

Proposals for Electricity Information Exchange Protocol 14A – Retailer product information

Consultation paper

5/03/2026

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Executive summary

Improving access to product information will benefit consumers

The Electricity Authority Te Mana Hiko (Authority) is improving and standardising the access to electricity product information to strengthen the underlying data infrastructure of the retail electricity market.

Clear, consistent and accessible electricity product information enables third parties – such as comparison and switching services – to deliver accurate and reliable information to consumers.

Better information strengthens competition and supports innovation. When retailers operate in a market where product information is transparent and comparable – competitive pressures benefit consumers by putting downward pressure on price and lifting service quality. This benefits all consumers – even those who do not actively compare or switch.

We have made Code changes to standardise electricity product information

In October 2025, the Authority decided to improve access to electricity product information by replacing the existing non-regulated Electricity Information Exchange Protocol 14 (EIEP14) with a modular suite of new regulated protocols.

The Authority also consulted on amendments to the Electricity Industry Participation Code 2010 (the Code) to prescribe these regulated EIEPs for product information.

After considering feedback, the Authority has decided to implement the proposed amendments with some changes to address concerns and improve clarity. The Code amendment requiring use of these regulated EIEPs will come into effect on 30 October 2026. This decision has been published on our [website](#).

The Authority is now developing a new EIEP14A

Following these decisions the Authority proposes a new, regulated protocol EIEP14A: Retailer Product Information (EIEP14A).

The proposed EIEP14A provides the specific format retailers must use to provide information to consumers, their authorised agents, or authorised third-party service providers about their plans in the market. This includes generally available and legacy plans (plans that are not promoted but still provided to consumers).

These proposals have been developed through workshops with retailers and third-party service providers such as comparison and switching sites. We thank all attendees who contributed to shaping these proposals.

EIEP14A will enable standardised data exchange from 30 October 2026

Implementation of new EIEP14s is aligned with other Code changes aiming to improve the quality and accessibility of consumer information and consumer choice. These include improvements in electricity billing and requirements for retailers to offer time-varying pricing plans.

Together, these reforms strengthen the information environment enabling clearer advice, more reliable comparisons and more effective competition.

Next steps

The Authority seeks feedback on the proposed EIEP14A. Consultation is open until 26 March 2026, with a final decision expected in April 2026.

Consultations for EIEP14B and EIEP14C are expected to follow in the second half of 2026.

1 What you need to know to make a submission

Purpose of this consultation paper

- 1.1 The Authority has decided to require retailers to provide information about electricity products in a prescribed EIEP14 format. This requirement applies when retailers are responding to a request for product information, unless an alternative format is agreed, and initiated by the requestor.
- 1.2 This paper seeks feedback on the specific form and design of this EIEP14A format which will regulate the exchange of information about electricity products supplied by a retailer to its existing or prospective customers.
- 1.3 This proposal seeks to:
 - (a) Address limitations of the current non-regulated EIEP14.
 - (b) Require consistent, reliable and timely industry information-sharing practices.

How to make a submission

- 1.4 The Authority's preference is to receive submissions in a Word document in the format shown in **Appendix D**.
- 1.5 Submissions should be emailed to consumer.mobility@ea.govt.nz with 'Consultation - name of consultation' in the subject line by 5pm, 26 March 2026.
- 1.6 The Authority will confirm receipt of all submissions electronically. Please contact the Authority if you do not receive electronic acknowledgement of your submission within two business days.
- 1.7 If you cannot send your submission electronically, please email consumer.mobility@ea.govt.nz or call 04 460 8860 to discuss alternative arrangements.
- 1.8 We will publish all submissions. If you consider that we should not publish any part of your submission, please:
 - (a) indicate which part should not be published and explain why,
 - (b) provide a version of your submission that we can publish (if we agree not to publish your full submission).
- 1.9 All submissions, including any parts 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 Act.

2 Consistent and reliable access to product data promotes innovation and improves outcomes for consumers

The Authority is creating mandatory standards for exchanging product information

- 2.1 Standardising electricity product information improves the reliability and accessibility of the retail market's data infrastructure. This supports better information for consumers through more accurate comparisons and a more efficient market.
- 2.2 When retailers operate in a market where product information is transparent and comparable, competitive pressure increases giving retailers stronger incentives to innovate. Innovation improves service offerings and brings downward pricing pressures. This will benefit all consumers, including those who do not actively engage.

Standardisation is achieved through the use of an EIEP

- 2.3 Electricity information exchange protocols (EIEPs) facilitate the regular or large volume exchange of electricity information between traders and distributors, and between retailers and third-party providers. EIEP may be regulated or non-regulated.
- 2.4 EIEP14A will primarily be used by retailers to provide product information to third-party services, such as comparison and switching providers, or other authorised parties acting on behalf of consumers.

Standardisation of product data supports our wider consumer mobility work programme

- 2.5 Following consultation¹ in November 2025, the Authority decided to implement amendments to the Code to replace the voluntary Electricity Information Exchange Protocol 14 (EIEP14) with the following suite of modular and regulated EIEP14s:
 - (a) EIEP14A – All active plans (and their associated product identification codes) – flagging generally available plans and non-promoted plans but still contracted.
 - (b) EIEP14B – A customer's current plan – involving personal data and requiring authorisation and verification.
 - (c) EIEP14C – Electronic request format enabling API development.
- 2.6 The Code amendments also require retailers to assign unique product codes to their retail electricity plans and provide those codes when requested.
- 2.7 This is also closely related to the Authority's work to improve electricity billing. The billing changes require minimum mandatory information to be clearly and prominently presented in all residential billing communications, regardless of channel. One of those mandatory elements is the unique product code.

Improving access to electricity product information supports “Open Electricity” to benefit consumers and expand choice

- 2.8 On 11 January 2026, the Government announced that retail electricity will be the next sector to be designated under the Customer and Product Data Act 2025 (CPD Act).

¹ [Proposed Code amendments to improve access to product data | Our consultations | Our projects | Electricity Authority](#)

- 2.9 The CPD Act established an economy-wide framework for automated, real-time exchange of information between data holders, consumers, and accredited requestors, ensuring privacy and security safeguards are met. The framework is often referred to as the “Consumer Data Right” (CDR).
- 2.10 “Open Electricity” – also referred to as an “electricity CDR” – will mean customers can access information about their electricity consumption and available product offerings quickly, clearly, and securely and be able to share that information securely with others who can help them get the most out of that data.
- 2.11 The Government intends for consumers to see changes from September 2026, with all changes completed by mid-2027. We are working closely with other Government agencies to ensure our work is aligned so that product information standards both serve today’s market and are coherent with Open Electricity proposals.

3 The Authority is to prescribe a regulated format for the exchange of product information

- 3.1 The Authority must prescribe one or more EIEPs as the chosen format for the exchange of electricity product information.² This format must be used by a retailer when responding to any request made for product information.³
- 3.2 The previous non-regulated EIEP14 provided a voluntary format and structure that could be used by retailers when responding to a request for the retailer’s generally available tariff plans.
- 3.3 Our decision to replace the existing EIEP14 with a modular suite of EIEPs reflects our assessment that the current EIEP was not fit for purpose and was not meeting consumer needs for product information.
- 3.4 Under the new approach, EIEP14A will be the regulated format for exchanging product information including information on retailers’ generally available retail tariff plans and legacy plans (plans that remain active but are no longer generally available) along with their associated product identification codes.
- 3.5 Product information must be provided in the prescribed format, unless both parties agree, and the requestor requests that the information is provided in an alternative format.
- 3.6 To support implementation of these Code changes, this paper seeks feedback on the proposed format of the new EIEP14A protocol.

Typical EIEP standard

- 3.7 EIEP specifications typically follow a style consistent with other industry functional specifications. This style resembles the following:

Section	Description
Header information	Title, Code references, and dependencies
Description	Purpose of the EIEP
Business requirements	Business requirements
Data inputs	Information required to produce a data file
Header	Identifying file data
Detail	The information to be exchanged
File specifications	Supporting field information, naming standards and rules for field population including example files
Data outputs	For other intended recipients e.g. registry or reconciliation

- 3.8 The proposals in this paper focus primarily on how the ‘Header’ and ‘Detail’ sections operate in relation to:
 - (a) **Structure** – how EIEP14A groups product information to allow parties to represent information efficiently and clearly.

² Clause 11.32F of the Code

³ Clause 11.32G of the Code.

- (a) **Attributes** – the data points requested in the protocol that enable parties to obtain meaningful and accurate representations of product information.

Typical representations of product information

3.9 Electricity plans have typically four key dimensions. These are represented in an illustrative example given in Figure 2 (*relevant colour in brackets*):

- (a) The Customer Group and Plan (*circled in red*).
- (b) The Network, defined by the distributor and a list of network supply points and/or distributor price codes (*circled in green*).
- (c) The ICP/metering data - direction, register content code (RCC), and period of availability (POA) - included in the Tariff (rate) rows (*circled in blue*)
- (d) The time of use (Schedule rows) - month, day type, time of day applying to each tariff (*circled in purple*).

Figure 2: Key product information dimensions

Customer Type + Plan RES-TOU-STD												
Network	Tariff Region	Tariff Type:			Tariff Type Schedule							
		Name	Dir, RCC, POA	Daily Chg	Summer				Winter			
					Weekday		Weekend		Weekday		Weekend	
Day	Night	Day	Night	Day	Night	Day	Night					
ALPE_ABY0111	South Cant.	Controlled	X-CN-17, X-IN-17	3.67	0.2233	0.2071	0.1916	0.1957	0.2484	0.2180	0.2210	0.2004
ALPE_BPD1101		Uncontrolled	X-UN-24	3.67	0.2680	0.2485	0.2299	0.2348	0.2981	0.2616	0.2652	0.2405
...	
CKHK_CPK0111	Wlg	Controlled	X-CN-17, X-IN-17	3.90	0.2435	0.1962	0.1958	0.1970	0.2320	0.2011	0.2249	0.1939
SMRT_DST0011		Uncontrolled	X-UN-24	3.90	0.2922	0.2354	0.2350	0.2364	0.2784	0.2413	0.2699	0.2327
...	
...

3.10 Eligibility criteria, discounts and fees are represented as additional supplementary Attribute rows at the Customer Group, Plan or Tariff level. These include, for example:

- (a) discounts for prompt payments and direct debits,
- (b) pre-payment requirements, credit checks, sign-up fees and credits, and termination claw-backs,
- (c) bundling requirements (e.g. plans available only with bundled gas),
- (d) eligibility requirements and/or charges relating to meter types, phases, and capacity limits, and
- (e) plans that are a function of the market spot price are identified by Attributes which designate that the tariff rates are a function of the spot price rather than a fixed dollar rate.

The structure and attributes of the current EIEP14 mean the protocol is cumbersome and inefficient

We have drawn on industry insights through workshops

- 3.11 In developing the proposals for a new EIEP14A, the Authority held a series of co-design workshops with third parties (such as comparison and switching sites), retailers and other industry participants. The Authority also engaged with the Switch and Data Formats Group (SDFG) separately on the proposals and preparation for these workshops.⁴
- 3.12 These workshops were delivered by the Authority in partnership with Middleware New Zealand (Middleware).
- 3.13 While the workshops focused primarily on EIEP14A, discussions also covered concepts relevant to the design of the entire EIEP14 suite.
- 3.14 Feedback on the current formats (both CSV and JSON) noted that they were cumbersome, and inefficient to construct and interpret. Key concerns highlighted included:
- (a) the need to repeat Attribute and Schedule lines for every line to which they apply,
 - (b) the inability to group Networks (primary and embedded) that share common tariffs,
 - (c) the requirement to define a distinct Plan for each Network, noting that the current format offered contradictions within the standard and has caused confusion and inconsistency for participants when interpreting and using the form, and
 - (d) the current lack of a standardised mechanism to identify a plan uniquely across retailers.
- 3.15 A full list of issues raised is outlined in Appendix A: Summary of workshop feedback.
- 3.16 Attendees also noted that the existing EIEP14 is rarely used. Only two retailers reported use of EIEP14, while others noted they had attempted to use it but abandoned their efforts. Even those retailers who used EIEP14 commented they did not strictly follow the standard.
- 3.17 As a result, most retailers instead use alternative approaches to share information with comparison and switching services.

We have also reviewed existing tariff structures

- 3.18 The Authority analysed a sample set of tariff files from retailers, provided during development of our new switching and comparison service, to gather further insights into how retailers represent their plans.
- 3.19 We observed common patterns in tariff and plan summaries supplied to the Authority. In general, retailers used either:
- (a) generic, nationwide plans (around 2-20 plans) with varying tariffs across networks/distributors, or
 - (b) fine grained, per-network plans (hundreds or thousands of plans).
- 3.20 Retailers who did not use EIEP14 typically supplied plan information in one of two ways:
- (a) a flat list of tariffs with each of the defining parameters (Network/Region, Direction-RCC-POA, time-of-use month/day/hour, other attributes) presented as columns, together with one or more rates (see **Figure 2**, above), or

⁴ 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](#)

(b) a matrix where defining parameters are arranged in a regular pattern of rows and columns, with the rates as cells (as in **Figure 3**, below).

Figure 3: Flat list of tariffs

Plan Id	Tariff Id	Description	Distrib	NSP	DPC	Dir	RCC	POA	Month	Day Type	Time	Rate
RES-TOU-STD	12345	WN-TS-WIN-Night	CKHK		RSU	X	CN	17	APR-SEP	WD	2200-0600	0.2145
RES-TOU-STD	12346	WN-TS-WIN-Day	CKHK		RSU	X	CN	17	APR-SEP	WD	0600-2200	0.2538
...

3.21 The patterns we observed in the data similarly indicated that retailers (and third-party services providers) are currently exchanging information in a multitude of ways, highlighting the need for a standardised format.

4 We have developed a new protocol for exchanging product information

- 4.1 The new EIEP14A includes proposed changes to both the structure and the attributes, of the existing EIEP14, as well as other minor content changes. This chapter sets out:
- (a) **Structural changes** – to ensure the protocol enables retailers to represent generally available retail tariff plans and legacy plans efficiently and effectively.
 - (b) **Attribute changes** – to enable the format to represent product information comprehensively.
 - (c) **Minor content changes** – to support the effective functioning of the format as a information exchange process.

Structural changes

- 4.2 Structural changes are needed to ensure the protocol enables retailers to represent generally available retail tariff plans and legacy plans efficiently and effectively.
- 4.3 The Authority has identified a range of structural improvements which are reflected in our proposal for EIEP14A. We present two options to achieve the intended outcomes but differ in how a participant would represent a tariff.
- 4.4 The proposed options are as follows:
- (a) **Option 1 (EA preferred) – Enhanced approach**
 - (i) Plans can span multiple regions (with less repetition of attributes)
 - (ii) Redundant fields are removed due to improvements in structure
 - (iii) Enables explicit representation of tariff structure.
 - (b) **Option 2 – Incremental approach**
 - (i) Plans can span multiple regions (but reference to Network definitions must be repeated)
 - (ii) More modest variation to existing EIEP14 structure.

Option 1 – (EA preferred) Enhanced approach

- 4.5 This option includes the following changes to the status quo:
- (a) To better reflect the retailers' tariff patterns, we propose two new structures (CSV row types or JSON objects) to be defined at Retailer level and referenced by Tariffs within any Plan:
 - (i) a **Tariff Type**, which decouples the combinations of tariff parameters (including Schedules and attributes) from the individual tariff rates in the matrix:
 - This allows each cell in the pricing matrix to be represented as a single object/row. Efficiency and regularity can be further enhanced by allowing multiple (RCC-POA) pairs within each tariff type, with a new "RCC-POA" field replacing the separate Register Content Code and Period of Availability fields.
 - The redundant requirement to specify a register content code of "Fixed" (already indicated by the mandatory "Fixed / Variable" field) for fixed tariffs is removed.

- (ii) a **Tariff Region**, which aggregates Networks (primary and embedded) that share common Tariffs:
 - The efficiency savings are typically more modest (0-20%), and sometimes the number of combinations used (Tariff Regions) may in fact exceed the number of Networks, but the structure allows retailers to name and abstract the set of networks that apply to a Tariff rate.
 - The absence of a Tariff Region field implies that a common rate applies to all Networks.

Option 2 – Incremental approach

- 4.6 Option 2 is a more modest and simpler variation of the existing EIEP14, and was proposed by several attendees during the workshops.
- 4.7 Option 2 provides that:
 - (a) **Schedules** and **Attributes** are decoupled from their parent objects.
 - (b) **Tariffs** are linked indirectly to **Plans** via **Networks**, allowing the same plan to be defined nationwide or at least across multiple networks, but the proposed **Tariff Type** and **Tariff Region** objects are not included.
 - (c) A **Network** record containing all blank fields can be used to signify that the linked Tariff records apply to all Networks excluding any Networks listed explicitly under the Plan.

The Authority prefers Option 1

- 4.8 The Authority currently prefers Option 1. We consider this is the best way to address the limitations raised during workshops as detailed above and in Appendix A.
- 4.9 Option 1 allows the recipient of an EIEP14A file to construct a tabular representation of a retailer's tariffs in a logical structure, clearly showing how tariff rates are derived from the customer's network location, time-of-use and meter settings (flow direction, register content code and period of availability).
- 4.10 In most cases Option 1 will reduce the repetition of information and therefore be more efficient, especially for retailers whose tariff rates are common across multiple networks and metering configurations.
- 4.11 While Option 2 is simpler than Option 1, it requires more repetition of information and does not convey the logical tariff structure explicitly. Structure could still be implied by naming conventions on tariffs, but this would not be standardised.

Structural changes common to both options

- 4.12 Discussions with workshop attendees highlighted the current structure of EIEP14 had issues which caused it to be inefficient, unnecessarily rigid and increased chances of presenting information not readily incorporated by requestors systems.
- 4.13 Examples included unnecessary duplication of plan representations, diminished ability for easy direct tabular viewing in a spreadsheet, and problematic for time/date specificity in regard to schedules.
- 4.14 To respond to issues raised by stakeholders, the following general changes to the structure of the existing EIEP14A are proposed:
 - (a) Naming and defining **Schedules** and **Attributes** at the Retailer level, and referencing them by name from the relevant **Tariff Type**, **Plan** or **Customer Type** records.

- (b) Multi-valued fields (e.g. **Month** and **Day Type** fields in **Schedules**, and **Network Supply Points** and **Distributor Price/Loss Categories** in **Networks**) should be represented as JSON lists in the JSON format for ease of processing and conformance testing, rather than space-separated lists as specified in the CSV format.
 - (c) ISO 8601 date and date-time formats – e.g. “2025-06-23” and “2025-06-23T14:53:17+12” – should be adopted for both CSV and JSON representations, in line with API standards and NZ government mandated standards. ISO 8601 is already used for dates in the existing EIEP14 JSON examples, but this is not explicit in the text. This applies to the **Header** timestamp (**Report Run Date** and **Report Run Time**, now combined as **Report Run Date-Time**), **Attribute Date Value** fields, and **Plan Start/End/Stop** dates.
 - (d) The **Header “Uniquifier”** file/transaction correlation identifier field should be a 128-bit Universal Unique Identifier (UUID) represented in the 36-character RFC 9562 format – e.g. “a9d48b18-6b1e-439c-9d05-9b144543a96e” – rather than 15 character free-form to allow matching with API HTTP header fields.
 - (e) The file **Header** should be mandatory only for CSV files, and conditional on EIEP 14C requirements for the JSON representation when EIEP14A is used in an API context.
- 4.15 We have clarified that the direction of the Authority would be to support UTF-8 character representation. The existing 2016 EIEP14 specification restricts files to a subset of the US-ASCII character encoding, which is itself a subset of UTF-8.
- 4.16 While EIEP14A retains this, future changes may be made to allow a broader character set within UTF-8 to better support representation of usages such as macrons present in te reo Māori. Until such changes, senders and recipients of EIEP14A files may relax the ASCII restriction by mutual agreement.
- 4.17 We note EIEP14 already allows both CSV and JSON, but highlight feedback from workshop attendees for a greater movement towards JSON being promoted as a preferred format. We appreciate this feedback ahead of greater detailed discussion around APIs and format exchange, in particular, the development of EIEP14C.

Q1. Do you agree with our preferred option (Option 1)?

Q2. Do you agree with the structural changes we propose for both options? If not, please explain why?

Q3. Are there any other structural changes you consider necessary to support the protocol achieve its objective?

Q4. Do you agree with our proposal to adopt the ISO 8601 date and date-time formats? Do you foresee this adoption impacting your use of other EIEPs in any way?

Attribute changes

- 4.18 Feedback on the existing EIEP14 included that the existing EIEP14 lacks the attributes required to represent generally available retail plans well, and that additional attributes were required to enable this. This is more so now that EIEP14A will include legacy plans.
- 4.19 We are proposing to add the following new Attribute codes to the new EIEP14A (see Table 2).

Table 2 – Proposed new attributes for both options

Attribute	Description
DISCOUNT_ELECTRONIC_BILL	Discount for electronic billing.
PAPER_BILL_FEE	Fee for paper billing.
ELECTRONIC_BILL_ONLY	Paper billing is not supported.
LATE_PAYMENT_FEE	Late payment fee.
FREE_HOURS_PER_MONTH	Plan offers a set number of free hours each month.
FREE_HOURS_PERCENT_USAGE	Free hours as a percentage of usage or payment.
TARIFF_START_DATE	Date when the tariff rate came or will come into effect.
TARIFF_END_DATE	Date after which the tariff rate was or will be superseded.
TARIFF_CLOSE_DATE	Date after which the tariff will no longer be offered if subject to FIXED_PRICE_DURING_THE_TERM .
PREPAID_ONLY	Indicates plans or tariffs that are only available if prepaid. For a Tariff, this may be combined with start and end dates and consumption limits to achieve a “prepaid pack” representation.
GENERATION_ONLY	(The) plan includes electricity generation (flow direction “I” tariffs only)
MULTIPLE_TRADERS_ALLOWED	The plan or tariff is compatible with Multiple Trader Relationships.
KWH_MAX, KWH_MIN	Currently only applied to a plan, but could be extended to tariffs to indicate banding thresholds for stepped plans (where permitted).
CREDIT_CARD_ALLOWED	The plan supports payment by credit card.
CREDIT_CARD_FEE	Fee (fixed or %) charged for a credit card payment, if any.
DISCONNECTION_FEE_NON_PAYMENT	Fee for disconnection for non-payment.
DISCONNECTION_FEE_VOLUNTARY	Fee for customer-requested disconnection.
RECONNECTION_FEE	Fee for reconnection.
ELECTRIC_VEHICLE_PLAN	Plan intended for an electric vehicle user.
BATTERY_STORAGE_PLAN	Plan intended for a customer with local battery storage capacity.
SOLAR_GENERATION_PLAN	Plan intended for a customer with solar generation.
OTHER_GENERATION_PLAN	Plan intended for a customer with other generation (e.g. wind).

4.20 We propose that the **Utility Type** header field⁵ be retained to allow retailers to represent gas tariffs for overall value calculation by comparison and switching providers. We have included this in our proposal and example.

4.21 As extracts are frequently taken from snapshots rather than live data, we propose an optional additional date and time field in the header. The field **Data Extract Date-Time** will record the

⁵ Utility type is included in the existing EIEP 14 V1 (2016) standard description, but omitted from the accompanying examples in that protocol

time when the snapshot was taken. This is likely to be of greater significance for EIEP14B but is included here for consistency.

- 4.22 Retailers are required to assign a unique product identification code to their retail plans. The field '**Product Identification code**'⁶ replaces the current EIEP14s use of 'Retailers plan code'.
- 4.23 We have also included some attributes to align with details emerging from the development of the open electricity work programme.

Q5. Have we identified all the required attributes to be added? If not, what are we missing?

Q6. Do you agree with the attributes we propose to introduce into EIEP14A? If not, please identify which attributes and explain why not, or what changes are required?

Q7. Do you consider the protocol adequately enables representation of feed-in tariffs for different generation types?

Ability of EIEP14A to represent plans that feature elements of undisclosed value

- 4.24 Due to the standardised nature of the EIEP14A, there are specific challenges with representing plans that feature elements that do not disclose a monetary value.
- 4.25 Product offerings such as free appliances, free hours of electricity, or discounted short notice pre-paid rates all provide value to a customer — but the associated costs with providing that value are not disclosed to the customer, due to that value being unlocked by consumer behaviour (use of free hours of electricity), or embedded into other costs for electricity a consumer pays for (e.g. tariff rates being higher for a plan that includes a free appliance).
- 4.26 While EIEP14A will be flexible enough to represent that these products are included in a plan, our proposal does not reflect the specific consumer value these products provide.
- 4.27 On balance, we consider the best approach to reduce the risk of providing inaccurate information is to not attempt to represent the consumer value for elements of a plan that does not have a standard value (e.g. time-of-use tariff).
- 4.28 We recognise that the risk of EIEP14A not representing the monetary value for all types of product offerings could make it more challenging for third parties to reflect plan information readily.
- 4.29 This risk is expected to be offset by:
- (a) The modular suite of EIEP14s working together to support a requestor being able to request information about plans generally available on the market, as well as receive more specific information pertaining to their individual plan to be able to compare and contrast (via EIEP14B).
 - (b) Third party tool and service providers looking to add value where generally available plan information is missing detail regarding unique elements of a consumer's plan, and filling those gaps by asking the consumer about those details ahead of assessing how their plan sits in comparison with other available products (e.g. comparison and switching websites having a dialogue with the customer).
 - (c) Our proposed EIEP14A includes attributes about electricity products that are not directly related to a customer's electricity consumption (e.g. appliances, free periods of power

⁶ The Authority will shortly issue Guidelines for the individual format of these product identification codes.

etc.). This means the requestor will have an indication of what elements of undisclosed value are included in prospective electricity plans.

Q8. Do you agree with our assessment of the limitation of EIEP14A to represent aspects of electricity plans with undisclosed values? Do you believe this limitation is adequately offset for the reasons outlined above? If not, please explain why.

Minor content changes

Changes to EIEP14A business requirements to clarify standard processes take place for requests for additional attributes

- 4.30 The current EIEP14 contains wording in the business requirements section of the format that set out a process where participants can create an additional attribute code, and the Authority can only decline to update the format with this new code if another code for the same process already exists.
- 4.31 In consideration of the EIEP14A now being a regulated format, we have not included this process in the proposed formats. This is to support the objectives of the EIEP14A which is to provide a standardised protocol for the purpose of exchanging product information.
- 4.32 We will continue to utilise standard processes existing in the Code to enable change requests to EIEP formats. Any participant may propose a change to the business requirements, formats, reports, or any other part of an EIEP file (e.g., add or change fields) by submitting a change proposal form (or equivalent form) to the Authority. Where an EIEP is regulated by the Code, any changes will need to go through the amendment process set out in the Code.

Q9. Do you agree with the proposal to modify the business requirement to provide the Authority a right of decline to any requests for additional attributes.

5 Costs and benefits of the new EIEP14A

- 5.1 The proposed introduction of a new EIEP is not a Code amendment in itself so we are not required to complete a regulatory statement (which includes an analysis of the objectives and costs and benefits). However, in this case the Authority considers that it is useful to have regard to the objectives, benefits, and costs of the proposed EIEP and to get feedback on those.

Objectives of the proposed EIEP14A and the suite of EIEP14s

- 5.2 The objective of the proposed EIEP14A is to improve access to electricity product data – in a more consistent, reliable and usable format – so it supports consumer understanding, comparison and switching. EIEP14A would work with the wider suite of EIEP14 protocols to:
- (a) ensure consumers and authorised third-party service providers have access to up-to-date and accurate information about a retailer’s generally available plans and active legacy plans,
 - (b) provide a standardised, regulated protocol for exchanging electricity product information reducing inconsistent one-off formats and inconsistency in interpretations, and
 - (c) support a mechanism where pricing plans can be uniquely identified by consumers, retailers, and third-party service providers to enable clearer plan comparison and switching.

Q10. Do you agree with the objective of EIEP14A as describe above? If not, why not?

Q11. Do you agree that the Authority’s proposals meet these objectives?

Proposed criteria for assessing benefits and costs

- 5.3 To assess the benefits and costs of the proposed EIEP14A, we have adapted the qualitative assessment criteria used in our October Code consultation. We have added flexibility as a criterion to reflect the need for the format to accommodate different retailer tariff structures while still producing consistent, comparable information.
- 5.4 The proposed criteria are:
- (a) **Flexibility** – the extent to which the format allows retailers to reflect their tariff structures (including nationwide and network-specific plans) while still using consistent structures needed for interoperability.
 - (b) **Effectiveness** – the extent to which the format delivers product data that is accurate, timely and complete for consumers and third-party providers.
 - (c) **Efficiency and proportionality** – whether the expected consumer and market benefits justify the cost of implementation, ongoing compliance and system change.
 - (d) **Feasibility and implementation risk** – the practicality of implementation within a reasonable timeframe and operational impacts.
 - (e) **Innovation and future proofing** – the degree to which the option enables innovation rather than stifling it, and remains adaptable to emerging technologies, business models, and consumer needs.
 - (f) **Data quality and reliability** – the extent to which the format safeguards the accuracy, consistency, and reliability of data across providers.

- (g) **Strategic and international alignment** – the degree to which the option aligns with broader reforms such as digitalisation, decentralisation, consumer mobility and electricity consumer data right, and is consistent with international best practice.

The benefits of the proposed EIEP14A are expected to outweigh the costs

- 5.5 Overall, we consider that the benefits of our preferred option for the new proposed EIEP14A outweigh its costs. The benefits are strongest for the Authority's preferred option (Option 1), but several benefits apply to both options compared with the status quo.

Benefits of the Authority's preferred option (Option 1)

- 5.6 The Authority's preferred option (Option 1) is expected to deliver the following benefits against the criteria above:
- (a) **Flexibility** – Supports both fine-grained (per network/per region) and more generic plan representation, while making the logical tariff structure clear.
 - (b) **Effectiveness, data quality and reliability** – The introduction of Tariff Types and Tariff Regions supports a more structured representation reducing risks for errors and anomalies in the representation.
 - (c) **Efficiency and proportionality** – reduces repetition for retailers whose tariffs apply across multiple networks and metering configurations, and supports more efficient downstream processing for comparison/switching providers.

Benefits common to both options

- 5.7 We consider that both options proposed would deliver benefits relative to the current EIEP14, including:
- (a) **Data quality, effectiveness and reliability:**
 - (i) Decoupling attributes and schedules ensure that these are specified consistently within the elements to which they apply.
 - (ii) Clarifying the direction towards UTF-8 and allowing its use by agreement for Retailer brand names helps the industry to represent Te Reo Māori names accurately.
 - (iii) Rigorous specification of the JSON form will allow automated conformance testing by the producers and consumers of the data.
 - (b) **Innovation and future proofing:**
 - (i) clear consistent information exchange lowers barriers for innovators to build new tools and services, and improvements to the structure supports representation of new plans and product offerings that the market may deliver in the future.
 - (ii) Promoting the JSON form and associated data representation changes will also future-proof the standard for real-time API-based exchange.

- 5.8 Over time, as retailers and third-party providers adopt the suite of EIEP14s, we expect benefits to increase over time through reduced rework, fewer bespoke integrations and improved consumer-facing tools.

Costs

- 5.9 We expect the main costs of implementing EIEP14A to be:
- (a) **System change and implementation costs** – Retailers and third parties will need to update their systems and processes to comply with the EIEP14A requirements.

- (b) **Operational and compliance costs** – retailers will need internal controls to ensure that EIEP14A protocols are complete, accurate and produced within required timeframes.

Q12. Have we identified all the main costs and benefits? If not, what are we missing?

Q13. Do you agree the benefits of the proposed EIEP14A outweigh its costs? If not, why not?

The proposed EIEP14A is preferred to other options

- 5.10 The Authority developed the two options presented in this paper in response to feedback from both retailers and third parties and supported through workshops and engagement, that the current voluntary EIEP14 is cumbersome to implement and interpret, and has not been consistently adopted across the market.
- 5.11 The alternative to these options presented would be continue using the existing EIEP14 to share product information. This would be undesirable as it would continue to produce inconsistent information, increase integration costs for third parties and continue to limit the reliability of comparison and switching services.
- 5.12 Our preferred option for EIEP14A intends to ensure product information is being exchanged in a consistent manner that can be effectively used to support consumers understand their products and help comparison with other plans on the market. Continued use of EIEP14 would limit the ability to represent existing plans, and innovative product offerings coming to market in the future.

Q14. Do you agree the proposed preferred EIEP14A is preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010.

Q15. Do you have any other comments?

Appendix A Summary of workshop feedback

The workshops provided guidance for what proposal should be presented for wider consultation

- A.1 The workshops held broadly covered:
- (a) Timeline of project, EIEP14A priority changes, and use cases
 - (b) Current EIEP14 data structure and options for change
 - (c) Attributes & schedules of plans
 - (d) EIEP14B Use case preview (compliments 14A) and Plan Identifiers
 - (e) Structure options revisited and data analysis review / recap of recommendations.
- A.2 Within these workshops, the Authority and Middleware presented several draft options to gauge what proposal would be best suited to take to a full consultation process via this paper.

Summary of feedback and matters raised via workshops

- A.3 This section provides a summary of the key discussions and matters raised from these workshops.

All use cases should be considered in the development of EIEP14A

- A.4 Attendees continued general support for the primary use case of EIEP14A to focus on empowering comparison and switching providers. Discussion did note that development of the new protocol remains conscious that other use cases exist or may arise as the industry evolves and new products and services emerge.

How a plan is defined is the core matter to understand

- A.5 Attendees highlighted it was crucial to understand was how a plan is defined, and what attributes should make part of the protocol, how the protocol should be structured, and how tariffs are represented.

The protocol should include all relevant and possibly relevant plan attributes

- A.6 Attendees requested where possible, to futureproof EIEP14A by having the standard ask for information that may become relevant in the future. This included inserting plan attributes such as payment method used, whether a connection has multiple trader relationships, whether conditions are triggered by usage for a certain period, and allowance for identifying volume-based step tariffs.

Registry could be utilised to hold more information

- A.7 Attendees commented there is opportunity for the Registry to hold information proposed in the scope of EIEP14A to have this information stored centrally as opposed to being provided upon request.

Product Identification code

- A.8 Much discussion was had on the proposed introduction of a product identification code.

Product identification codes should be consumer centric

- A.9 Attendees highlighted that the desired outcome of a product identification code would be to enable a consumer to understand what plans are available to them, and to identify what plan they are on currently.
- A.10 Attendees raised a desire that if a unique plan identifier is a proposed component of the EIEP14 redesign, it should support consumers confidently identifying what plan they are on, or to what extent there are caveats. This was noted as crucial to enable accurate comparison.

Suggestion of having both an EIEP compliant version, and a consumer facing version

- A.11 One suggestion raised was whether for the purposes of EIEP14A, a product identification code followed a prescribed form set out by the Authority, that was then linked to a more consumer friendly ID available for consumer use (such as appearing on bills or inputting into online tools).
- A.12 Consumers who are customers of the same advertised product, don't necessarily pay the same tariffs or receive the same discounts
- A.13 It was highlighted that a product featuring a single plan name may be deployed/advertised across the country but have differing plan properties that impact the price a consumer pays. Reasons for this included the region the customer resided in, special discounts or terms offered to any one customer, and time of sign-up affecting price increase schedules.⁷

Not all retail brands have participant codes

- A.14 A core suggestion for how a product identification code could be prescribed included use of the relevant retail brands' participant Code as an insert.
- A.15 Attendees raised that not all retail brands who service customers directly are registered participants under the Code. Any guidance or prescribing of how a product identification code is formulated must recognise this to avoid creating an inability to comply.
- A.16 Attendees warned against the idea of having a non-participant retail brand utilise the participant Code of the Trader party they hold a relationship with to work around their non-participant status. Attendees noted that this may cause confusion to a consumer who questions why the product identification code for their plan features terms similar to that of another brand.

Product identification code must be able to be compared

- A.17 Retailers present at the workshops commented that retailers compile their plans differently from one another. Many retailers highlighted their business processes provide multiple products under one unique plan name, and note that the name advertised would stay the same even if the underlying plan attributes changed or were different between consumers.
- A.18 This was highlighted as important to understand as to ensure consumers wanting to input their product identification codes into comparison and switching sites, understand what limitations may be present in doing so.
- A.19 Non-retailer attendees noted that the structure of EIEP14A need not force participants into a specific approach of compiling their products or plans, but should be flexible to accommodate for the primary two makeups:

⁷ A difference in timing between two customers signing up with a power company could impact the timing in which they are individually impacted by tariff increases due to usual business cycles. This may mean that two customers on the exact same plan may be on different tariffs for short periods of time.

- (a) Many tariffs per few plans
- (b) Many plans comprised of few tariffs.

Bundling, Discounts, Fees & Commercial Terms

- A.20 Elements such as bundle offers and discounts or fees for behaviour or eligibility were raised as complexities in attempting to provide accurate information for comparing between any product offering.
- A.21 It was acknowledged that the full suite of EIEP14 (primarily EIEP14B) would provide the most accurate picture of a consumer's plan and what other plans were available to them.
- A.22 Where information was missing, comparison and switching providers would give value by providing comparison or advice alongside any caveats used in generating that advice.

Eligibility & Customer Segmentation

- A.23 Attendees highlighted the registry's use of ANZIC codes provide a partial picture of the use profile of the relevant ICP. This could create gaps for consumers who use electricity for residential purposes but are behind an ICP categorised under a non-residential purpose.
- A.24 An example discussed was a situation where a farm is connected through an ICP classified as a small-to-medium enterprise or commercial/industrial connection, but the same connection also supplies a farmhouse used as a residential dwelling. This residential use is not visible in the Registry.
- A.25 This discussion is noted as useful for how we develop the suite of EIEP14s as a whole.

Capacity of a connection may be a better criterion than average annual consumption

- A.26 Also raised was the use of consumption being a criterion relevant to whether a retailer must provide information of generally available tariffs to a consumer. This relates to whether 'consumer' captures small business consumer which is defined in the Act as "as a consumer that is not a domestic consumer and—
 - (a) that is in a class specified in regulations made under section 113A; or
 - (b) if no such regulations have been made, that consumes less than 40 MWh of electricity per year."
- A.27 It was noted that the use of this definition means some small business consumers such as irrigators commonly fall out of scope, which creates complexity for retailers attempting to comply with their requirements.
- A.28 Attendees requested consistency be applied across the various requirements on retailers, noting that while some requirements use consumption as a criterion, there has been recent consultation which looked towards the use of capacity as a scoping mechanism.

Data Formats & Presentation (CSV vs JSON)

- A.29 It was noted that a move towards JSON would recognise the growing capabilities required of an evolving industry. Moving away from a CSV format was supported with a view that a JSON environment would better support machine-to-machine interactions, and the consumer or human friendly nature of CSV should not be a priority.
- A.30 However, there was acknowledgement that this transition would be more difficult for some parties than others, and it would be worth considering whether tools be made available to support those parties. It was also understood that a JSON environment would not limit any party from converting files to CSV should that be their preference.

Data Structure and Linkage

A.31 The workshops discussed ensuring the content of the new EIEP14A can support business requirements and represent plans accurately and fairly.

The structure would not limit how plans are represented, but were assessed on efficiency

A.32 It was noted that any EIEP14A proposals put forward during the workshops would not limit a retailer representing their products. However, the proposals sought feedback as to whether any particular data structure proved more beneficial in terms of implementation or efficiency.

Appendix B Draft EIEP14A – Option 1

Appendix C Draft EIEP14A – Option 2

Appendix D Submission form

Consultation for 'Options for Revised Electricity Information Exchange Protocol – EIEP14A: Retailer product information'

Submitter	
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Questions	Comments
Q1. Do you agree with our preferred option (Option 1)?	
Q2. Do you agree with the structural changes we propose for both options? If not, please explain why?	
Q3. Are there any other structural changes you consider necessary to support the protocol achieve its objective?	
Q4. Do you agree with our proposal to adopt the ISO 8601 date and date-time formats? Do you foresee this adoption impacting your use of other EIEPs in any way?	
Q5. Have we identified all the required attributes to be added? If not, what are we missing?	
Q6. Do you agree with the attributes we propose to introduce into EIEP14A? If not, please identify which attributes and explain why not, or what changes are required?	
Q7. Do you consider the protocol adequately enables representation of feed-in tariffs for different generation types?	
Q8. Do you agree with our assessment of the limitation of EIEP14A to represent aspects of electricity plans with undisclosed values? Do you believe this limitation is adequately offset for the reasons outlined above? If not, please explain why.	
Q9. Do you agree with the proposal to modify the business requirement to provide the Authority a right of decline to any requests for additional attributes.	
Q10. Do you agree with the objective of EIEP14A as describe above? If not, why not?	
Q11. Do you agree that the Authority's proposals meet these objectives?	
Q12. Have we identified all the main costs and benefits? If not, what are we missing?	
Q13. Do you agree the benefits of the proposed EIEP14A outweigh its costs? If not, why not?	
Q14. Do you agree the proposed preferred EIEP14A is preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010.	
Q15. Do you have any other comments?	