**Vector Limited**
110 Carlton Gore Road
PO Box 99882
Newmarket
Auckland 1149
+64 9 978 7788 / vector.co.nz

18 November 2025

Electricity Authority
PO Box 10041
**Wellington 6143**

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

**Proposed Code amendments to improve access to electricity product data – Consultation Paper**

1. This is Vector's ("our", "we") response to the Electricity Authority's consultation paper on Proposed Code amendments to improve access to electricity product data dated 8 October 2025 ("Paper"). This submission is not confidential and can be published on the Authority's website.

2. Vector welcomes the opportunity to comment on the Electricity Authority's Paper. While the proposed amendments primarily place obligations on retailers, we want to highlight the significant benefits that access to standardised retailer product data can provide to electricity distributors, and the broader value of making this data available across the sector.

3. Distributors would benefit from accessing retailer product data in the following ways (which we elaborate on further below:

    a. Insights from retailer data sharing
    b. Enhanced network planning and investment
    c. Improved pricing and cost allocation
    d. Better customer service and resolution
    e. Facilitating market transparency and competition
    f. Enabling future data driven reforms

*Insights*

4. In 2024, Vector received a list of ICPs on a retailer's TOU retail plans. This data was provided to help Vector better understand the impact of changing customer behaviours on our network assets, particularly at the low voltage level. This dataset was extremely helpful in enabling us to:
    a. Identify how TOU customers were changing traditional loadings on our network assets;
    b. Understand how different TOU plans incentivised different behaviours, resulting in varied network asset outcomes; and
    c. Gain critical insights into evolving consumer behaviour, which is essential for planning and managing our network. In particular, in combination with our own EV owners'

survey data, this provided significant learnings into how EV owners were responding to various incentives and shifting load out of our TOU peaks

5. Given the important and revealing insights from this initial analysis, Vector is seeking to build a more comprehensive view of how various TOU plans, and indeed other pricing plans, in the Auckland region are changing customer load patterns and, consequently, the loadings on our assets—especially at the distribution transformer and low voltage level. This work is also becoming a critical input for the continued development of our evolving distribution pricing, flexibility products, and industry guardrails.

6. The more complete Vector's dataset is, the more insights we can glean, and the better we can work with retailers to support the evolution of product and pricing sets in the market. Each retailer's data could provide unique insights to distributors, due to the subtle differences in retail offerings to consumers.

*Enhanced network planning and investment*

7. Retailer tariffs and products have a significant influence on when and how consumers use electricity. Access to detailed, standardised retail tariff data will enable distributors to better understand and forecast demand patterns, especially as new retailer products – such as time of use (TOU), electric vehicle (EV) tariffs and demand response offerings - are introduced. Importantly, visibility of these products allows distributors to assess and manage the risks associated with changing consumer behaviour. When we initially obtained TOU data, our primary interest was in determining if encouraging customers (herding customers) to use electricity at specific times was causing additional peak loads on low voltage distribution transformers. As more customers adopt these types of plans, ongoing access to granular tariff data will be essential for monitoring and mitigating potential impacts on network assets.

8. With improved visibility of retailer offerings, distributors can more accurately plan network upgrades, maintenance, and investment, ensuring the more efficient use of resources and minimising costs for consumers. In addition, understanding both the opportunities and risks associated with new retail products supports proactive asset management and helps avoid unintended consequences, such as localised overloading or accelerated asset wear.

*Improved pricing and cost allocation*

9. Access to retailer product data also allows distributors to collaborate with retailers on innovation in and evolution of our tariffs and services, such as our residential DER tariff, which can help support sector-wide innovation.

*Better customer service and resolution*

10. When responding to customer complaints, distributors can provide more accurate and relevant information if we understand the retail products customers are on. For example, if a customer contacts us about a perceived supply issue, knowing whether they are on a TOU plan, a demand response product, or another type of retail offering can help us with

investigating complaints about supply reliability or voltage fluctuations, as certain retail products may encourage usage at times that impact local network performance.

*Facilitating market transparency and competition*

11. Access to standardised product data supports transparency across the supply chain, enabling all participants – including distributors – to make informed decisions and support a more competitive and innovative market.

12. Distributors are increasingly required to demonstrate how we are supporting consumer outcomes and market efficiency. Access to retailer product data can help support more robust reporting and efficiency.

*Enabling future data-driven reforms*

13. As the sector moves towards greater data sharing and interoperability e.g. under the CRD regime, it is important that all participants, including distributors, can access and use standardised product data to support new services and consumer empowerment. Understanding retail tariffs is critical for distributors as more customers adopt DER (solar, batteries, EVs etc) to ensure network operations and pricing remains efficient, fair and affordable.

*Summary*

14. We encourage the Authority to ensure that the design of new EIEP14 protocols and product identifier systems allows for appropriate access by distributors, either directly or via authorised agents, where this supports efficient network operation and consumer outcomes. As part of ongoing digitalisation and CRD workstreams we also recommend further consultation on the value and mechanisms for sharing retailer product data with distributors and other sector participants. Facilitating access to product data across the supply chain, in our view, supports industry wide collaboration, innovation and efficient investment, which ultimately drives better consumer outcomes.

15. Vector supports the Authority's objectives to improve access to electricity product data and encourages consideration of the broader sector benefits, including for distributors. Our experience demonstrates the tangible value of retailer product data for network management, planning and innovation. We look forward to engaging further as the protocols and standards are developed.

Yours sincerely

[redacted]

Monica Choy