

18 November 2025

Electricity Authority

By email to consumer.mobility@ea.govt.nz

Tēnā koe

Submission on proposed code amendments to improve access to product data

Thank you for the opportunity to provide a submission on the *Proposed Code amendments to improve access to electricity product data* (the consultation paper).

We support the Authority's goal of improving the transparency and accessibility of electricity product data to empower consumers and foster innovation in the retail electricity market. We also support the creation of a suite of modular and mandatory EIEP14s.

We are concerned about the proposed timeframes for implementing the EIEP14s. There is still a lack of clarity about how the unique product identifier code will be defined, which is critical to us being able to design, build and test the system changes required to support the code. Our current billing and pricing systems do not hold a unique product identifier and were not built to assume a relationship between customer discounts and plans existed, so the creation of the unique product identifier logic will be quite complex. Until the EIEP14A specifications are close to final, we will not be able to finalise the design of the system changes required to support the product identifier code, let alone build and test it. For these reasons, we expect at least 6 months would be required to build and test the product identifier code and EIEP14A as drafted.

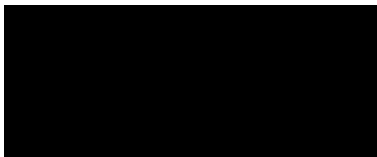
To help demonstrate the complexity of assigning a unique product identifier code in our billing and pricing systems, the table below shows the actual fixed and variable tariffs of two of our customers who are currently on the same pricing plan in the same region with the same meter configuration and distributor price category. One customer receives a 22% discount because they have bottled LPG and direct debit billing setup, whereas the other customer receives a 19% discount only. Based on our understanding of the consultation paper, we will need to assign different unique product identifiers for the pricing for these two customers, and therefore the EIEP14A file will need to be able to show all combinations of pricing and discounts that our 380,000 electricity customers are billed. That will likely mean that our EIEP14A will have millions of rows of data.

Example of the estimated annual impact of discounts on two customers currently on the same plan:

[Confidential information redacted from public version of submission]

Members of our pricing team will be attending the upcoming EIEP14 data workshops, and we look forward to working with our industry colleagues to help shape the design of the protocols.

Ngā Mihi



Brett Woods
Head of Regulatory and Government Relations
Contact Energy

Response to Consultation questions

Question	Response
Q1. Do you agree with the Authority's proposal to combine the proposed EIEP14A and EIEP14B? If not, why not?	<p>We believe an EIEP14A that only includes current in-market pricing would be more useful because the combined EIEP14A/B, based on the early versions of the specifications being drafted, will likely have millions of rows of pricing data to account for all the combinations of campaigns and discounts we have.</p> <p>We instead suggest that the EIEP14A be used for current pricing only because customer-specific pricing will be accessible via the EIEP14B and EIEP14C.</p>
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?	<p>We understand the potential value of the unique plan identification code being mandatory in the EIEP14s. We note, however, that the definition of 'unique plan' needs clarity, because as noted above the early specifications of the EIEP14A will likely lead to the file having millions of rows of prices because of the combinations of campaigns and discounts.</p> <p>The EA refers to the unique identifier helping "ensure accuracy in billing, switching and consumer advice". It's unclear what relevance, if any, the identifier has to either billing or switching accuracy. It is likely to be a 8-12 alphanumeric character code that will mean nothing to a customer other than when using a comparison site that requests it. It is also likely to be largely redundant once the EIEP14B, C and CDR are in place.</p>
Q3. Do you have any suggestions for how the product identifier code system could be implemented?	<p>Until the EIEP14A specifications are close to finalised, we are not going to be able to implement the product identifier code because the logic will need to be created from scratch in our billing and pricing systems, and is likely to be complex.</p>
Q4. How could product identifier codes be included on electricity bills such that they can be utilised by everyday consumers?	<p>We are concerned that the proposed product identifier code will be unintuitive and unhelpful for consumers. We understand its potential value as part of a back-end system for comparing tariff rates, but it may not aid in consumer understanding of their bill. This is because we understand that a unique code will be required for every combination of plan and discount, which could result in thousands of unique identifiers across the customer base.</p>
Q5. Do you agree with the Authority's proposed staged approach to designing and implementing EIEP14s? If not, why not?	<p>We agree with prioritising the EIEP14A, although as noted above we do not believe the proposed timeframes are realistic. We would suggest beginning with the EIEP14A with current active plans only because that is likely to offer the most value to third party comparison providers.</p> <p>The proposed timeframes for the EIEP14B and C look very challenging, assuming that they'll share the same platform as the</p>

	<p>personal consumption data and given that there is still a number of steps required before the CDR requirements come into force. Ensuring appropriate security and privacy controls are in place prior to sharing personal consumption data is likely to be complex.</p> <p>We note that the timeframes on page 10 appear to refer to EIEP14 workshops from mid-October to mid-November, however the first workshop is only taking place from 20 November and will likely continue well into the new year due to the complexity of the proposed standards and the importance of getting it right.</p>
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?	<p>We believe that it's appropriate that we are able to recover reasonable costs, if we receive requests for the product data in formats that vary significantly from the EIEP14 protocols. Depending on the final specifications of the EIEP14s, reshaping the data is likely to be a significant amount of work, which could be saved if requestors are incentivised to adopt the prescribed format where possible.</p>
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?	<p>The current wording doesn't appear to capture the level of detail required for the product identification code. As shown in the example earlier of two customers with the same nominal pricing but with an estimated \$100 annual difference in costs, the EIEP14s need to be unique to each combination of plan and any criteria that impact the price (e.g. discounts). Otherwise it won't be possible to accurately compare a customer's current pricing with other pricing.</p>
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?	<p>We believe that the 'Efficiency and proportionality' of the proposed EIEP14 protocols is 'Low' and the current approach should be 'Medium'. Based on our current understanding that load shifting of TOU plans will not be reflected in the new Billy site, there is a reasonable chance that plan comparisons will be less accurate than the current approach. The costs of building the product identification code and displaying it on the bill are also likely to be significant.</p> <p>We also note that the 'Data quality' rating of 'High' is dependent on the EIEP14 specifications being accurate and having the ability to account for the range of discounts and incentives offered by plans.</p>
Q14. Do you agree with the objectives of the proposed amendment? If not, why not?	Yes.
Q15. Do you agree with the Authority's preliminary assessment that the benefits outweigh the costs? If not, why not?	<p>We have the following comments on the costs and benefits listed:</p> <ul style="list-style-type: none"> • The preliminary assessment states that retailers already operate their own internal product codes but this is not correct. Contact does not have unique product codes that align with the current proposed EIEP14 format. Until the EIEP14A specification is finalised, we will not know what system changes will be required to handle the large range of plans and discounts we offer. • We also note that the integration and operational costs will be significantly higher than the current approach. We are also concerned that the new format may lead to Time of use plans being unfairly disadvantaged if the EIEP14 protocols do not allow any load shift to be accounted for. • If the new format and appearance of plans on Billy disadvantages time of use plans then the changes will likely hinder innovation rather than promote it. • We don't see any benefit from the proposal to market monitoring because the EA already receives far more accurate and detailed data through the Retail Market Monitoring monthly data than will be available from the EIEP14s.
Q16. Do you agree that the proposal promotes the Authority's statutory objectives? If not, why not?	Yes, however we believe the proposal could do with significant refinements to reduce the costs and increase the benefits.