timeline pressure forcing rushed implementation increasing costs and reducing system reliability <u>Cost escalation due to regulatory duplication:</u> Uncoordinated development could increase total implementation costs significantly compared to unified approach, as retailers may be required to:

	• Build separate technical infrastructure for similar data requirements • Maintain duplicate compliance and monitoring systems • Train staff on multiple regulatory frameworks • Manage parallel vendor relationships and support arrangements <u>Risk Mitigation:</u> Genesis recommends the Authority engage with MBIE to: • Establish joint governance framework for coordinated standard development • Establish joint technical working groups • Create unified technical specifications serving both regulatory objectives • Develop shared implementation timeline preventing industry capacity conflicts • Conduct combined cost-benefit analysis ensuring consumer value justifies total investment
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?	Genesis recommends that the definitions are aligned by: • Focusing initial product data standards on genuinely comparable, generally available plans i.e. adopting the generally available retail tariff plan as defined in the Code. • Excluding bespoke, negotiated, or highly conditional offers that cannot be meaningfully compared. This can be expanded if necessary as the CDR and product data standard matures and the evidence justifies it – see further discussion below.
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?	We agree that changes are required as discussed above, and implemented in a phased evidence based approach. We note that the consultation suggests retailers could implement new processes within six months of the protocols and Code being finalised. We strongly disagree. Genesis considers this timeframe unrealistic given system integration complexity and the need to align with the CDR work. We recommend allowing 12-18 months for full implementation of the first phase. See also comments below.

Q7. Have you encountered specific operational or compliance barriers when trying to access or share product data?	Genesis encounters several practical barriers under current arrangements that support the case for improved standardisation: • Manual Processing Requirements: Current clause 11.32G arrangements require manual intervention for each request, creating administrative burden and delays. Genesis typically processes data requests manually. • Format Inconsistency: Different requestors ask for data in varying formats, requiring Genesis to reformat the same underlying information. This creates unnecessary cost and increases error risk.
Q8. What are the most significant friction points for consumers when comparing and switching electricity plans today?	Plan complexity and comparability represent a significant barrier to effective consumer choice. We consider the primary friction points to arise from: • Tariff Structure Complexity: Modern electricity plans often include multiple rate components (fixed charges, variable rates, time-of-use periods, demand charges) that make direct comparison challenging. • Conditional Offers and Bundling: Many retailers offer conditional discounts, bundled services, or promotional rates that cannot be easily compared. • Usage Profile Dependence: Plan suitability heavily depends on individual consumption patterns, timing, and appliance mix.
Q9. How would better access to standardised and on-demand product data improve outcomes for consumers and/or your organisation?	See comments above.
Q10. Do you agree with the proposed assessment criteria (effectiveness, efficiency, feasibility, and strategic alignment)? Are there other criteria we should consider?	We agree with the criteria noting that efficiency is particularly important given Genesis's consistent emphasis on ensuring benefits justify costs. Additional criteria to consider:

	• Data Quality and Reliability: Criteria should evaluate proposals' ability to ensure data accuracy, completeness, and timeliness, as these factors are critical for consumer trust. • Implementation Risk: Assessment should consider technical complexity, system integration challenges, and potential for implementation delays or cost overruns. • International Alignment and Learning: Criteria should assess how proposals leverage international experience, particularly lessons from Australia's CDR implementation challenges. We recommend that efficiency (cost-benefit analysis) and feasibility receive significant weighting, given the substantial implementation costs likely to be involved and the need to learn from Australia's experience with CDR cost escalation.
Q11. Do you have a view on which option (status quo, regulated EIEP14, new modular EIEPs) would deliver the most benefit and why?	See response to Q15 below.
Q12. Do you agree with our preliminary assessment of the options presented above?	Broadly yes, subject to the caveats discussed above.
Q13. Are there elements of the existing EIEP14 that could be adapted or strengthened rather than replaced?	Yes, several elements of EIEP14 provide a solid foundation that could be enhanced rather than completely replaced. Elements to Preserve: • Basic Data Structure: The current EIEP14 data fields capture essential tariff components that remain relevant for enhanced protocols. • Industry Familiarity: Retailers and some third parties already understand EIEP14 concepts, reducing training and transition costs.

	• Established Data Exchange Principles: The underlying approach of structured data exchange is sound and proven. Specific Enhancements: • Mandatory Implementation: Convert from voluntary to regulated requirement with clear compliance obligations and timelines. • Expanded Data Fields: Include modern tariff structures in alignment with MBIE's proposed product data requirements. • Machine-Readable Formats: Standardise on modern data exchange formats (JSON, XML) that support automated processing. • Response Time Standards: Establish clear performance requirements for data provision (e.g., within 24 hours for standard requests). • Data Quality Requirements: Define minimum standards for data accuracy, completeness, and currency.
Q14. Are there any other barriers to using EIEP14 that we have not identified?	See comments above.
Q15. If option 3 (new modular EIEPs) is pursued, how should we best sequence implementation to ensure deliverability and minimise disruption?	Genesis supports: • Greater standardisation and machine-readable formats that build upon proven international frameworks while avoiding Australia's Consumer Data Right (CDR) implementation challenges in their banking and electricity sectors.

	• A phased evidence based approach to Option 3 (new modular EIEPs) as the most comprehensive long-term solution, provided implementation incorporates critical lessons from Australia's CDR experience. • Prioritising EIEP14A (generally available plans) and then EIEP14C (customer-specific data). More complex protocols like EIEP14B (modified to exclude historical data) should only proceed if the evidence justifies this. Genesis strongly recommends a carefully phased approach that validates consumer demand and system performance at each stage while incorporating lessons from Australia's CDR implementation. Genesis endorses **Option 3 (new modular EIEPs)** as the optimal long-term solution, provided New Zealand learns from Australia's expensive mistakes and implements a disciplined, evidence-based approach. Australia's Consumer Data Right implementation offers a cautionary tale—like building a Ferrari for grocery shopping. The banking and electricity sectors invested heavily in sophisticated infrastructure, yet consumers barely used it. This expensive lesson teaches us that good intentions without proven demand create costly white elephants. **Critical Success Factors** <u>1. Prove Value Before Building</u> We must demonstrate genuine demand at each phase rather than assuming "if we build it, they will come." Current evidence shows minimal engagement with existing data access systems — a red flag that cannot be ignored. <u>2. Set Realistic Technical Standards</u> Electricity differs fundamentally from banking. While banks need instantaneous transaction processing, electricity data can reasonably take 5-10 seconds to deliver. Forcing banking-speed requirements onto electricity systems unnecessarily inflates costs without adding consumer value.

	3. Conduct Rigorous Cost-Benefit Analysis Every protocol implementation must pass a strict value test. Australia's experience demonstrates how costs can escalate dramatically when authorities mandate systems without proving their worth. 4. Coordinate with MBIE's CDR Development Building separate technical infrastructures for similar objectives wastes resources and confuses consumers. We need one unified foundation, not competing regulatory towers. **Phased Implementation** Phase 1: EIEP14A (18-24 months) • Implement generally available plans with CDR-compatible architecture • Establish baseline technical framework • Validate consumer/third party engagement levels Phase 2: EIEP14C (24-36 months) • Add customer-specific data based on demonstrated third-party uptake • Build on proven technical foundation • Monitor system performance and costs Phase 3: EIEP14D (36-48 months) • Deploy API framework with mature technical standards • Leverage accumulated experience and demand evidence Phase 4: EIEP14B Assessment • Consider implementation only if previous phases prove sustainable benefits • Exclude historical data to manage complexity and costs **Coordination Requirements**

	Technical Architecture MBIE and the Authority must design modular EIEPs as the foundation layer supporting both regulatory frameworks. This prevents the costly duplication that plagued Australia's implementation. Performance Standards We recommend establishing unified 5-10 second response time standards across both frameworks. MBIE's proposed "instantaneous" requirements conflict with electricity sector realities and would unnecessarily inflate system costs. Implementation Sequencing Joint technical working groups should align product data standards, ensuring electricity sector CDR builds upon rather than duplicates EIEP infrastructure. Without coordination, New Zealand faces: • Cost escalation from building duplicate technical solutions • Timeline conflicts that overwhelm industry capacity • Reduced innovation as resources shift from consumer benefits to regulatory compliance • Complex compliance burdens that ultimately increase consumer costs **Recommendation** The Authority should treat EIEP and MBIE initiatives as components of a unified data access strategy. This requires: 1. Establishing joint technical working groups with MBIE 2. Mandating coordinated technical standards before implementation begins 3. Requiring evidence-based justification for each protocol before deployment 4. Setting realistic timelines that allow proper testing and validation
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. Genesis strongly opposes EIEP14B and any requirement to capture historic offers for fundamental cost-benefit and consumer value reasons. Historical Data Provides Negligible Consumer Value

	• Consumer Comparison Focus on Current Market: Consumers seeking to compare and switch electricity plans need information about currently available options, not historical arrangements they cannot access. Historical plan data creates confusion rather than clarity in consumer decision-making. • Irrelevant Information Overload: Including legacy plans that consumers cannot sign up for dilutes the effectiveness of comparison tools and creates information noise that obscures rather than illuminates current market choices. • No Switching Value: Historical plans provide no actionable information for consumers' current switching decisions. The goal of improved data access is to facilitate informed choice among available options, not to provide historical market analysis. <u>Legacy System Data Extraction and Maintenance Costs:</u> Many historical plans exist in outdated systems or formats requiring extensive manual processing. Extracting and standardising historical plan data could require: • Database archaeology: Significant IT resources to access legacy systems and reconstruct historical plan structures • Manual data validation: Historical plans often lack standardised documentation requiring costly manual review and verification • System integration complexity: Creating APIs for historical data requires separate technical development with minimal ongoing utility Ongoing Maintenance Burden: Historical data requires continuous maintenance, validation, and format updates without corresponding consumer benefit:

	• Data accuracy verification: Ensuring historical plan details remain correctly represented in standardised formats • System performance impact: Large volumes of rarely-accessed historical data degrading system performance for current plan queries • Compliance complexity: Managing data quality and audit requirements for information with no current consumer application
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?	EIEP14B should be excluded entirely rather than implemented with limitations. Historical and legacy plan data provides negligible consumer value regardless of how limitations are structured. Consumers need current, available plan information - not archives of plans they cannot access. Even with limitations, EIEP14B would require substantial retailer investment in: • Legacy system integration and data extraction • Historical data validation and standardisation • Ongoing maintenance of rarely-used information • API development for minimal-value data sets Rather than attempting to design workable limitations for EIEP14B, Genesis recommends the Authority prioritise EIEP14A. See also comments above.
Q18. What practical limitations (if any) should apply to third-party requests for tariff data? Q18a. Do you think any interim measures should be considered as part of the new protocols, to facilitate the transition to the on-demand access to product data? If so, what are your suggestions? Q.18b. What additional provisions are needed to maintain data continuity during retailer exits, mergers, or other significant business changes?	See comments above.

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 support unique identifiers based on what retailers already use for their plans.
Q20. Do you have any feedback on how these new protocols could be implemented?	See comments above.
Q21. What are the likely implementation costs (systems, processes, resourcing) for your organisation, and how could these be minimised?	See comments above.
Q22. What support, if any, would you find helpful during implementation (eg, technical guidance, test environments)?	Technical guidance and pilot testing would be helpful. See comments above.
Q23. What compliance or assurance mechanisms (beyond Code compliance monitoring) would support effective data quality and adherence?	See comments above.
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?	Genesis strongly supports collaborative co-design that leverages industry expertise while ensuring consumer-focused outcomes. We are keen to participate in and contribute to joint Electricity Authority / MBIE technical working groups.

Q25. Are there specific technical standards, platforms, or international practices the Authority should consider in designing API-based access?	See comments above – particularly, in relation to learning from the Australian CDR experience.
Q26. Do you have any feedback on the proposed implementation timeline, or additional risks or dependencies we should factor in?	See comments above.