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Submissions
Electricity Authority
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Via email: consumer.mobility@ea.govt.nz

ERGANZ SUBMISSION ON CODE AMENDMENTS TO IMPROVE ACCESS TO ELECTRICITY PRODUCT DATA

The Electricity Retailers' and Generators' Association of New Zealand ('ERGANZ') welcomes the opportunity to provide feedback on the Electricity Authority's consultation paper, 'Proposed Code amendments to improve access to electricity product data' from October 2025.

ERGANZ is the industry association representing companies that sell electricity to Kiwi households and businesses. Collectively, our members supply almost 90 per cent of New Zealand's electricity. We work for a competitive, fair, and sustainable electricity market that benefits consumers.

Executive summary

Overall, ERGANZ supports the Electricity Authority's continued work to improve access to standardised electricity product data as part of its broader consumer mobility programme. Accurate and consistent product data will support consumers to better understand their electricity options, compare offers with confidence, and switch plans more easily. We share the Authority's goal of a competitive, transparent market that delivers innovation and long-term value for consumers.

At the same time, implementation must be proportionate, practical, and sequenced to ensure benefits outweigh costs. Retailers are already digesting substantial regulatory and system changes, including billing reforms and preparations for the Consumer Data Right (CDR) designation. The proposed changes should therefore be prioritised and staged in a way that delivers consumer benefits while managing cumulative industry compliance costs.

ERGANZ is committed to working with the Authority to ensure the reforms deliver tangible benefits for consumers while remaining practical for retailers to implement.

Submission points

ERGANZ supports replacing the current voluntary EIEP14 with a regulated, modular suite of product data exchange protocols. Moving to standardised, machine-readable formats will reduce duplication, improve data accuracy, and enable third-party tools and services to operate with greater reliability and transparency. This change will help consumers receive more accurate and personalised information about their electricity options and should, over time, encourage greater engagement and competition in the retail market.

We support the Authority's proposal to phase implementation, beginning with the development of EIEP14A to cover all active plans, before introducing additional protocols once the framework is tested and proven. A phased approach will allow early delivery of benefits while giving retailers time to adapt their systems and processes. ERGANZ strongly encourages the Authority to continue a design approach in partnership with industry participants to ensure the protocols are workable in practice and align with the technical and operational realities of retailers' systems.

We welcome the Authority's decision to remove the previously proposed EIEP14B, which would have required retailers to provide data on all historical plans. This change appropriately reflects feedback from ERGANZ and others that the proposal was disproportionate to the likely benefits. The revised focus on active, generally available, and legacy plans strikes a better balance between improving transparency for consumers and keeping compliance costs manageable.

ERGANZ supports, in principle, the introduction of unique product identifier codes for each retail plan. A consistent system for identifying plans will help consumers and comparison tools accurately confirm the exact plan, simplify data matching across systems, and reduce confusion when comparing options.

However, we consider that the design and governance of such a system should be industry-led and flexible. Retailers already use internal plan codes, and any national identifier framework should build on these existing systems rather than requiring a complete redesign. The Authority should ensure that implementation timing and technical detail remain flexible so that the new identifiers can be integrated smoothly into billing systems and data-exchange standards.

We note the proposed extension of retailer obligations under clause 11.32G to include legacy plans and product identifier codes. While ERGANZ supports consumers having access to relevant information, the scope of these obligations should be clearly defined to avoid duplication or confusion. We also recommend that the Authority reconsider its proposal to remove the ability for retailers to recover reasonable costs where non-standard data formats are requested, as this may place an unnecessary burden on participants. Retaining the ability to recover reasonable costs for non-standard requests ensures that data access remains efficient and does not inadvertently create incentives for inefficient request behaviours.

ERGANZ supports the Authority's intention to align this work closely with MBIE's Customer and Product Data Act framework. Developing the electricity product data standards in a way that complements the CDR will minimise duplication and reduce future compliance costs. Alignment between agencies is essential to build a coherent, interoperable data environment that works for

both consumers and industry. Therefore, ERGANZ strongly recommends the Authority work closely with MBIE officials on this.

Finally, successful implementation will require appropriate support for smaller retailers and for retailers operating multiple brands. Detailed technical guidance, shared testing environments, and reasonable transition periods will help ensure all participants can meet the new requirements without undue disruption to customers.

Consultation questions

Questions	Comments
Q1. Do you agree with the Authority's proposal to combine the proposed EIEP14A and EIEP14B? If not, why not?	Yes. ERGANZ supports combining the two protocols into a single EIEP14A covering all active plans, both generally available and legacy. This improves implementation somewhat and helps keep compliance costs proportionate.
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?	ERGANZ supports this proposal in principle. Unique product identifiers will help consumers and third parties (such as comparison tools) accurately match and compare plans. However, implementation must be industry-led, pragmatic, and compatible with existing retailer systems to avoid unnecessary cost and complexity.
Q3. Do you have any suggestions for how the product identifier codesystem could be implemented?	The system should build on retailers' existing internal product codes, supplemented by a consistent structure, such as including the retailer's participant code to ensure uniqueness.
Q4. How could product identifier codes be included on electricity bills such that they can be utilised by everyday consumers?	Codes should appear in a clear, standardised position on bills, close to the plan name, with a short label such as "Plan ID". Consumers should also be able to use the same code when entering details into comparison tools. Any explanatory text should be simple and written in plain language to aid consumer understanding. ERGANZ recommends the Authority adopt a principles approach to this rather than prescribing exactly how each retailers' bill should look.
Q5. Do you agree with the Authority's proposed staged approach to designing	Yes. A phased rollout is essential. Starting with EIEP14A and the product identifier system allows early benefits while giving retailers time to adjust systems

and implementing EIEP14s? If not, why not?	and processes. Later stages can incorporate learnings and align with CDR data standards.
Q6. Do you agree with a Code amendment extending existing requirements on retailers in 11.32G to provide product information upon request?	Yes, subject to clear scoping. Extending access to include active legacy plans is sensible, but the obligation should exclude historic or bespoke arrangements with no consumer relevance.
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?	No. Retailers should retain the ability to recover reasonable costs where requests require non-standard formats or significant manual effort. Removing this ability risks creating unmanageable costs for high-volume or bespoke requests and could disadvantage smaller participants.
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?	Yes. Empowering the Authority to prescribe a standardised EIEP for product information will ensure consistency and interoperability across the market, provided the protocols are developed collaboratively through an open co-design process.
Q9. Do you agree with a Code amendment requiring retailers to associate their retail electricity plans with product identifier codes? If not, why not?	Yes, in principle. This requirement will improve clarity. The Authority should, however, allow flexibility in how identifiers are generated and ensure that governance arrangements protect commercially sensitive information.
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?	Details should be set out in Authority-published guidance rather than fixed in the Code. This allows the system to evolve with technology and the forthcoming Consumer Data Right framework without requiring further Code amendments.
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?	Yes. ERGANZ agrees that response-time changes should wait until data standards and CDR interoperability are clear.
Q12. Do you agree with our refined proposed assessment criteria?	Yes. ERGANZ particularly supports explicit recognition of proportionality and implementation risk.
Q13. Do you agree with the Authority's preliminary assessment that the proposal is better than the status quo? If not, why not?	Broadly, yes. The proposal provides a clearer, standardised framework that will improve transparency and competition. The benefits will depend on

	proportionate implementation, especially around cost recovery and system complexity.
Q14. Do you agree with the objectives of the proposed amendment? If not, why not?	Yes. The objectives to improve access to accurate plan data, standardise exchange protocols, and make plans easily identifiable are well aligned with ERGANZ's objectives to benefit consumers and promote an efficient market operation.
Q15. Do you agree with the Authority's preliminary assessment that the benefits outweigh the costs? If not, why not?	ERGANZ agrees the benefits are likely to outweigh the costs, provided implementation is staged and designed based on industry input.
Q16. Do you agree that the proposal promotes the Authority's statutory objectives? If not, why not?	Yes.

Conclusion

ERGANZ would like to thank the Authority for considering our submission.

If there are any outstanding questions or a need for further comments, please let me know.

Yours sincerely,

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