Submission by Kristy Hoare - Managing Director of My Solar Quotes

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

Yes. Better access to product data empowers consumers to compare providers properly. Most Kiwis don't have clear visibility today.

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?

Integration with other smart systems. If product data is easily machine-readable, EV charging apps or home energy management platforms can integrate and figure out the best time to either import or export power.

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. Alignment makes total sense. If the EA builds its exchange formats to mesh with a future CDR scheme, consumers benefit from consistency across industries (banking, telco, power). That reduces integration costs for third-party developers and speeds up rollout.

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?

If aligned with broader CDR norms, NZ-based energy fintechs could more easily scale overseas, boosting our market and expertise.

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?

No comment

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 agree. It's clunky and outdated. Bilateral data-sharing agreements are slow, inconsistent, and favour the big players. That's a huge barrier for startups and solar service platforms (like My Solar Quotes) trying to build tools that help consumers make smart, real-time decisions.

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

Yes, plenty. I help consumers figure out who the best energy retailer is to switch to once they have solar. The lack of access to product data hinders consumer or "prosumers" from making the cheapest or best option.

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

- Lack of apples-to-apples comparison. No standardised way to compare the myriad of considerations when switching: feed-in rates, time-of-use plans, bundled offers, or how those 'free hours of power' really stack up.
- Solar customers are often lured in with a high buy-back rate, only to discover they're paying more for power than non-solar customers on the same retailer. The lack of transparency leaves solar users feeling ripped off.

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

At My Solar Quotes, we could:

- Build new tools that match customers with the best electricity plan for their solar setup based on real usage and pricing data.
- Help customers understand their true payback period with solar + battery, based on actual retailer tariffs.
- Increase switching, which pressures electricity companies to improve value and transparency.

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

I agree with the criteria

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

Unsure - as the two options are a little bit blurry to me. Whatever is chosen needs to be mandatory and as standardised as possible to help consumers compare energy retailers easily.

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

Yes, I largely agree. You've correctly identified that the status quo is inadequate. The EA should push ahead with a modernised framework that encourages innovation while maintaining data quality and interoperability.

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

If you're going to bridge to a better system, EIEP14 could be tweaked in the short term to:

- Include solar-specific info (buy-back rates, export limits)

- Standardise how time-of-use rates are expressed

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

Again, still a bit unsure on EIEP14's full function. But I want to make sure there have been considerations for solar households, i.e. battery-specific offers, export caps, smart home integrations, or dynamic pricing. I am not sure if it accounts for how plans interact with solar and battery hardware or services, which is increasingly common in the solar + battery world.

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

Soft launch with feedback loops: Start with pilot retailers and allow others to opt in before making it mandatory. Build with installers, tech platforms, and consumers involved.

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, that would be useful. As it would be a benchmark to see what's changed.

Q17. If option 3 is pursued, are there practical limitations the Authority should consider? (For example, should plans that are no longer offered be included?)

Not that I know of, but sure there will be plenty of limitations offered by Energy Retailers. I am wary of their suggested limitations causing a watered down version of this data resource.

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

Third parties requesting access should be vetted to ensure they'll use the data responsibly and have appropriate security measures in place. At the same time, the verification process must be fair, transparent, and not skewed in favour of incumbent players. It's crucial that startups and innovators offering new, consumer-focused services aren't locked out by overly burdensome or biased access rules.

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?

Possibly a minimum viable product should be considered, before a full rollout.

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

Mandatory data archiving: Require outgoing retailers to submit a final tariff snapshot to a central EA registry before exiting or merging.

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 - 100%. Unique identifiers like a SKU will eliminate a lot of confusion, as I am sure the database will be filled with hundreds of plans.

Q19a. If yes, how should the unique identifier system be designed and administered to ensure that it is practical, consistent and does not add unnecessary compliance costs?

To keep it easy, something like a logical format so EA doesn't have to be involved in providing IDs

Example: [RetailerCode]-[InternalName]-[Version]-[EffectiveDate]
Meridian-SolarStarterPlan-V2-12092025

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

NA

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

For My Solar Quotes, implementation costs would be high, as I would be being a new tool from scratch. But these suggestions would help minimise costs:

- Clear technical specs early on (avoid backtracking or rework)
- Access to sample/mock data to build and test before live data is required

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

- A live test environment with sample plan data (including solar buy-back pricing structures)
- A technical support channel (or working group) for quick answers during integration

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

- Validation at the point of data submission (catch format or logic errors)
- Data quality dashboards showing how frequently retailers update and correct their plan data

Side note: I trust all retailers will do their best to upload accurate data, as I am sure claims of false advertising will catch up with them if not?

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?

As an independent platform operator, I'd welcome involvement in co-design. It's important that the co-design isn't dominated by retailers. Platforms like My Solar Quotes and Powerswitch should have a meaningful seat at the table. We're the ones focused on making the energy market more transparent and consumer-friendly, so our input is essential to get this right.

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

Please look into Australia's Consumer Data Right for how it formats and provides solar export data, as their solar market is much more evolved than ours.

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

My concern as normal is that the large retailers dominate the narrative, while smaller players and innovators are left behind.