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Mark Hughes
Pāua to the People

Submitted via email: consumermobility@ea.govt.nz

Submission on the consultation, *Enabling consumer mobility by improving access to electricity product data*

Pāua to the People welcomes the opportunity to provide input into this consultation, where the Authority is considering changes to standardise how electricity product data is exchanged through an improved suite of Electricity Information Exchange Protocols (EIEPs).

Our responses to the specific consultation questions are attached at the end of the document.

In general, we believe consumer mobility will come when there is a margin for retailers, when multiple trading relationships enable solar mobility and the playing field is adequately level. We note that some of the bigger participants are pulling out of customer acquisition activity as they are losing money, which overall results in decreased mobility.

For comparison and switching activities, for which product data standards are of relevance, we also note:

- Consumer NZ, which provides the comparison and switching service, Powerswitch, had been asking retailers to pay to be listed. Pāua to the People hasn't been listed on Powerswitch for 8 years, but for the benefit of consumers it should be mandatory.
- Comparisons are made on the basis of an entire year, whereas Pāua to the People has customers for short periods, which makes it difficult to compare the value of our service with others in a way that matches how consumers use spot pricing.
- For consumer mobility, it would be most advantageous if anyone can look at the comparison and switching service at any time to work out who is cheapest, however this means additional costs need to be covered for retailers (see margin).

We appreciate the opportunity to provide a new perspective and welcome questions from the Authority on this submission at [REDACTED]

Mark Hughes

Managing Director, Pāua to the People

Submitter	Paua to the People
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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 don't think access to product data will improve consumer mobility until other structural aspects are also fixed, i.e. multiple trading relationships, generator retailer accounting.</p> <p>The changes are only targeting people who already switch, and it is adding cost for small retailers. We acknowledge that it should be done, but note that it needs to be done alongside the other changes mentioned above.</p> <p>Making a mechanism which is simple still needs to benefit the consumer. In contrast, comparison websites do what they are paid to do, vs deliver value to consumers so should be regulated.</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?	<p>Retailers should not own consumption data. Customers own it and it should be managed on their behalf by a party who is paid to manage data. This shouldn't be the retailer; it should be a data company receiving data from MEPs. This should happen sooner rather than later, as it will have a big impact on innovation.</p>
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>Creating these standards is not about the CDR, but about what works for the industry to be efficient. It should be an operational standard rather than in line what customers ask for. It should be consistent and made easy.</p> <p>It shouldn't be part of CDR or only noted in the CDR after they have been set.</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?	Refer to response to question 3.
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?	-
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, we need a standard which works across the industry.
Q7. Have you encountered specific operational or compliance barriers when trying to access or share product data?	We note that spot pricing isn’t well catered for. This is especially true where retailers are continuing to use non-half hourly data despite having access to HHR data.
Q8. What are the most significant friction points for consumers when comparing and switching electricity plans today?	In practice, electricity plans are designed by many retailers to be hard to compare. This makes it difficult for a consumer to understand what they are trading off between different tariffs, and they also don’t understand what tariff they are on.
Q9. How would better access to standardised and on-demand product data improve outcomes for consumers and/or your organisation?	<p>Unique identifiers would be preferable, and should be standardised, like an ICP. They should be printed on every invoice.</p> <p>These could be allocated by adding a counter, essentially automating/simplifying how they are created.</p> <p>Trying to standardise product data is going to constrain innovation; innovation needs to be</p>

	<p>balanced with the desire for on-demand data.</p> <p>It would be helpful to provide standard names for comparable plans/tariffs, as this would limit the volume of information which is effectively the same. More can be added as needed for innovation.</p>
Q10. Do you agree with the proposed assessment criteria (effectiveness, efficiency, feasibility, and strategic alignment)? Are there other criteria we should consider?	<p>The current criteria is not particular useful for consumer mobility. Having a list of things that a tariff should deliver is more useful than a criteria – which would add cost unnecessarily.</p> <p>Taking Electric Kiwi as an example, they continue to create new tariffs. One of the new criteria could be when the tariff was set up vs grandfathered to help with comparison. Supplying customers with a unique id for their tariff will make it very clear which tariff they are on.</p>
Q11. Do you have a view on which option (status quo, regulated EIEP14, new modular EIEPs) would deliver the most benefit and why?	A standard for transferring a customer's usage data so that they can use it would be useful. It needs to come from the right party (i.e., the MEP) such that it is always in alignment (i.e., one source of truth even when there are multiple different retailers).
Q12. Do you agree with our preliminary assessment of the options presented above?	-
Q13. Are there elements of the existing EIEP14 that could be adapted or strengthened rather than replaced?	-
Q14. Are there any other barriers to using EIEP14 that we have not identified?	-
Q15. If option 3 (new modular EIEPs) is pursued, how should we best sequence	-

implementation to ensure deliverability and minimise disruption?	
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?	-
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?	-
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?	Practical limitations are all related to the cost and the hassle of providing of the data. If the data was coming from a single source, rather than a retailer, it would be easier. We note that making it too easy to make requests will result in continued/repeated requests, and retailer costs associated with this need to be covered.
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?	
Q20. Do you have any feedback on how these new protocols could be implemented?	-
Q21. What are the likely implementation costs (systems, processes, resourcing) for your organisation, and how could these be minimised?	-
Q22. What support, if any, would you find helpful during implementation (eg, technical guidance, test environments)?	-
Q23. What compliance or assurance mechanisms (beyond Code compliance monitoring) would support effective data quality and adherence?	-
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?	-
Q25. Are there specific technical standards, platforms, or international practices the Authority should consider in designing API-based access?	-
Q26. Do you have any feedback on the proposed implementation timeline, or additional risks or dependencies we should factor in?	-

About Pāua to the People

Pāua to the People is a small independent electricity retailer supplying New Zealand homes for over a decade, with the goal to help New Zealanders to keep their lights on and homes warm. In addition to retailing electricity directly to customers, Pāua to the People have recently expanded their operations to provide electricity retailer support services and bespoke electricity services.

Pāua to the People has applied to the Power Innovation Pathway, the Authority's open front door for innovators to access regulatory advice and support to accelerate the introduction of new products and services to market which can deliver significant consumer benefits.

This submission has been completed at the request of the Power Innovation Pathway Manager to ensure that more innovator perspectives are incorporated into the Authority's consultations and regulatory functions.