

# **Proposed Code amendments to improve access to electricity product data**

Consultation paper

8 October 2025

## Executive summary

### **Affordable, reliable, and accessible electricity for all**

Consumers need electricity services that are affordable, reliable, and accessible to all. Right now, too many New Zealanders are paying more than they should. Bills are confusing, plans are hard to compare, and consumers are missing out on the full benefits of competition and innovation.

The Electricity Authority Te Mana Hiko is working towards a future where consumers can confidently compare, switch, customise and automate their electricity services in ways that suit their needs.

### **An early big step: regulated product data standards**

One of the foundations for this future is unlocking access to accurate, comprehensive, and timely electricity data, including standardised plan and tariff information.

We propose to standardise plan and tariff information through regulated data protocols. This would ensure every consumer, and third parties acting on their behalf, can access a fair and consistent view of their options.

We recently consulted replacing the current voluntary Electricity Information Exchange Protocol 14 (EIEP14) with a regulated, modular suite of new protocols. Almost all submitters supported our preferred option to create a modular set of EIEP14s, though many raised concerns about the scope of EIEP14B (the protocol for requesting all retail tariff plans offered by a retailer).

In light of consultation feedback, the Authority has decided to move forward with a redesigned suite of EIEP14s to standardise the exchange of electricity product data.

We are also proposing to introduce a new system requiring all retail electricity plans to be associated with a unique product identifier code. This would make all plans distinguishable, easily identifiable, and accessible to consumers and third parties on demand.

We propose to amend the Code to:

- extend the existing requirement on retailers to provide information on generally available retail tariffs to also provide information on 'legacy' plans (which although active are not generally available) on request
- introduce a unique product identifier system that requires retailers to apply a unique code to every retail plan they offer
- require retailers to provide the applicable product identifier codes to consumers or agents upon request, for the consumer's ICP
- empower the Authority to prescribe an Electricity Information Exchange Protocol (EIEP) for the provision of electricity product information through the Electricity Information Exchange system.

### **How these proposals fit within our wider consumer mobility programme**

Improving access to product data is a key part of our broader consumer mobility work programme – reinforcing initiatives designed to improve choice, control and value for consumers across the electricity sector.

Key projects that could enhance the benefits of these product data proposals include:

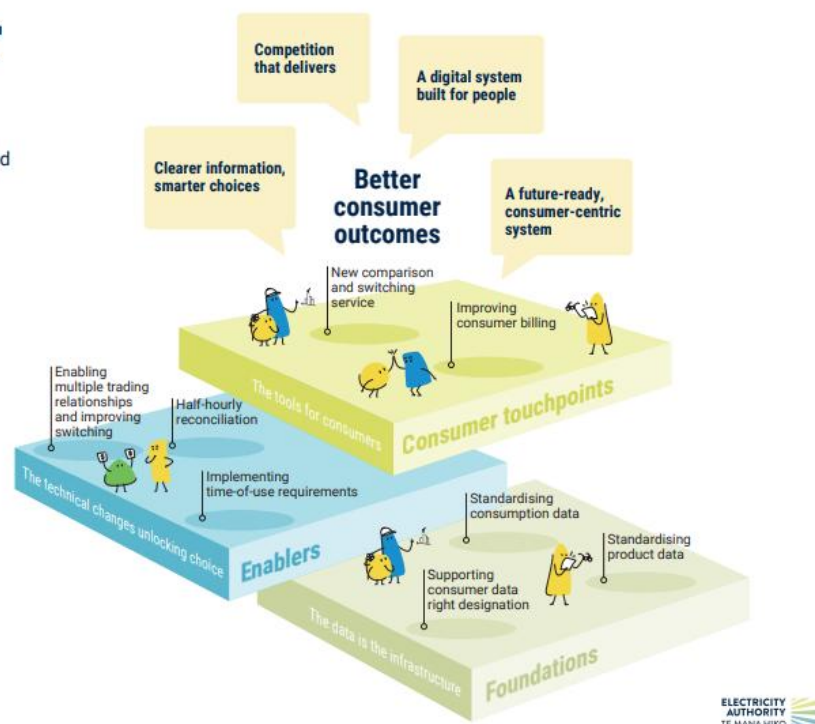
- **New comparison and switching service** – The Authority is funding a new comparison and switching service to make it easier for consumers to find the best deal for their circumstances (new service due to begin in early 2026).
- **Enabling multiple trader relationships and improved switching** – Proposing changes to enable consumers to choose different retailers to buy from or sell to for electricity consumption and generation (consultation closed in July 2025). We are also considering improvements to the switching process to make it easier and more accurate.
- **Improving consumer billing** – Considering options to provide better information to consumers and encourage them to compare and switch, including standardised content, better plan prompt, and limit back bills. [We are consulting on proposals to improve electricity billing in New Zealand.](#)<sup>1</sup>

Together, these proposals would make comparison and switching services more accurate and effective, laying the foundations for future innovations – including AI-driven tools, smart home systems and new digital services that help consumers save money and manage their energy use.

The relationship between these proposals and other consumer mobility related projects is illustrated in the diagram below:

## Consumer Mobility

More choice, more control and better value for customers



Together, these initiatives will deliver a modern, digital and consumer-centric electricity system. Consumers will get the best deal on their electricity because the system will be designed to make it easy and accessible for them to do so.

**Have your say**

<sup>1</sup> [Improving electricity billing in New Zealand consultation](#)

This paper provides our response to the feedback received on our initial options paper<sup>2</sup> and includes a follow-up consultation on the proposed Code amendments required to operationalise the new suite of regulated EIEPs, and to require retailers to create product identifier codes.

### **Next steps**

Consultation is now open and closes at 5 pm on Tuesday 18 November 2025. After reviewing submissions, the Authority will consider the feedback received and will further engage with the industry to co-design the proposed new EIEP14s. We intend to consult on the finalised proposed EIEP14s in early 2026.

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<sup>2</sup> [Enabling consumer mobility by improving access to electricity product data](#)

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# 1 What you need to know to make a submission

- 1.1. The purpose of this paper is to seek feedback from interested parties on the proposed Code amendment to:
- (a) extend the existing requirement on retailers to provide information on generally available retail tariffs to include product identifier codes for each tariff and information on legacy plans, upon request
  - (b) empower the Authority to prescribe an Electricity Information Exchange Protocol (EIEP) for the provision of electricity product information through the Electricity Information Exchange (EIE) system
  - (c) require retailers to apply a unique product identifier code to every retail tariff plan they offer
  - (d) require retailers to provide the applicable product identifier code to consumers or their agents upon request, for the consumer's ICP.
- 1.2. Section 39(1)(c) of the Act requires the Authority to consult on any proposed amendment to the Code and corresponding regulatory statement. Section 39(2) provides that the regulatory statement must include a statement of the objectives of the proposed amendment, an evaluation of the costs and benefits of the proposed amendment, and an evaluation of alternative means of achieving the objectives of the proposed amendment. The regulatory statement is set out in part seven of this paper.

## How to make a submission

- 1.3. Our preference is to receive submissions via a Word document in the format shown in Appendix B. Submissions should be emailed to [consumer.mobility@ea.govt.nz](mailto:consumer.mobility@ea.govt.nz) with "Consultation Paper - Code amendments to improve access to electricity product data" in the subject line.
- 1.4. If you cannot send your submission electronically, please contact us ([consumer.mobility@ea.govt.nz](mailto:consumer.mobility@ea.govt.nz) or 04 460 8860) to discuss alternative arrangements.
- 1.5. Please note we intend to publish all submissions we receive. If you consider that we should not publish any part of your submission, please:
- (a) indicate which part should not be published,
  - (b) explain why you consider we should not publish that part, and
  - (c) provide a version of your submission that the Authority can publish (if we agree not to publish your full submission).
- 1.6. If you indicate part of your submission should not be published, we will discuss this with you before deciding whether to not publish that part of your submission.
- 1.7. However, please note that all submissions received by the Authority, including any parts that the Authority does not publish, can be requested under the Official Information Act 1982. This means the Authority would be required to release material not published unless good reason existed under the Official Information Act to withhold it. The Authority would normally consult with you before releasing any material that you said should not be published.

- 1.8. Please also note that we may also share submissions (including any parts that the Authority does not publish) with other public sector organisations, the gas industry body or an overseas regulator in accordance with section 47A of the Electricity Industry Act 2010. We would only do so if the submissions could assist that organisation in the performance of its functions and if it was satisfied that there are appropriate protections in place for maintaining the confidentiality of anything provided.

### **When to make a submission**

- 1.9. Please deliver your submission by **5pm on Tuesday 18 November 2025**.
- 1.10. Authority staff will acknowledge receipt of all submissions electronically. Please contact the Authority at [consumer.mobility@ea.govt.nz](mailto:consumer.mobility@ea.govt.nz) or 04 460 8860 if you do not receive electronic acknowledgement of your submission within two business days.

## **2. Improving consumer mobility through better access to data**

### **Consumer mobility: empowering the consumer of the future**

- 2.1. We are working to realise a future where all consumers – regardless of digital literacy or energy knowledge – can confidently navigate the electricity system. In this future, consumers can compare, switch, automate, and participate in new energy models with ease, lowering costs and improving choice.
- 2.2. Data and digital tools will play a key role in this future. Artificial intelligence, data-sharing standards, and a potential Consumer Data Right (CDR) will enable innovative services.
- 2.3. Compared to this future-state, the current lack of a standardised and reliable way for third-party service providers to obtain electricity product data on demand is constraining innovation and limiting consumer choice.

## **3. Why product data matters: enabling innovation and improving outcomes for consumers**

- 3.1. Currently, the Code's provisions on sharing information only refer to "generally available tariffs", where information on "legacy" plans (plans that are no longer marketed, but still have customers) and consistent product information would also be valuable.
- 3.2. We have consistently heard from innovators and third-party service providers that greater access to accurate, timely and standardised electricity data would support innovation in the development of innovative advisory tools and services. These include comparison and switching platforms, tools to consider the value of installing solar generation in the home, and services that recommend electricity plans to optimise energy use and cost.
- 3.3. Promoting the development of accurate and effective advisory tools and services is vital to ensuring consumers are provided with the right information at the right time, through the right channels.

- 3.4. Expanding the set of information that must be made available and standardising how electricity product data is exchanged will help simplify the way consumers engage with the market, reduce complexity and increase confidence in decision-making. This drives more active consumer participation which in turn increases competitive pressures on the retail electricity market, leading to downwards pressure on pricing and promoting innovation in products and services.

### **Alignment with our objectives**

- 3.5. These proposals support our main statutory objective under section 15 of the Act: to promote competition in, reliable supply by, and the efficient operation of the electricity industry for the long-term benefit of consumers. It also aligns with our additional statutory objective under the Act: “to protect the interests of domestic consumers and small business consumers in relation to the supply of electricity to those consumers”.
- 3.6. These proposals are also consistent with our strategic outcomes of supporting effective competition and market transparency to deliver greater affordability for consumers<sup>3</sup>, and with the October 2024 Statement of Government Policy to the Electricity Authority<sup>4</sup>, particularly for competition, so that “household and business consumers can make meaningful choices between competing suppliers and technologies”.
- 3.7. This proposal is part of the Authority’s plans to drive digitalisation across the electricity system to give consumers better tools, more personalised services and clearer information to support confident decision-making.<sup>5</sup>

### **Alignment with the progression of a potential CDR for the electricity sector**

- 3.8. These proposals are also closely aligned to a potential designation of the electricity industry under the Consumer Data Right Regime (CDR), being progressed by Ministry of Business, Innovation and Employment (MBIE).
- 3.9. The Customer and Product Data Act 2025 (CPD Act) establishes an economy-wide framework for automated, real-time exchange of information between data holders, customers and accredited requestors, ensuring privacy and security safeguards are met. Standards for real-time electricity data exchange will be part of the

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<sup>3</sup> Refer to the Electricity Authority’s Statement of Intent 2024-2028:  
[https://www.ea.govt.nz/documents/5430/Statement\\_of\\_intent\\_2024.28.pdf](https://www.ea.govt.nz/documents/5430/Statement_of_intent_2024.28.pdf)

<sup>4</sup> Refer to the Statement of Government Policy to the Electricity Authority under section 17 of the Electricity Industry Act 2010: <https://www.beehive.govt.nz/sites/default/files/2024-10/Government%20Policy%20Statement%20on%20Electricity%20-%20October%202024.pdf>

<sup>5</sup> [Our future is digital](#) | [Our consultations](#) | [Our projects](#) | [Electricity Authority](#)

implementation of any potential electricity sector CDR designation, particularly through application programming interfaces (APIs).

- 3.10. By progressing this work now, we are preparing the sector for a smooth transition into a potential electricity CDR. We are working closely with MBIE to ensure our work is aligned so that product data standards both serve today's market and support tomorrow's CDR - should the electricity sector be designated.
- 3.11. The diagram below demonstrates the Authority's view on how its wider data-driven work programme would fit within, and contribute to, a future regime for electricity. The proposals outlined in this paper specifically refer to point 8 below.

#### **Diagram 1: How the Authority's work programme aligns with a potential electricity CDR**

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##### **Customer and Product Data Act 2025 – MBIE**

- Security and privacy safeguards – consumer authorisations, covering interactions with the Privacy Act 2020
- Designation process is sector-by-sector via regulations

##### **Electricity designation (regulations specific for sector) – led by MBIE, supported by the Electricity Authority**

- Prescribe categories of data holder, what constitutes product and consumer data, and action initiation
- Mechanisms for establishing consent and accreditation
- Instantaneous transmission via Application Programme Interface (API)
- Fees framework

##### **Data standards – led by EA, supported by MBIE**

- Set obligations for participants in relation to data holding and provision
- Electricity Industry Exchange Protocols (EIEPs) enable standardised, on-demand exchange of data between participants.
- Enables consumers (and their agents) to access their consumption data from their retailer, including in standardised formats.

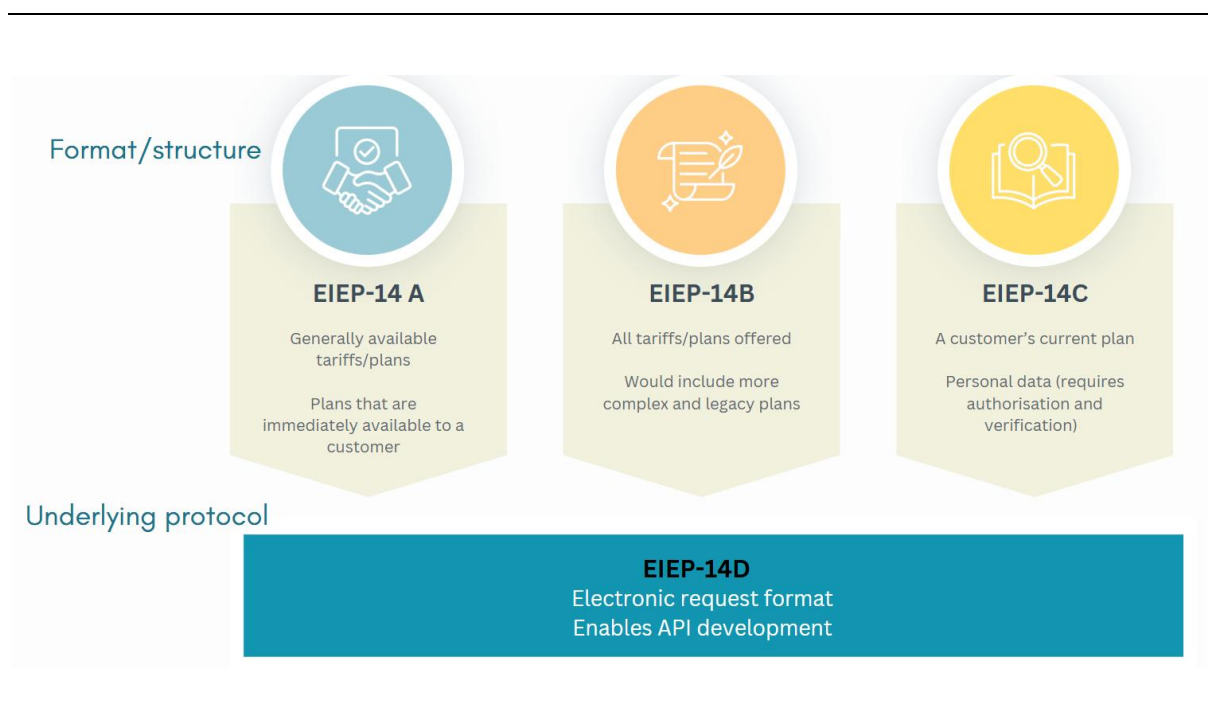
## **4. We consulted on a proposal to improve access to product data**

### **The Authority proposed a modular set of EIEPs to standardise product data**

- 4.1. In July 2025, we released the consultation paper *Enabling consumer mobility by improving access to electricity product data*. We sought feedback on our proposal to create a regulated standard process for the exchange of electricity product and tariff information.

- 4.2. Our preferred option presented in that paper was to redesign and regulate the existing Electricity Information Exchange Protocol 14 (EIEP14) as set out in diagram 1.
- 4.3. The proposal was to create a modular suite of four regulated protocols under EIEP14, modelled on EIEP13 (which relates to requests for a consumer's individual consumption data) to replace the existing voluntary EIEP14.

**Diagram 1: Visualisation of our preferred option**



## Feedback from submissions

- 4.4. We received 20 submissions to the consultation paper from a range of interested parties, including gentailers (generation-retailers), independent retailers, third-party data users, industry representatives (particularly from the solar industry), and individual consumers. These submissions are available on our website.<sup>6</sup>
- 4.5. The feedback we received on key issues is summarised below. While all submissions have been considered as part of the Authority's process, for practical reasons the summaries are not exhaustive and necessarily compress the information provided in submissions. Please refer to the individual submissions on our website for a full account of submitters' views.<sup>7</sup>
- 4.6. We also discussed the feedback received to the consultation with the Authority's Switch and Data Formats Group (SDFG) and sought feedback on how the proposal could change as a result of the feedback we received. The feedback from the SDFG is discussed further below.
- 4.7. Having considered these submissions and the advice of the SDFG, we are now seeking stakeholder views on a proposed amendment to the Code to enable the

<sup>6</sup> [Enabling consumer mobility by improving access to electricity product data | Our consultations | Our projects | Electricity Authority](#)

<sup>7</sup> Ibid.

Authority to create standards for the exchange of electricity product data through EIEPs. This proposal is discussed further below in section 6.

## **Key themes arising from submissions**

### **Broad support for the Authority's proposed option**

- 4.8. Almost all submitters supported our preferred option to create a modular set of EIEP14s. Those who supported the proposal were of the view that this approach would enable better access to product and tariff data in the most effective way, while also aligning with broader CDR requirements.
- 4.9. Supporters considered the proposal provided comprehensive coverage of plan types, enabled secure standardised and on-demand data exchange, and addressed current gaps in timeliness, consistency and scope that improved comparability in a way that the status quo cannot achieve.
- 4.10. Several submitters who supported the option to create a modular set of EIEP14s, also raised concerns with certain aspects of the proposal. These were primarily related to the scope of one protocol, EIEP14B. This is discussed further below.
- 4.11. Two submitters did not support the option at all. Energy Link proposed an entirely different approach to managing electricity product data. Paua to the People said that the proposal would not improve consumer mobility until other structural issues of the retail electricity market were addressed (e.g., wholesale market reform).

### **Submitters questioned the scope of product data captured by one of the proposed EIEP14s**

- 4.12. The primary criticism of the proposed approach concerned the proposed EIEP14B – the proposed protocol for requesting all retail tariff plans offered by a retailer.
- 4.13. Those who questioned the scope of this proposal included ERGANZ, gentailers, and individuals, who argued that EIEP14B should be discarded. They cited the disproportionate compliance costs compared to its limited (if any) consumer benefit; due to the sheer volume of data points this would entail. Rather, these submitters suggested an alternative to identifying a customer's current plan that would resolve the issue of customers being on plans that are no longer widely available.
- 4.14. Retailers argued that the scope of the plan information captured by the EIEP14B proposal should only extend to plans that are still active and should exclude historical data and commercial and industrial consumer contracts. This means all plans that are either generally available or plans to which some customers are still contracted but are not available for new customers.
- 4.15. SEANZ echoed this view, noting that if a plan had no relevance to the broader customer base (i.e., it doesn't apply to any customer in New Zealand) then that plan data is irrelevant to consumers and data users.
- 4.16. Even those who supported a broad scope of plans captured by this proposal acknowledged that specialised cases (such as staff discounts and other hyper-specialised deals) do not need to be included, and a common-sense approach is needed.

- 4.17. Some third-party data user submitters did support a wider capture of information, including historical plans. Consumer NZ argued that limiting the data set would create gaps in comparison tools and would risk consumers not being able to identify their plan if they were on a plan that was no longer marketed.
- 4.18. One data user (Cortexo) argued that even if a plan did not have active customers, it should be visible so that the tariff is applied to historic consumption data for the purposes of comparing plans alongside usage. In all these cases, submitters noted that a system for uniquely identifying plans would serve a similar purpose as EIEP14B.

### **Authority's response**

- 4.19. The Authority acknowledges the concerns raised by industry submitters about the burden of this proposal having such a wide scope. The purpose of this wide scope was to enable third party services to obtain information about plans that were currently active (i.e., have customers) but would not be captured within the narrow scope of "generally available".
- 4.20. We agree that keeping the scope of the new EIEPs simple and limited to only necessary information to support consumers is the best approach, and we are amending our proposal so that retailers still need to provide information on generally available plans, but also need to provide information on plans which were once generally available but are no longer generally available, but are still active and supplied to existing customers. We are interested in feedback on this scope of information.
- 4.21. We also acknowledge those submitters who supported a wide scope of information capture. Several submitters who supported the EIEP14B proposal noted that the scope of necessary information was primarily information about active plans, and that historic plan information was for the most part unnecessary.
- 4.22. Our proposed change reflects this feedback. When we design the EIEPs we will take into consideration the information that is necessary to fill these information gaps and aim to facilitate good outcomes for consumers when accessing data about electricity products.

### **Support for unique plan identifier codes**

- 4.23. While not part of the preferred option, the Authority included a specific question in the consultation paper about whether a unique identification code system for retail electricity plans would be beneficial.
- 4.24. Responses to this question were overwhelmingly supportive. Respondents noted that this would support the integration of product data with other data sets and would resolve numerous issues relating to consumer confusion.
- 4.25. For example, some respondents argued product codes are essential to an automated electricity sector and suggested that a unique product identifier code for every electricity plan would address issues in identifying a household's exact current pricing plan (i.e., does the job of EIEP14B).
- 4.26. Respondents also noted that product codes would prevent confusion where retailers use similar branding, ensure accurate matching of data across systems,

and enable consumers and third parties to reliably track changes to plan terms, pricing, or eligibility over time.

- 4.27. Some respondents (EEA, Energy Link) argued that codes should be administered by an independent body using a standardised format applied consistently across all retailers. Others (including Consumer NZ) argued that retailers should be responsible for administering codes based upon agreed industry protocol.
- 4.28. Some respondents suggested certain structures that codes should follow, most of which utilised industry participant codes. Individual submitters suggested these codes should be similar to distribution pricing codes. Octopus suggested that retailers' internal product codes could be utilised – and this was heavily supported by the SDFG.
- 4.29. Only Contact actively opposed this option, preferring the Authority focus on ensuring plan metadata was consistent and resolved complexity through focusing on complementary data standards. However, in subsequent conversation Contact expressed support for the proposal, but also expressed concern about implementation given the vast number of electricity plans active on the market.

### **Authority's response**

- 4.30. The Authority acknowledges the support for product identifier codes. While the Authority did not initially suggest product identifier codes as part of its initial proposal, the feedback received gives us a clear indication that we should take this proposal forward.
- 4.31. We are now including product identifier codes as part of our proposal to improve access to electricity product data, including introducing Code requiring retailers to assign product identifier codes to their electricity retail plans.
- 4.32. We acknowledge alternative views about product identifier codes. Much of the opposition to product identifier codes was related to concerns about its implementation, particularly regarding how product identifier codes would apply to different pricing levels of similar plans, rather than the merits of its benefit to consumers. If this Code amendment proceeds, we would work through those concerns as part of a next phase of consultation with industry to further develop product identifier codes.

### **Support for a phased approach**

- 4.33. Most submitters supported a phased approach to developing (and implementing) the EIEP14s.
- 4.34. The most supported approach was to begin with developing a high-quality EIEP14A as the fundamental basis for creating a data standard and then progress to the additional protocols as need arose. This sequencing was seen as the least disruptive and the most feasible approach which would result in accessible data standards being in place (and therefore benefiting innovators and consumers) with the least disruption and delay.
- 4.35. Data-user submitters noted that the implementation timeframe should consider that changes to IT systems (which would be required to implement the new standards) will require iterative testing and may not follow a linear process.

- 4.36. Submitters observed that staging allows the Authority to deliver early consumer value, while giving industry time to co-design, test, and refine systems. Many noted that this sequencing would also allow the Authority to align later phases with MBIE's work on the CDR and the Authority's own product identifier codes proposal, reducing duplication and ensuring compatibility.
- 4.37. Retailer submitters asked that the timeline for implementing new protocols should remain flexible and should be mindful of any potential dependencies on the potential designation of the electricity industry under a CDR designation process. Some suggested embedding a grace period in the implementation timeframe where breaches would be forgiven.
- 4.38. Other submitters (mostly consumers and data-users) noted that implementation is urgent and should be prioritised. Several submitters noted overlaps with proposed changes to standards for consumption data, particularly around accreditation and consent for access, and suggest that the two could be solved together if implemented together.
- 4.39. A smaller number of submitters cautioned that implementing multiple protocols simultaneously would create significant risks, including inconsistent implementation across retailers, higher compliance costs and potential delays to consumer benefits.

### **Authority's response**

- 4.40. The Authority's intention is to allow sufficient time to develop these proposals, balanced against a desire to have these data standards implemented in a timely manner to maximise the benefit to consumers.
- 4.41. While the Authority acknowledges that allowing significant time to develop, test and implement these proposals iteratively would be beneficial, we are aware of the growing need to improve access to data to improve the rapidly digitising electricity industry and enable innovation to flourish.
- 4.42. The Authority agrees that phasing the design of these standards would be beneficial, given the change in our proposal to create a single data standard for requesting available plan information.
- 4.43. As such, we are proposing that our iterative design of these standards focuses on designing the new EIEP14A. This allows us to focus our efforts on the data standards that will be the most significant for improving access to electricity product data. This in turn will accelerate when consumers (through more empowered innovators) see benefits from new data standards.
- 4.44. This will also accelerate when foundational data standards can be established for a potential electricity CDR.

### **Other themes raised in submissions**

#### **A central repository of data**

- 4.45. Several submitters suggested that the Authority establish a single, centralised repository of tariff plans. Those who raised this idea claimed that a 'tariff server' would act as a universal source of truth to all current retail offers, linked to a unique identifier for each plan. One submitter (Energy Link) suggested this proposal as a

replacement of the Authority's proposed EIEPs, whereas others who raised it did so in addition to the proposed EIEPs.

- 4.46. Proponents argued that this repository would reduce retailer burden by requiring a plan to be created and registered only once, while also giving consumers, innovators and brokers a single source of truth for comparison. They noted that centralisation could support advanced services such as automated bill checking, proactive notifications of cheaper plans, and real-time forecasting of energy costs.
- 4.47. While there was strong support in this approach, submitters also recognised possible costs and complexity. A centralised repository would require strong governance, consistent access rules, and significant investment in infrastructure and security. Some parties expressed concern that centralisation could add complexity or create a single point of failure, and that retailer-led exchange formats (such as EIEPs) may be more proportionate, at least in the short term.

#### **Authority's response**

- 4.48. We note the feedback received on this issue, including the benefits as articulated by submitters. The Authority has not considered a centralised data repository as part of its proposal to improve access to electricity product data at this stage. We expect to consider this further in our digitalisation work.
- 4.49. We are working with MBIE on the regulations to support a designation under the CDR, including options for managing the options for accreditation and consent, and we will consider centralised and decentralised models of data storage as part of this process.
- 4.50. We do not consider this to be a dependency for the proposed Code amendment. We also do not believe our proposal would conflict with a central data repository, as these standards could easily be adopted to support such a proposal. We will therefore continue to develop EIEP14s and will separately assess whether a centralised repository of data would be of benefit.

#### **Consumer friendly design**

- 4.51. Some submitters, including Utilities Disputes and individual consumers, emphasised that the proposed standards were written largely for third-party users, rather than for consumers directly. They noted that consumers also need to be able to understand and use product data in ways that reduce search effort and improve transparency. This was seen as particularly important for disengaged or vulnerable consumers, who often struggle to navigate complex plan information.

#### **Authority's response**

- 4.52. The Authority agrees that data standards must ultimately deliver benefits for consumers. However, we note that one of the purposes of the EIEP14s proposal is that creating standards for product data will allow third party innovators to make this data consumer friendly as part of their business models.
- 4.53. Code amendments to compel retailers to provide product data upon requests (discussed below) would also allow consumers to request information about product data in a prescribed format. We are also consulting on ways to improve billing so

that consumers - either directly or via trusted third parties - have access to clear and consistent product data that makes comparing offers simpler and more reliable.

- 4.54. We are working closely with Daylight, our delivery partner for the Authority-funded comparison and switching platform, to design a next-generation service that is more intuitive, accessible, and provides greater consumer usability. This platform will incorporate plain language, digital accessibility, and an inclusive design, ensuring it works for consumers regardless of their level of digital literacy or energy knowledge.

### **Data quality and assurance**

- 4.55. Several submitters raised concerns about the quality, consistency, and timeliness of data provided under current arrangements. They noted issues such as inconsistent plan definitions, delayed updates, and incomplete coverage of legacy or complex plans. Submitters argued that robust monitoring and assurance mechanisms would be critical for the success of any regulated data exchange standard.

### **Authority's response**

- 4.56. We agree that data quality is as important as data access. For EIEP14A, we will establish clear data dictionaries, field-level validation, and update requirements (for example, requiring updates to be reflected within a defined timeframe after a plan changes).
- 4.57. Over time, we may also consider more formal assurance mechanisms, such as independent audits or automated validation checks, if quality issues arise. This will be included in the consultation on the proposed EIEP14s.

### **Alignment with CDR**

- 4.58. Many submitters supported close alignment with the Consumer Data Right, noting that duplication of effort between the Authority and MBIE would create unnecessary costs and complexity. Alignment was seen as an opportunity to ensure common authentication, consent, and security frameworks across sectors.

### **Authority's response**

- 4.59. We will continue to work closely with MBIE to keep alignment of the development of EIEP14 standards with the CDR framework. This will include harmonising definitions (such as "generally available retail tariff plans" and "product data"), ensuring interoperability of technical standards, and sequencing implementation so that investment made by retailers supports both the Authority's goals and any future CDR obligations.

### **Implementation support for smaller participants**

- 4.60. Several submitters highlighted the costly implementation and technical risks associated with system changes. They also emphasised that smaller retailers face proportionally higher implementation costs, particularly in early phases, emphasising the importance of technical guidance, shared resources, and transitional measures to ensure all participants can comply.

## Authority's response

- 4.61. We recognise the need to support smaller participants so that regulatory obligations do not create barriers to competition. Alongside the development of EIEP14A, we would explore opportunities to provide guidance tools, testing environments, and other supports as necessary. These would reduce bespoke development costs and support smaller participants to meet requirements in a proportionate way.

## Feedback from the Switch and Data Formats Group

- 4.62. On 26 August 2025, the Authority consulted with the Switch and Data Formats Group (SDFG) to discuss the feedback received to the consultation paper.<sup>8</sup> We sought the SDFG's views on how the proposal might be progressed given the feedback received.

- 4.63. The SDFG's feedback was:

### Regarding proposed suite of EIEP14s

- (a) "Historic plans" (i.e., retail plans that did once exist but no longer have any active customers) should not be captured. "Legacy plans" (those that were previously generally available, but are no longer, and still have active customers) should be captured.
- (b) If the purpose of the proposed EIEP14B is to identify the difference between plans that are actively marketed and those that were marketed previously and customers are still currently on, this could be achieved as a subset of an expanded EIEP14A – with a flag for example.
- (c) It is difficult to find a middle ground between providing data in a consumer-friendly manner and also providing access to all necessary product data. While targeting the solution to benefit most consumers is reasonable, there was acknowledgement that EIEP14s should be focussed on providing all the necessary backend data, and that third party services could present this to consumers in a digestible manner.
- (d) Support for a phased approach to development, testing, and implementing the new standards.

### Regarding product identification codes

- (e) Product identifier codes could use retailers' existing internal product codes, with the addition of some logic to establish how unique IDs should work, be administered, and be implemented.
- (f) An addition of a retailer's participant code should negate any potential for overlapping with other retailers' codes that are the same
- (g) If product Codes are made accessible to requestors, access to a person's current product Code would need to account for situations where a customer is on a unique plan that no other customer has. Visibility of this data by other

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<sup>8</sup> The Switch and Data Formats Group reviews and provides advice on the switching processes and exchanges of information between industry participants to ensure they remain efficient and fit for purpose as the industry evolves. The group is made up of industry representatives with expertise in the switching, reconciliation, information exchange and communication processes. [Switch and Data Formats Group | Electricity Authority](#)

retailers could introduce competition and privacy risks, i.e., retailers should not be able to obtain pricing information about a specific customer through product identifier codes.

- 4.64. The Authority has taken the SDFG's views into account when progressing our proposal.

### **Code amendment request**

- 4.65. In late 2023 the Authority received a Code Amendment Request named *Retailers provide information about available retail plans*.<sup>9</sup>
- 4.66. The code amendment proposal was to amend the definition of "generally available retail tariff plans" to include any other available retail tariffs that retailers could offer as the ICP is currently configured, and as the ICP could be configured.
- 4.67. The Authority's initial assessment of this proposal was that it could support the Authority's objective to promote competition and its additional objective to protect the interests of domestic consumers and small business consumers, as it would improve the information available to consumers to empower them to make more informed choices.
- 4.68. We committed to carry out analysis of this proposal alongside our consultation to support electricity plan comparison and switching, and our subsequent consultations on improving consumer mobility by improving access to data.
- 4.69. Given that the Authority's current work to amend EIEPs considers changes to how information about electricity products is obtained from retailers, including how to broaden the scope of what is captured beyond the current definition of 'generally available', we consider that it is now timely for the Authority to consider this proposal in greater detail.
- 4.70. As such, we will consider how any changes to EIEPs may be aligned with the objectives of this Code amendment proposal as part of our next stage of consultation, including whether specific changes are needed to ensure consumers are being offered plans that may be available to them with a different ICP configuration.

## **5. The Authority has decided to move forward with an amended proposal**

- 5.1. Having considered the feedback received in consultation, the Authority has decided to move forward with our proposed preferred option – to create a suite of modular and mandatory EIEP14s. We consider that this option would best deliver the desired outcomes of greater consumer mobility, enabled through improving access to electricity product data for consumers and third parties.
- 5.2. The Authority's new proposal builds on our initial proposal by making changes based on the feedback received in consultation. These are outlined below.

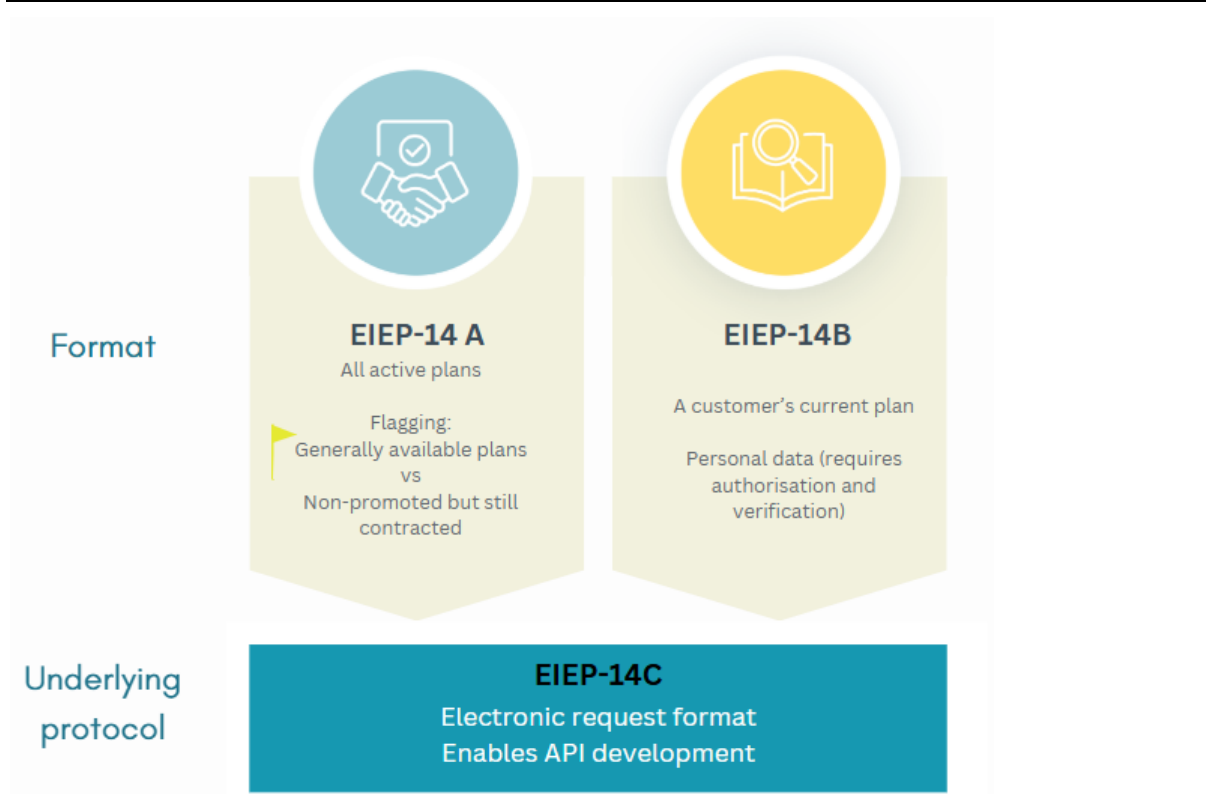
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<sup>9</sup> Code Amendment Register number: CAR175

## Simplify the modular suite of EIEP14s

- 5.3. In response to feedback, we are proposing to combine EIEP14A and EIEP14B into a single EIEP14A.
- 5.4. The new protocol would capture all active plans, both generally available and non-promoted but still contracted to consumers. Retailers would identify (through a ‘flagging’ process) whether plans are “generally available” or “not actively promoted,” eliminating duplication across two protocols.
- 5.5. “Historic plans” - those that are no longer contracted to any consumer - would not be included in the scope of the new EIEP14A. We would also exclude specific plans that were never generally available, such as staff discounts and other specialised plans.
- 5.6. We propose to continue with the proposed EIEP14C, which would request a consumer’s current plan, and the proposed EIEP14D, which would enable the electronic request of EIEP14s. We propose to amend the lettering so that the proposed EIEP14C becomes EIEP14B, and EIEP14D becomes EIEP14C.

**Diagram 2: Regulated suit of EIEP14s refined following consultation**



## Rationale for the change

- 5.7. As noted in section 3 above, most submitters supported the Authority’s preferred option for creating a modular suite of EIEP14s. Some, however, raised concerns with the scope of the proposed EIEP14B protocol.

- 5.8. Combining the proposed EIEP14A and EIEP14B provides a more efficient and proportionate way to deliver the transparency consumers need while addressing concerns raised by industry about duplication and cost.
- 5.9. The Authority considers that this approach:
- (a) Reduces unnecessary complexity - retailers no longer face the burden of developing parallel systems for similar datasets, minimising compliance costs and effort.
  - (b) Preserves consumer benefit - by requiring visibility of all active plans, including those not promoted but still contracted, we ensure third-party services can make accurate comparisons. This prevents “hidden plans” from distorting competition or disadvantaging disengaged consumers.
  - (c) Supports innovation and trust - clear, consistent data exchange lowers barriers for innovators to build new tools and services, while giving consumers confidence that the information they receive is complete and reliable.
  - (d) Aligns with digitalisation goals - a simplified, modular EIEP14 suite is easier to integrate with future developments such as real-time APIs under the Consumer Data Right, ensuring the system is future-proof and scalable.

Q1. Do you agree with the Authority’s proposal to combine the proposed EIEP14A and EIEP14B? If not, why not?

### **Introduce a unique plan identifier code to address structural issues with plan identification and dataset integration**

- 5.10. After considering the strong supportive response to our question on unique product identifier codes, the Authority considers it prudent to introduce this to our proposal moving forward.
- 5.11. It is clear from the feedback received that a product identifier code would be beneficial to consumers, retailers, and third-party data users in helping to identify individual plans from each other in an easy and machine-readable way.
- 5.12. The Authority is therefore proposing to amend the Code to:
- (a) require retailers to allocate a product identifier code to each of its retail tariff plans, and
  - (b) require retailers to provide information on available plans and their associated product identifier codes when requested, and
  - (c) require retailers to provide the product identifier code to a consumer (or their agent) when requested, which is applicable to that consumer’s ICP.
- 5.13. Our intention is for each product identifier code to function as a simple, machine-readable identifier, enabling consistent recognition of the exact plan a household or business is on. This could be a simple numeric number, or an alphanumeric code which incorporates the retailer’s participant code (which was a common suggestion in feedback).
- 5.14. By establishing a product identifier codes system, the Authority aims to:

- (a) **Create a single source of identification for plans** — Retailers often use different internal names for plans, recycle similar names, or make variations to plans based on a variety of criteria. A unique identifier would remove ambiguity and confusion and ensure accuracy in billing, switching, and consumer advice
  - (b) **Enable data integration** — With product identifier codes embedded in EIEP14 datasets and billing systems, different datasets could be matched seamlessly. This would help improve the consistency of data systems across the industry, as all plans would follow the same naming convention and have an individualised code by which they can be identified
  - (c) **Reduce friction for consumers** — Instead of deciphering plan names, consumers and service providers could rely on a clear code to identify their plan. This would simplify switching, comparisons, and complaint resolution
  - (d) **Future-proof the system** — Unique identifiers are standard practice in modern data engineering, from product barcodes in retail to ISINs in finance. Introducing product identifier codes would bring electricity retail datasets in line with best practice and prepare the sector for interoperability with CDR and other digitalisation initiatives
  - (e) **Strengthen trust and transparency** — Accurate plan matching would build consumer confidence that advice tools, switching platforms, and billing reforms are giving them the right information.
- 5.15. Product identifier codes would provide consumers and data users with a simple way to identify a consumer's existing plan, and to distinguish between plans within the retail market. This would help to reduce the scope of information that a consumer needs to consider when comparing plans, as well as reducing the effort required to identify a current plan.
- 5.16. In turn, we believe this would significantly improve the experience for consumers comparing and switching plans, as it would improve the visibility and accessibility of necessary information to provide an accurate comparison for consumers.
- 5.17. Further design work would be required to develop the product identifier codes, which could potentially be done as part of consultation on the EIEPs themselves. This would include considering the necessary security protocols to protect sensitive information, which is particularly important for allowing third parties to obtain ICP-specific plan details.
- 5.18. For consumers, product identifier codes may enable a future electricity system where a consumer is easily able to provide third parties with all the necessary information in real time for an accurate product suggestion to be provided to them.

### Rationale for the change

- 5.19. As noted above in section 3, submitters strongly supported the introduction of product identifier codes.
- 5.20. The introduction of product identifier codes would solve the inability for consumers, their agents, or switching and comparison services, to unambiguously identify and match retail electricity plans to ICPs. This is a long-standing issue in the electricity market that creates inefficiencies, confusion, errors, and barriers to innovation.

- 5.21. The Authority considers the introduction of product identifier codes a proportionate and forward-looking intervention that addresses the needs of both consumers and industry participants now and into the future. It provides a simple mechanism to provide clarity for households, efficiency for retailers, and interoperability for innovators. It is a foundational step in building a modern, data-driven electricity market, and the feedback received in consultation also demonstrates the benefits of product identifier codes for consumers, data-users, and industry participants.
- 5.22. The Authority is simultaneously considering how product identifier codes could be included in electricity bills so that they are visible to the consumer. We are considering this as part of our work to standardise electricity bills.
- 5.23. Doing so would create a link between consumer bills and the standardised product data formats, meaning that information about any plan is easily identifiable. This in turn would improve transparency for consumers, while also enabling greater interoperability.

Q2. Do you agree with the Authority's proposal to introduce a unique plan identifier code system for all retail electricity plans? If not, why not?

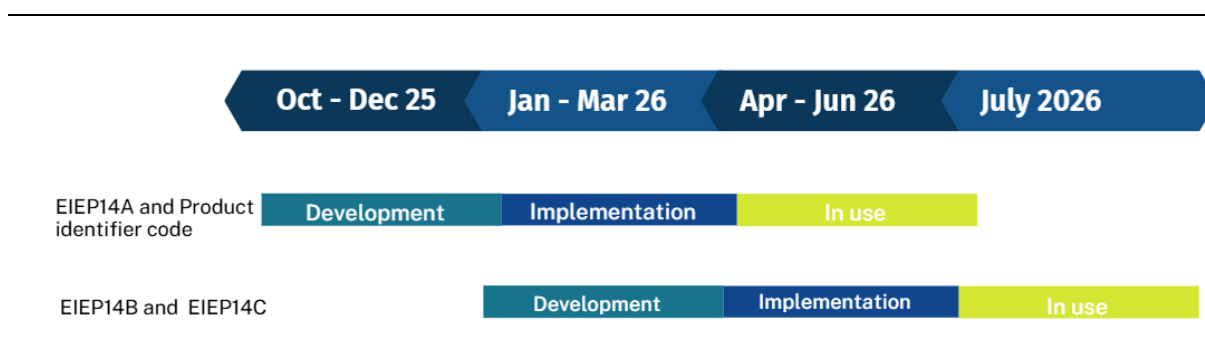
Q3. Do you have any suggestions for how the product identifier code system could be implemented?

Q4. How could product identifier codes be included on electricity bills such that they can be utilised by everyday consumers?

### A staged approach to developing and implementing the full suite of EIEP14s

- 5.24. We are proposing to stage the design, development, and implementation of the new suite of EIEP14 protocols. This differs from the approach outlined in the consultation paper, which was for all protocols to be designed, developed, and implemented at the same time within six months.
- 5.25. A phased approach would enable robust technical co-design with industry, reduce implementation risks, and allow consumer benefits to be delivered earlier rather than waiting for a full suite of protocols to be completed.
- 5.26. This would also allow us to align the development of EIEP14B with the development of standards for the exchange of electricity consumption data.
- 5.27. **Diagram 3** below demonstrates our proposed staged approach:

**Diagram 3: Proposed staged approach to developing and implementing the new EIEP14s**



## Rationale for the change

- 5.28. As noted above in section 3, most submitters advocated for a phased approach to transitioning to the new EIEP14s as the industry standard for exchanging product data.
- 5.29. A staged approach would allow us to deliver early benefits for consumers while giving industry the time and flexibility to adapt systems and processes. This would allow us to achieve our goals of more standardised information flows, while balancing the practicality of building the proposals in a way that would minimise risks and deliver benefits for most use cases.
- 5.30. Beginning with EIEP14A would allow the Authority to establish the foundation for the exchange of product information – that being accurate plan identification, consistent metadata, and visibility of all active plans. These elements address the most pressing consumer pain points at relatively low complexity.
- 5.31. This approach would avoid the risks of errors in implementation if all protocols were introduced at once. Such an approach could delay benefits, increase upfront costs, and create risks of inconsistency across the sector. Phasing instead would allow us to learn, test, and refine before progressing to more complex and case-specific protocols.
- 5.32. We note that the creation of EIEP14B may be influenced by the design and implementation of product identifier codes. This will be relevant for the development of consumption data standards. Taking this staged approach would allow flexibility in designing these standards considering progress made with product identifier codes, avoiding unnecessary duplication.
- 5.33. We believe that EIEP14C (the automatic request protocol) would be relatively straightforward to design and implement, once the primary EIEP14 formats have been developed. It is important that the ability to make an automatic request is available as soon as possible, to enable automatic exchange of this information.
- 5.34. The phased pathway also allows us to align with the CDR such that we can embed authentication, consent, and security processes when the policy and technical settings are clearer. This would ensure the sector does not duplicate effort or build systems that need to be re-engineered later to adhere to requirements under the CDR legislation or electricity designation regulations.
- 5.35. This approach would still mean that consumers will see tangible value early in the journey. With EIEP14A and product identifier codes in place, consumers and third-party services would be able to accurately identify and compare plans well before more advanced protocols are delivered. Once these have been developed, the Authority can design the protocol to enable the transfer of this information through the registry EIE system and develop the proposal to obtain the specific plan information.
- 5.36. Phasing would also allow us to ensure that smaller retailers are not disadvantaged. Spreading investment over time, combined with the development of guidance tools would lower compliance costs and reduce barriers to entry, while still delivering strong consumer outcomes.

Q5. Do you agree with the Authority's proposed staged approach to designing and implementing EIEP14s? If not, why not?

## 6. The Authority is proposing amendments to the Code

### The proposed amendments

- 6.1. The Authority proposes to amend various clauses of Part 11 of the Code to better enable access to, and exchange of, electricity product information. The drafting of the proposed amendment is contained in Appendix A.
- 6.2. We propose to amend the Code to:
  - (a) extend the existing requirement on retailers to provide information on generally available retail tariffs, to also provide information on plans which, although active, are not generally available, and product identifier codes, upon request
  - (b) empower the Authority to prescribe an Electricity Information Exchange (EIE) system for the provision of electricity product information
  - (c) require retailers to apply unique product identifier codes to every retail tariff plan they offer
  - (d) require retailers to provide the applicable product identifier code to consumers or their agents upon request, for the consumer's ICP.
- 6.3. With this proposal, we seek to:
  - (a) ensure that consumers and third-party service providers have access to up-to-date and accurate information about the electricity products available to consumers
  - (b) create (and regulate) a standardised protocol for the exchange of electricity product information
  - (c) establish a regime where individual pricing plans can be easily identified by consumers, retailers, and third-party service providers to improve the process of identifying and comparing electricity plans.

### Extending existing requirements on retailers to provide product information upon request

- 6.4. The Authority is proposing to amend clause 11.32G of the Code.
- 6.5. The current 11.32G requires retailers to provide information only on generally available tariffs, upon request by a person (which can include a comparison website provider). The proposed amendment would broaden what is captured by this clause so that plans that are still active in the market (but may not be "generally available") are also required to be provided on request. It also extends to product identifier codes so that retailers are also required to provide, on request, the product identifier codes associated with their plans.
- 6.6. We are also proposing to amend 11.32G to compel retailers to comply with the procedures and any relevant EIEP, published by the Authority. This would ensure that the exchange of data is made via the standardised method prescribed in the EIEP14s that would be designed in consultation with the industry

- 6.7. We are also proposing to remove the ability of a retailer to charge for requests for this data if the request is in a different format to what the retailer normally uses.

### **Creating a standard for electricity product data through the EIE system**

- 6.8. We are proposing to amend 11.32F of the Code to empower the Authority to also prescribe an EIE for the purposes of 11.32G.
- 6.9. This would allow the Authority to regulate the EIEP14s that it develops as mandatory protocols that retailers must follow when responding to requests made for product information. In essence, this will empower us to standardise how electricity information is exchanged.
- 6.10. As mentioned above, the Authority would design these EIEPs in collaboration with the industry and other stakeholders in a separate round of consultation.

### **Implement a new product identification code system**

- 6.11. The Authority is proposing to add a new clause 11.32AB to introduce a requirement for retail tariff plans to be associated with product identifier codes. This requirement would require retailers to associate their retail tariff plans with product identifier codes that can be used to distinguish their plans from others in the marketplace. We are proposing to prescribe, to some extent, the format of product codes and the procedures for applying them, based on consultation with the industry in relation to the design of the EIEP14s.
- 6.12. We are also proposing to amend clauses 11.32B and 11.32E to clarify that these clauses – which dictate how retailers must respond to requests for information by consumers and their authorised agents about consumption information – also apply to product identifier codes.
- 6.13. This also includes a proposed amendment to Schedule 11.6 (as referenced in 11.32E) to provide agents with the authority to request a consumer's product identifier code. This facilitates the ability of consumers (or their agents) to request their product identifier code for their current retail plan (and their ICP) with that retailer.
- 6.14. We note that the existing timeframes for responding to requests remain in place. We have not sought to amend these timeframes at this stage, considering the Authority's recent decision to not amend timeframes in 11.32B following consultation on a proposal to do so.<sup>10</sup>
- 6.15. Feedback on that consultation, which the Authority agrees with, was that it would be of greater benefit to consumers for changes to timeframes to be made with a full picture of how data standards and processes would overlap with any potential electricity sector designation under the Consumer Data Right.
- 6.16. The ultimate goal of the Authority's work in this space is to achieve near instantaneous exchange of information. These standards are a significant step towards achieving a more interoperable system, and it is our expectation that parties will work towards achieving on-demand data exchange.

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<sup>10</sup> Refer to the Code Amendment Omnibus #4: [Code amendment omnibus #4 | Our consultations | Our projects | Electricity Authority](#)

- 6.17. The Authority may consider amending these timeframes within the Code at a later date to reflect our expectation of instantaneous data exchange.

Q6. Do you agree with a Code amendment extending existing requirements on retailers in 11.32G to provide product information upon request?

Q7. Do you agree with the removal of the ability for retailers to charge for data requests where those requests are made in a format the retailer does not normally use in 11.32G? If not, why not?

Q8. Do you agree with a Code amendment to empower the Authority to prescribe an EIEP for the purposes of 11.32G? If not, why not?

Q9. Do you agree with a Code amendment requiring retailers to associate their retail electricity plans with product identifier codes? If not, why not?

Q10. If implemented, should the details of how the product identifier codes system be established within the Code, or within guidance documents that the Authority would publish?

Q11. Do you agree with the Authority's proposal to not amend timeframes for retailers to respond to requests at this time? If not, why not?

## 7. Evaluation of the proposal against the status quo

### **The Authority considers the proposal is preferable to the status quo**

- 7.1. In summary, the Authority considers the proposed amendment is preferable to the status quo for addressing the lack of a standardised, mandatory and timely means of accessing electricity product data.
- 7.2. The proposal would enable consistent and standardised data access while aligning with broader CDR developments and support greater consumer mobility. This view is supported by feedback received in consultation.
- 7.3. Compared to the status quo, the proposed amendments would:
- (a) allow for the Authority to create an industry standard (which we would consult on) for the exchange of electricity product information through the EIEP system. This would mean that both data users (third-party service providers) and data holders (electricity retailers, MEPs) can design systems and processes to transact data exchange requests with confidence and universality
  - (b) ensure that parties who require access to this data to provide tools and services for the benefit of consumers will have unfettered access to it. It will also incentivise retailers to structure their product data in a way that is consistent with these protocols, helping to create a more comparable retail electricity market
  - (c) create a system with easily identifiable electricity retail plans and a unique product code would allow third party service providers to quickly identify and distinguish between different electricity plans. This is particularly useful given the volume of retail plans that exist on the market.

## We have refined the evaluation criteria to reflect feedback

- 7.4. In consultation, submitters were broadly supportive of the Authority's proposed criteria for assessing options. However, several submitters asked us to make explicit the importance of not stifling innovation, proportionality of compliance costs, suitability for future needs, data quality and reliability, implementation risk, and international alignment.
- 7.5. We have therefore refined the criteria to ensure they capture these dimensions and provide a balanced, future-focused basis for comparing the status quo with the preferred option.
- 7.6. The following tables shows our assessment of the proposal against the status quo. Specifically:
- (a) **Table 1** below outlines our proposed criteria for assessing our proposal against the status quo, informed by feedback in consultation
  - (b) **Table 2** below shows our preliminary assessment of the proposal against the refined criteria after feedback.

**Table 1: Refined proposed criteria for assessing proposal against status quo**

Criteria	Description
<b>Effectiveness</b>	Extent to which the option delivers accurate, timely, and standardised product data for consumers, their agents, and third-party providers of tools and services.
<b>Efficiency and proportionality</b>	Whether the benefits to consumers and the market justify the cost of implementation, ongoing compliance, and system change.
<b>Feasibility and implementation risk</b>	The practicality of implementing the option within a reasonable timeframe, considering industry readiness, cost, technology maturity, and transition risks
<b>Innovation and futureproofing</b>	The degree to which the option enables innovation rather than stifling it, and remains adaptable to emerging technologies, business models, and consumer needs.
<b>Data quality and reliability</b>	The extent to which the option safeguards the accuracy, consistency, and reliability of data across providers.
<b>Strategic and international alignment</b>	The degree to which the option aligns with broader reforms such as digitalisation, decentralisation, consumer mobility, and potential electricity CDR, and is consistent with international best practice.

Q12. Do you agree with our refined proposed assessment criteria?

Q13. Do you agree with the Authority's preliminary assessment that the proposal is better than the status quo? If not, why not?

**Table 2: Preliminary assessment of amended proposal against the refined proposed criteria**

Criteria	Status quo (Voluntary EIEP4)	Proposal (Regulated modular EIEP14 + product identifier codes, phased)
<b>Effectiveness</b>	<b>Low</b> Patchy coverage: formats interpreted inconsistently; non-promoted plans often invisible to tools; hard to unambiguously match plans to consumers	<b>High</b> Mandatory scope covering all active plans; product identifier codes enables precise plan matching; clearer fields support consumer mobility and third-party tools.
<b>Efficiency and proportionality</b>	<b>Low</b> Low direct compliance costs, but high market-wide search and matching costs; duplication across tools; persistent consumer detriment	<b>Medium</b> Transitional compliance costs, but enduring system-wide savings (reduced search/matching friction); modular design limits scope creep; duplication removed.
<b>Feasibility and implementation risk</b>	<b>Medium</b> No change burden; but ongoing fragmentation risk; dependency on goodwill creates drift.	<b>Medium</b> Phased delivery lowers risk; targeted scope (all active plans + product identifier codes) first; co-design and testing mitigate transition risks.
<b>Innovation and futureproofing</b>	<b>Low</b> Innovation inhibited by data inconsistency and missing identifiers; integrations are bespoke, brittle.	<b>High</b> Standardised fields + product identifier codes unlock API-ready use; clear upgrade path to CDR-style real-time exchange; modular standards can evolve.
<b>Data quality and reliability</b>	<b>Low</b> Variable; inconsistent definitions and naming; harder to audit; higher error rates in matching/analytics.	<b>High</b> Common fields and format, validation rules and identifiers improve accuracy, comparability and auditability across retailers and tools
<b>Strategic and international alignment</b>	<b>Low</b> Limited alignment; harder to interoperate with comparator regimes; weak foundation for CDR.	<b>High</b> Aligns with digitalisation and consumer-mobility programme; positions NZ for CDR designation and draws on AU/UK experience
<b>Overall score</b>	<b>Low</b>	<b>High</b>

## 8. Regulatory statement for the proposed amendment

### Objectives of the proposed amendment

- 8.1. As noted above, the objective of our proposed amendment is to:
- (a) ensure consumers and third-party service providers have access to up-to-date and accurate information about the electricity products available to consumers
  - (b) create (and regulate) a standardised protocol for the exchange of electricity product information
  - (c) establish a regime by which individual pricing plans can be easily identified by consumers, retailers, and third-party service providers to easily compare electricity plans.

Q14. Do you agree with the objectives of the proposed amendment? If not, why not?

### The proposed amendment's benefits are expected to outweigh the costs

- 8.2. The Authority's preliminary view is that the proposed Code amendment would have a positive net benefit for the reasons set out below.
- 8.3. We note that MBIE has produced a Regulatory Impact Statement (RIS) for the designation of the electricity sector under the CDR regime. Many of the costs and benefits of aligning our product data standards with the CDR regime are articulated in that document.<sup>11</sup>

### Costs

- 8.4. The Authority understands there would be significant costs on industry participants, primarily retailers, to build systems and processes to implement the new EIEP14s in accordance with the proposed new Code requirements.
- 8.5. We also expect there to be some cost on retailers to commit time and resources to the co-design process with the Authority. This may include attendance at joint workshops or engagements, providing feedback on draft standards, testing and implementing new standards, and establishing relationships with data users. However, the Authority considers that resource committed to aiding in this design process will alleviate the risk of errors (and resulting costs) in the long run.
- 8.6. The implementation of product identifier codes to each retail plan offered by a retailer would also be a cost on those retailers. However, it is our understanding that retailers already operate with their own internal product codes. We therefore believe it shouldn't require much cost or effort to update these codes to the format eventually created for product identifier codes and/or the EIEP14s.
- 8.7. These are preliminary views of costs based on feedback received in our first consultation. We are interested to hear feedback from industry on these initial views of the costs.

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<sup>11</sup> Refer to the MBIE website: [Regulatory Impact Statement: Establishing a consumer data right](#)

## Benefits

### Consumer benefits

- 8.8. The Authority's preliminary view is that the proposal presents a net benefit to consumers and participants. We see the key benefits as:
- (a) increased transparency about electricity plans, driven by more accessible plan data
  - (b) greater innovation and development in the tools and services designed to benefit consumers, through improved access to timely, accurate, and reliable data
  - (c) increased switching by consumers driven by increased engagement with the retail electricity market, through increased transparency of plan information and/or engagement with more accurate comparison and switching tools
  - (d) greater innovation in retail electricity products, driven by the effects of greater competitive pressure through increased consumer engagement.

### Retailer benefits

- (e) decreased integration and operational costs, due to there being only one mandated standard for the exchange of product information (i.e. retailers will only have to build one system, rather than making bespoke arrangements)
- (f) if correctly implemented and operationalised, reduced need to commit resource to managing data requests due to the automated nature of the requests
- (g) more trust and confidence, driven by more consistent access to plan information from retailers
- (h) higher opportunity to promote innovative products to consumers, as information will be more easily disseminated through information exchanges.

### Electricity market / system benefits

- (i) more accurate and timely market monitoring through greater visibility of electricity market pricing
- (j) improved competition driven by greater visibility of market prices and increased consumer engagement with the retailer market
- (k) builds a foundation for CDR and future actions: product data standards become the bedrock for CDR "designated actions" and future real-time APIs – minimising rework if designation lands
- (l) promoting future innovation: open, comparable plan data stimulates third party services (bundles, DER, EV, smart tariffs), consistent with UK "Open Energy" and data-access goals.

Q15. Do you agree with the Authority's preliminary assessment that the benefits outweigh the costs? If not, why not?

## 9. The proposal promotes our statutory objectives

- 9.1. The Authority's main objective is to promote competition in, reliable supply by, and efficient operation of, the electricity industry for the long-term benefit of consumers. The Authority's additional objective is to protect the interests of domestic and small business consumers in relation to their electricity supply.<sup>12</sup>
- 9.2. The Authority considers the proposed Code amendments are consistent with the Authority's statutory objectives, as they would promote:
- (a) the protection of the interests of domestic consumers in relation to retailers' direct dealings with them, by promoting greater transparency of retailers' offerings.
  - (b) competition in the electricity industry for the long-term benefit of consumers, by promoting higher levels of comparison and switching among consumers through improved access to data by consumers and third-party data users acting to support consumers.

Q16. Do you agree that the proposal promotes the Authority's statutory objectives? If not, why not?

## 10. Next steps

- 10.1. The consultation will be open for six weeks, closing on 18 November 2025. During that time, the Authority will be open to receiving any feedback or queries regarding the proposal. Please reach out to [consumer.mobility@ea.govt.nz](mailto:consumer.mobility@ea.govt.nz).

### The Authority will develop the new EIEP14s

- 10.2. In October and November, the Authority will design the new EIEP14s. Throughout this design period, we will engage with stakeholders to collaboratively design these new data standards. This includes discussions with the Authority's Switch and Data Formats Group, from whom we must seek feedback from on any proposed changes to EIEPs.
- 10.3. The Authority plans to conduct several workshops with interested stakeholders, to discuss, design, and collaboratively construct the new standards. These will be undertaken from mid-October through mid-November. Further details will be provided to stakeholders through the Authority's Market Brief.
- 10.4. Following this consultation, we will further consult on the proposed new EIEP14s at the end of 2025. Subject to consultation, the Authority intends to finalise the EIEPs and accompanying Code amendments in early 2026. Retailers should prepare for an implementation period of around three to six months.

### Related workstreams will continue to progress

- 10.5. Concurrently, the Authority is also consulting on proposed changes to electricity bills to drive better outcomes for consumers. There are significant overlaps between

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<sup>12</sup> See [section 15](#) of the Act.

these two workstreams, most notably regarding product identifier codes. We encourage stakeholders to engage with that consultation.

- 10.6. We will also be exploring the creation of standards for the exchange of electricity consumption data to pair with these standards. This work will begin shortly, and we will seek to consult with interested parties in early 2026.
- 10.7. We also note that MBIE is progressing work on a potential electricity designation under the CDR. The Authority will continue to work closely with MBIE to align our work with progress made with the CDR.

## **11. Attachments**

- 11.1. The following appendices are attached to this paper:

**Appendix A Draft Code amendment**

**Appendix B Format for submissions**

# Appendix A Draft Code amendment

## 1.1 Interpretation

[...]

**product identification code** means the unique code assigned by a retailer in accordance with clause 11.32AB to certain of its retail tariff plans.

[...]

### **11.32AB Product identification codes for retail tariff plans**

- (1) Each **retailer** must apply a unique **product identification code** to each of its retail tariff plans that come within clause 11.32G(1).
- (2) Such **product identification codes**:
  - (a) may be prescribed by the Authority; and
  - (b) must be in the format prescribed by the Authority.
- (3) Each **retailer**, must if requested to do so by a **consumer** with whom the **retailer** has a contract to supply electricity, give that **consumer** the **product identification code** and the retail tariff plan applicable to the **consumer's** ICP.

### **11.32B Requests for information**

- (1) A **retailer** to which a request is made under clause 11.32A or 11.32AB must give the information to the **consumer** no later than 5 **business days** after the date on which the request is made.
- (2) In responding to a request, the **retailer** must comply with the procedures, and any relevant **EIEP**, published by the **Authority** under clause 11.32F.
- (3) A **retailer** must not charge a fee for responding to a request, but if a **consumer** makes more than 12 4-requests in respect of a consumer's information have been made in the a 12 month period before 1 June 2026, the **retailer** may impose a reasonable charge for further requests in that ~~12 month~~ period.

[...]

### **11.32E Agents**

If a **consumer** authorises an agent to request information under clause 11.32B on behalf of the **consumer**, a **retailer** must deal with any request from the agent for information about the **consumer** under clause 11.32B in accordance with:

- (a) clauses 11.32A, 11.32AB and 11.32EB;
- (b) clause 11.32ED, if a request:
  - (i) includes a statement from the agent that the agent has obtained, or the request is accompanied by, a written authority from the **consumer** in the form and containing the information required by Schedule 11.6; and
  - (ii) the request is made through the **EIE System**; and
- (c) the Privacy Act 2020, where applicable.

[...]

### **11.32ED Additional requirements on retailers for authorisations in prescribed form and**

### **requests received through the EIE System**

- (1) This clause applies where an agent requests information from a **retailer** on behalf of a **consumer** under clause 11.32B and:
  - (a) subject to clause 11.32EE, either:
    - (i) the request includes a statement from the agent that the agent has obtained a written authority from the **consumer** in the form and containing the information required by Schedule 11.6 (being an authority that remains in force at the date the request is made); or
    - (ii) the agent separately provides a written authority in the form and containing the information required by Schedule 11.6 or a copy of such a written authority (being an authority that remains in force at the date the request is made); and
  - (b) the request is made through the **EIE System**.
- (2) If this clause applies:
  - (a) the **retailer** must use all reasonable endeavours to take the steps in clauses 11.32EA(1)(a) and 11.32EA(2), as applicable, within 2 business days of the later of:
    - (i) receiving the request; or
    - (ii) receiving a copy of a written authority under subparagraph (1)(a)(ii); and
  - (b) where clause 11.32EA(3) applies, the **retailer** must use all reasonable endeavours, within 2 **business days** of receiving further information from the agent, to take the steps in clause 11.32EA(3)(a).
- (3) Where clause 11.32EA(2) applies, the **request retailer** may include a request that the agent provide a copy of the written authority referred to in subclause (1)(a), if not provided with the request.
- (4) If a request is made through the **EIE System**, but the **retailer** believes on reasonable grounds that the request does not meet the requirements of the **EIEP**, subclauses (2) and (3) do not apply but, for the avoidance of doubt, the **retailer** must still comply with clauses 11.32B, 11.32EB and 11.32EC.

[...]

### **11.32EG Authority may prescribe EIE System**

- (1) The **Authority** may prescribe a system for the purpose of clauses 11.32E to 11.32ED for the:
  - (a) exchange of information between **participants**;
  - (b) the provision of information by **participants** to other **participants** or other persons; and
  - (c) the making of requests for information by **participants** or other persons to **participants**.
- (2) The **Authority** must advise **participants** and other parties of any system it prescribes under subclause (1) by posting a notice of the prescribed system on the **Authority's** website.

### **11.32F Authority to publish procedures for responding to requests for **consumption** information**

- (1) The **Authority** must—
  - (a) **publish**, and keep **published**, procedures under which a **retailer** must respond to a request from a **consumer** under clause 11.32B and **11.32G**; and
  - (b) prescribe 1 or more **EIEPs** with which a retailer must comply when

responding to such a request.

- (1A) The **Authority** must **publish** an **EIEP** it prescribes under subclause (1).
- (2) The procedures **published** by the **Authority** must specify the manner in which information must be given to **consumers**.
- (3) Each **EIEP** prescribed by the **Authority** must specify 1 or more formats in which information must be given to **consumers**.
- (4) Before the **Authority** prescribes an **EIEP** under subclause (1), or amends an **EIEP** that it has prescribed under subclause (1), it must consult with the **participants** that the **Authority** considers are likely to be affected by the **EIEP**.
- (5) The **Authority** need not comply with subclause (4) if it proposes to amend an **EIEP** prescribed under subclause (1) if the **Authority** is satisfied that—
  - (a) the nature of the amendment is technical and non-controversial; or
  - (b) there has been adequate prior consultation so that the **Authority** has considered all relevant views.

#### Access to product information

### 11.32G Retailers must provide product information ~~about generally available retail tariff plans~~

- (1) If any person asks a retailer to provide information about:
  - (a) 1 or more of the **retailer's** current **generally available retail tariff plans** and their applicable product information code; or
  - (b) tariff plans that were, but are no longer, generally available retail tariff plans but which remain active and are supplied to existing consumers, and their applicable product identification code.

the retailer must give the requested information to the person no later than 5 business days after receiving the request.

- (2) ~~If the person requests that information be provided under subclause (1) in a manner or format that differs from the manner or format the retailer typically uses to provide such information, the retailer may impose a reasonable charge for providing the information in the manner or form requested.~~

In responding to a request, the **retailer** must comply with the procedures, and any relevant **EIEP**, published by the **Authority** under clause 11.32F.

- (3) A **retailer** must not charge a fee for responding to a request, but if a person makes more than 12 requests in the 12 month period before 1 June 2026, the **retailer** may impose a reasonable charge for further requests in that period.

[...]

## ***Schedule 11.6***

### **Forms for authorisation of an Agent to request consumption information**

Schedule 11.6 inserted, on 1 March 2020, by clause 7 of the Electricity Industry Participation Code Amendment (Requirements and Processes for Information Requests by Agents) 2020.

#### **Form 1: Form for authorisation by an individual (being a natural person)**

Consumer: [Consumer full name]

Property: [property address (es)]

Customer number<sup>1</sup>: [customer number]

Installation Control Points (ICP(s)) Identifier(s): [List all ICPs]

Retailer: [name of Retailer]

Agent: [full name of Agent and contact details]

Period of authority: [enter period of authorisation to Agent]

I (being the Consumer named above) confirm that I own or occupy the Property identified above (or owned or occupied that property at the relevant time) or otherwise am or was responsible for the consumption of electricity at the Property.

I confirm that I am or have been a customer of the Retailer identified above in relation to the Property and ICP(s) identified above.

I authorise:

(a) the Agent identified above to request, receive and hold information on my behalf about:

- electricity consumption for the Property or the ICP(s); and
- the product identification code that applies to my tariff plan;  
and

(b) the Retailer to transfer the information at (a) on my behalf ~~about electricity consumption for the Property or ICP(s)~~ to the Agent.

[Signature/electronic signature of Consumer or of a person on behalf of the Consumer (in which case, evidence of that person's authority to sign on behalf of the Consumer is required) or other evidence of Consumer's agreement]

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<sup>1</sup> This is the customer number assigned to the Customer by the Retailer to whom the request is being made.

## **Form 2: Form for authorisation by a non-individual (not being a natural person)**

Consumer: [Consumer full name]

Authorised Representative of Consumer: [Full name and title/position with Consumer]

Property: [property address (es)]

Customer number<sup>2</sup>: [customer number]

Installation Control Points (ICP(s)) Identifier(s): [List all ICPs]

Retailer: [name of Retailer]

Agent: [full name of Agent and contact details]

Period of authority [enter period of authorisation to Agent]

The Consumer identified above owns or occupies the Property identified above (or owned or occupied that property at the relevant time) or otherwise is or was responsible for the consumption of electricity at the Property.

The Consumer is or has been a customer of the Retailer identified above in relation to the Property and, ICP(s) identified above.

The Consumer authorises:

- (a) the Agent identified above to request, receive and hold information on the Consumer's behalf about:
  - electricity consumption for the Property or the ICP(s); and
  - the product identification code that applies to my tariff plan; and
- (b) the Retailer to transfer the information at (a) on the Consumer's behalf ~~about electricity consumption for the Property or ICP(s)~~ to the Agent.

In signing this form as the Authorised representative of the Consumer, I warrant that I am authorised to sign this form and agree to the matters above on behalf of the Consumer.

[Signature/electronic signature of Authorised Representative].

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<sup>2</sup> This is the customer number assigned to the Customer by the Retailer to whom the request is being made.

## Appendix B Format for submissions

<b>Submitter</b>	
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<b>Questions</b>	<b>Comments</b>
Q1. Do you agree with the Authority's proposal to combine the proposed EIEP14A and EIEP14B? If not, why not?	
Q2. Do you agree with the Authority's proposal to introduce a unique plan identification code system for all retail electricity plans? If not, why not?	
Q3. Do you have any suggestions for how the product identifier code system could be implemented?	
Q4. How could product identifier codes be included on electricity bills such that they can be utilised by everyday consumers?	
Q5. Do you agree with the Authority's proposed staged approach to designing and implementing EIEP14s? If not, why not?	
Q6. Do you agree with a Code amendment extending existing requirements on retailers in 11.32G to provide product information upon request?	
Q7. Do you agree with the removal of the ability for retailers to charge for data requests where those requests are made in a format the retailer does not normally use in 11.32G? If not, why not?	
Q8. Do you agree with a Code amendment to empower the	

Authority to prescribe an EIEP for the purposes of 11.32G? If not, why not?	
Q9. Do you agree with a Code amendment requiring retailers to associate their retail electricity plans with product identifier codes? If not, why not?	
Q10. If implemented, should the details of how the product identifier code system be established within the Code, or within guidance documents that the Authority would publish?	
Q11. Do you agree with the Authority's proposal to not amend timeframes for retailers to respond to requests at this time? If not, why not?	
Q12. Do you agree with our refined proposed assessment criteria?	
Q13. Do you agree with the Authority's preliminary assessment that the proposal is better than the status quo? If not, why not?	
Q14. Do you agree with the objectives of the proposed amendment? If not, why not?	
Q15. Do you agree with the Authority's preliminary assessment that the benefits outweigh the costs? If not, why not?	
Q16. Do you agree that the proposal promotes the Authority's statutory objectives? If not, why not?	