Appendix A Format for submissions

Submitter	Revolve Energy

Questions	Comments
Q1. Do you agree that improving access to product data will support consumer mobility through enabling innovation and informed choice?	100% agree.
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?	Time of use electricity plans will be increasingly important as they allow customers to access lower tariffs. Using DER to avoid the higher tariffs. In parallel to this change, there must also be a change to allow customers to share their electricity use data via API in nearly instantly. The current process is unworkable for automated tools.
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.
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?	In the future software is likely to be employed by consumers to manage their DER to reduce exposure to high prices and access lower prices. The software will need to know what the customers retail tariff is to be able to achieve this. These standards should extent to allowing consumers to share their current tariff with their software.
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	Insufficient time available to be able to understand the details to be able to respond.

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
Q7. Have you encountered specific operational or compliance barriers when trying to access or share product data?	We have never been able to access product data in suitable and complete format.
Q8. What are the most significant friction points for consumers when comparing and switching electricity plans today?	1) Very difficult to find out what the offers are from each retailer. 2) Very difficult to assess which is the lost cost plan given their usage patten. 3) Hard to access their use data. 4) No robust and modern tools to help them. 5) Requires technical know how 6) Requires significant time.
Q9. How would better access to standardised and on-demand product data improve outcomes for consumers and/or your organisation?	Providing data via API (tariffs and consumption data) would allow tools to be provided to customers that can analyse their usage against different tariffs and advise the best tariff. It would also allow the same or similar tools to advise on the benefit of investing in solar, batteries etc.
Q10. Do you agree with the proposed assessment criteria (effectiveness, efficiency, feasibility, and strategic alignment)? Are there other criteria we should consider?	1) Fit for purpose. 2) Suitable for likely future needs.
Q11. Do you have a view on which option (status quo, regulated EIEP14, new	Option 1 and 2 are not suitable to achieve the objectives.

modular EIEPs) would deliver the most benefit and why?	The only workable option is option 3, APIs. Which I think is what you mean by modular EIEPs.
Q12. Do you agree with our preliminary assessment of the options presented above?	Yes. It is not clear anywhere in the proposal who would host the API. Would service providers have to access APIs with each retailer, or would there be a central hosted API (e.g. by the EA) where all plans can be access through a single provider?
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?	Not valuable in most use cases.
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	No.

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?	It would be reasonable to limit the number of requests with in a certain period of time. However this could be a high number given the low cost of serving the data. It would be preferable to go fast, rather than have any interim measures. A solution could be to establish a central provider of tariff plans quickly. Then have a period of time for retailers to submit all their plans to the provider. After a deadline all new plans should be made available as soon as they are available to customers.
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?	This is essential.
Q20. Do you have any feedback on how these new protocols could be implemented?	Very quickly. The API should be centrally hosted to avoid agents having to access APIs at each retailer. This would also help to avoid replication and inefficiency with each retailer hosting the data separately.
Q21. What are the likely implementation costs (systems, processes, resourcing) for	It would be more expensive for uses of the APIs if they have to connect to multiple

your organisation, and how could these be minimised?	retailers to access the plans available in the market.
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?	Potentially uses of the APIs. E.g. software vendors, including those providing tools for assessing the viability of installing solar PV and BESS.
Q25. Are there specific technical standards, platforms, or international practices the Authority should consider in designing API-based access?	A central managed API would be preferable. What is not clear in the proposal is how you will determine who has the right to access the data on the customers current plan. The same problem applies to access a customers consumption data, so could perhaps be solved together.
Q26. Do you have any feedback on the proposed implementation timeline, or additional risks or dependencies we should factor in?	This is urgently needed. Providing the data via API within 12 months is a good deadline.