

Electricity Authority Te Mana Hiko  
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Via email: [consumer.mobility@ea.govt.nz](mailto:consumer.mobility@ea.govt.nz)

12 August, 2025

To whom it may concern,

Thank you for the opportunity to provide feedback on the Electricity Authority's consultation regarding improving access to electricity product data.

We support initiatives that simplify electricity plan comparisons and enable informed consumer choice, as we regularly see customers struggle with inaccurate calculations when comparing retailers' pricing. We believe standardising data formats will be important for the New Zealand electricity market.

Please see answers to specific questions in the table below.

Kind regards,

Steve Young

Head of Data and Industry Operations

Submitter	Octopus Energy New Zealand Limited
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Questions	Comments
Q1. Do you agree that improving access to product data will support consumer mobility through enabling innovation and informed choice?	<p>We agree. Comparing plans is currently very complex. We regularly see wildly inaccurate calculations from customers or prospective customers trying to compare our pricing to that of other retailers. In some cases we, industry participants, struggle to interpret certain other retailers' bills or tariffs.</p> <p>Improving and standardising data formats will allow for more systematic comparison of</p>

	<p>pricing plans and, if implemented well, could simplify this for consumers and put an end to confusing and sometimes quite misleading comparisons.</p> <p>Standardised data formats and alignment with the Consumer Data Right (CDR) should be prioritised ahead of things such as enforcing standardised bill formats. The data has much wider usability and power to inform than billing documents and will be faster and easier for retailers to implement.</p>
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?	<i>Not answered</i>
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>Absolutely. Much of what is suggested in this consultation paper will be encompassed in the CDR programme of work. Any changes implemented by the Electricity Authority prior to CDR should align with CDR to minimise re-work and set up costs. Ideally, if the EA changes precede CDR, the product and tariff data sets would be assumed/adopted for CDR.</p>
Q4. Are there additional opportunities or risks the Authority should consider in aligning improved access to electricity product data with a	<p>CDR designation is not a foregone conclusion so waiting for a decision on this front could delay improvements and the subsequent benefits. However, as long as the Authority is working closely with the MBIE CDR team, coming up with a data</p>

potential CDR designation and implementation?	format that fits both purposes should be possible.
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?	Both are intended for more or less the same purpose - to allow consumers and third parties to compare and determine the best offer for consumers. They should be as closely aligned as possible.
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. EIEP14 is a clunky and hard to use format.
Q7. Have you encountered specific operational or compliance barriers when trying to access or share product data?	<i>Not answered</i>
Q8. What are the most significant friction points for consumers when comparing and switching electricity plans today?	Comparing Time of Use with flat priced plans, along with the general over-inflating of savings from “free periods” lead to some wildly inaccurate comparisons. Comparison sites tend to use currently available plans -

	which leads to further inaccuracies if the customer is on a different plan to the retailer's currently available ones. Unless the consumer is good with a spreadsheet and has a year of usage data and an understanding of how much they can realistically move, deciding on the best plan for their situation is largely guesswork.
Q9. How would better access to standardised and on-demand product data improve outcomes for consumers and/or your organisation?	Anything that makes comparing plans easier and more accurate will improve consumer outcomes.
Q10. Do you agree with the proposed assessment criteria (effectiveness, efficiency, feasibility, and strategic alignment)? Are there other criteria we should consider?	We agree
Q11. Do you have a view on which option (status quo, regulated EIEP14, new modular EIEPs) would deliver the most benefit and why?	A new format is required. As already stated the current format is not fit for purpose.
Q12. Do you agree with our preliminary assessment of the options presented above?	We broadly agree, while noting that the Authority needs to take a pragmatic approach here and not force retailers to go too far back in history for plan/tariff details.
Q13. Are there elements of the existing EIEP14 that could be	<i>Not answered</i>

adapted or strengthened rather than replaced?	
Q14. Are there any other barriers to using EIEP14 that we have not identified?	<i>Not answered</i>
Q15. If option 3 (new modular EIEPs) is pursued, how should we best sequence implementation to ensure deliverability and minimise disruption?	<i>Not answered</i>
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?	Only include plans that still are active (i.e. customers are still on these plans)
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	<i>Not answered</i>

consumers and third-party service providers?	
<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>	Not answered
<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</p>	<p>A unique identifier would be essential. There are multiple pricing iterations of our plans all named the same.</p> <p>Each retailer should have their own unique identifier in their systems. Just use that. If they don't have unique identifiers, they can create them (e.g. might be a combo of product code, date available, or other qualifying factors).</p>

unnecessary compliance costs?	
Q20. Do you have any feedback on how these new protocols could be implemented?	<i>Not answered</i>
Q21. What are the likely implementation costs (systems, processes, resourcing) for your organisation, and how could these be minimised?	Hard to estimate - we'd need to understand what exactly is required. If alignment with the CDR is strong, then this is basically bringing forward this work and costs would have been faced later anyway. If the alignment is poor this would be creating duplication of effort and rework.
Q22. What support, if any, would you find helpful during implementation (eg, technical guidance, test environments)?	Similar to the market monitoring data, conducting workshops/info sessions along the way is helpful.
Q23. What compliance or assurance mechanisms (beyond Code compliance monitoring) would support effective data quality and adherence?	<i>Not answered</i>
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?	Our pricing and data team will be very keen to be involved in helping shape the requirements. The more we are involved early on, the easier the future delivery will be. Also, the Authority should ensure a good data architect/engineer/scientist is involved in specifying the requirements in order to

	avoid some of the ambiguity we've seen in other data requests.
Q25. Are there specific technical standards, platforms, or international practices the Authority should consider in designing API-based access?	<i>Not answered</i>
Q26. Do you have any feedback on the proposed implementation timeline, or additional risks or dependencies we should factor in?	<i>Not answered</i>