

## Appendix A Format for submissions

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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?	Yes
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>The benefits appear to primarily focus on third party authorised agents and largely ignore consumers who wish to do their own analysis of pricing options available from the various retailers.</p> <p>When reviewing options consumers require access to all electricity plans available to existing customers [from their current retailer] and to new customers [from all retailers], for all metering configurations and not just the current metering configuration at the ICP.</p> <p>For example, I recently was asked to provide a recommendation for a family member moving house. I looked at plans available from 5 major retailers via their websites and entering the relevant address, 4 of 5 retailers offered Day/Night pricing plans only and the other retailer offered Peak/Off Peak pricing plan only with Off Peak all weekend. I concluded the existing metering configuration set-up for the previous owner was Day/Night.</p> <p>I checked with Wellington Electricity and was advised their default pricing to retailers</p>

is Peak/Off Peak (Off Peak including all weekend).

I would have expected all retailers to offer Peak/Off Peak pricing, and for generally available pricing plans to include all metering configurations as it is my understanding a customer is entitled to request a metering configuration change so they can access all pricing plan options (including non-TOU).

Accordingly, for the property I was asked to advise on I should have been able to access pricing plans for Peak/Off-Peak, Day/Night, Uncontrolled/Controlled, and Inclusive metering configurations – for Low User and Standard User consumers. The only retailer to provide all the pricing options was the retailer that offered Peak/Off-Peak as the default while also providing a full pricing schedule which included all other pricing plan options subject to the appropriate metering configuration being available (reconfigured if necessary).

EIEP14A will provide all the information required by consumers doing their own analysis, but equally could be provided more simply by the retailer providing a full pricing schedule which includes all pricing plan options. EIEP14A needs to include the actual hours for each pricing component for TOU pricing plans (e.g. Peak of Off-Peak hours and days, Day and Night hours and days).

My view is EIEP14B would not add value and should be discarded as it would add unnecessary complexity to the development and time if mandated.

	EIEP14C would be most useful to third party authorised agents, while for consumers it would be less useful as the consumer already knows their current plan. However, it would be useful if it includes the existing metering configuration (register contents codes and associated descriptions, hours of availability).
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?	
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?	
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?	
Q7. Have you encountered specific operational or compliance barriers when trying to access or share product data?	Yes

<p>Q8. What are the most significant friction points for consumers when comparing and switching electricity plans today?</p>	<p>Only being provided with pricing plans via the retailer's website that reflects existing metering configuration (e.g. Day/Night) when other pricing plan options should also be made available (e.g. Peak/Off-Peak) even if it requires a change to the metering configuration for retailer billing purposes (e.g. from Day/Night to Uncontrolled/Controlled or Inclusive).</p> <p>Lack of information regarding details of pricing plans offered – e.g. Day/Night hours and days, Peak/Off-Peak hours and days – instead requiring a consumer to drill into the retailer's website to try and find the information.</p> <p>Retailer website requiring a consumer to start the switching or sign-on process when all the consumer initially wants is to obtain pricing plans available for a particular network area (e.g. Wellington) for all metering configurations, and only entering the switching or sign-on process once the consumer has determined their preferred retailer pricing plan option.</p> <p>Pricing plans should be available for both open and fixed terms, for some websites the default is open term.</p>
<p>Q9. How would better access to standardised and on-demand product data improve outcomes for consumers and/or your organisation?</p>	<p>Enable consumers (or their agents) to more readily access pricing plan and retailer options to make the best decision for their circumstances and usage pattern.</p>
<p>Q10. Do you agree with the proposed assessment criteria (effectiveness, efficiency, feasibility, and strategic alignment)? Are there other criteria we should consider?</p>	<p>Yes</p>

Q11. Do you have a view on which option (status quo, regulated EIEP14, new modular EIEPs) would deliver the most benefit and why?	Regulated EIEP14A and EIEP14C only, discard EIEP14B proposal. Refer to answer to Q2 above.
Q12. Do you agree with our preliminary assessment of the options presented above?	Yes, although appears to focus more on third party digital access over less sophisticated consumer access.
Q13. Are there elements of the existing EIEP14 that could be adapted or strengthened rather than replaced?	Refer to answer to Q2 above. It will not be until the detail is worked through that it will become apparent that the proposed EIEP14A and EIEP14C will deliver all the information required by both third parties and consumers (who wish to do their own analysis).
Q14. Are there any other barriers to using EIEP14 that we have not identified?	Refer to answer to Q13 above.
Q15. If option 3 (new modular EIEPs) is pursued, how should we best sequence implementation to ensure deliverability and minimise disruption?	EIEP14A first, then EIEP14C (as the information in EIEP14C should mostly be available from the consumer's bill).
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. I don't see any useful purpose in including EIEP14B as historic offers capturing all current and legacy plans look backwards rather than forwards and will not serve a useful purpose as the customer's existing pricing plan available from an existing bill or EIEP14C (for switching) or ICPs existing metering configuration which should be made available from EIEP14C (for move-ins) is the starting point.
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?)	Only publicly available pricing plans available for existing customers (potentially switching from the current plan to an alternative plan with the existing retailer) and new customers (switching from another retailer or move-in) should be included in EIEP14A.



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?	
<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>Q.18b. What additional provisions are needed to maintain data continuity during retailer exits, mergers, or other significant business changes?</p>	No comment
<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 unnecessary compliance costs?</p>	<p>Yes</p> <p>Unique identifier should be designed similar to distributor pricing codes and associated descriptions.</p>
Q20. Do you have any feedback on how these new protocols could be implemented?	No
Q21. What are the likely implementation costs (systems, processes, resourcing) for your organisation, and how could these be minimised?	Not applicable as consumer only

Q22. What support, if any, would you find helpful during implementation (eg, technical guidance, test environments)?	Not applicable
Q23. What compliance or assurance mechanisms (beyond Code compliance monitoring) would support effective data quality and adherence?	Testing to ensure the EIEP14 files deliver the required information accurately and completely
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?	<p>I would be happy to be involved in co-designing the new protocols from the perspective of a consumer with significant industry experience and knowledge.</p> <p>The authority should include both third party and consumer representation, subject to the consumer representation having the appropriate experience and understanding of electricity pricing plans.</p>
Q25. Are there specific technical standards, platforms, or international practices the Authority should consider in designing API-based access?	No comment
Q26. Do you have any feedback on the proposed implementation timeline, or additional risks or dependencies we should factor in?	No comment