March 23, 2026

Consumer Mobility Team
Electricity Authority
Te Mana Hiko
Wellington, New Zealand

RE: Consultation – Options for Revised Electricity Information Exchange Protocol – EIEP14A

Dear Consumer Mobility Team,

Thank you for the opportunity to provide feedback on the proposed "*EIEP14A: Retailer product information protocol*". As one of the largest third-party requestors of electricity data, we consider these processes fundamental to our business and our ability to deliver value to consumers.

The digitalisation of the electricity system is a critical priority. Looking at international benchmarks, such as the UK's **Energy Digitalisation Framework** (March 2026) or the **"Real-Time Data for Consumers" Final Rule** (December 2025), it is clear that modern energy markets require robust, machine-readable data standards. To remain competitive and innovative, New Zealand must transition away from legacy methods; the continued use of CSV files transmitted via SFTP is not a sustainable path for our industry's future.

Based on our review of the consultation paper and our experience with existing protocols, we wish to highlight several core concerns:

- **Format Ambiguity**: We are concerned that allowing optionality between JSON and CSV formats will create unnecessary overhead. To ensure efficiency and minimise implementation costs, we strongly advocate for a **JSON-only** standard.
- **Protocol Consistency**: Experience with EIEP13 has shown that optional fields and ambiguous definitions lead to significant integration challenges. The EIEP14A specification must be clearly defined to eliminate ambiguity, particularly regarding business rules and time representations.
- **Requestor Agency**: It is imperative that the requestor, rather than the data holder, has the right to specify which approved delivery format (JSON or CSV) to use, ensuring the data is immediately usable for digital services.
- **Interoperability**: A key objective must be the ability to map these product tariffs directly to EIEP13 consumption data, enabling third parties to recreate customer bills accurately.

We have provided detailed responses to the consultation questions in the attached submission form. We look forward to continuing to work with the Authority to strengthen New Zealand's retail electricity data infrastructure.

Yours sincerely,

Terry Paddy
Cortexo Limited

Appendix D Submission form

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

Submitter	Cortexo Limited

Questions	**Comments**
Q1. Do you agree with our preferred option (Option 1)?	Yes, however, the business rule 1 (in both options) is not clear enough. It should be specified that the file will be provided in JSON or CSV format, if requested. There should be no confusion about the required protocol, and it should not be up to the data holder to decide; otherwise, the requester will always need to handle both. This is an inefficient overhead for a digitalised electricity system.
Q2. Do you agree with the structural changes we propose for both options? If not, please explain why?	Yes, but we believe the format is ill-suited to CSV, and it would greatly simplify the implementation for both retailers and requestors if it were JSON-only. A free tool for viewing the files could be provided if human readability is the concern. It is also imperative that the requester be able to choose the format they wish to receive.
Q3. Are there any other structural changes you consider necessary to support the protocol in achieving its objective?	We are concerned about the ability to map tariffs to EIEP13 data, but understand that this depends on the changes to the EIEP13. The outcome of the EIEP13 & 14 data exchanges is that a customer or third party can accurately recreate the customer bill for any period.
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?	Yes. It is superior.
Q5. Have we identified all the required attributes to be added? If not, what are we missing?	No additional comment
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?	Yes
Q7. Do you consider the protocol adequately enables representation of feed-in tariffs for different generation types?	No additional comment

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.	Yes, we agree that it will limit retailers from representing aspects of plans where attributes have not been defined; however, this could be managed through a defined and published process for adding new attribute values.
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.	Yes
Q10. Do you agree with the objective of EIEP14A as describe above? If not, why not?	Yes, we strongly believe that data needs to be as comparable between retailers as possible, and formats should have as few options as possible and be strictly defined to minimise the effort for both producing and consuming them
Q11. Do you agree that the Authority's proposals meet these objectives?	Yes
Q12. Have we identified all the main costs and benefits? It's not, what are we missing?	No comment
Q13. Do you agree the benefits of the proposed EIEP14A outweigh its costs? If not, why not?	Yes
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.	JSON Only
Q15. Do you have any other comments?	The formats should remove as much ambiguity as possible. We have seen with the EIEP13 that when there is an option of required or not, it increases complexity drastically. Specifically, the handling of 'daylight saving' has been very problematic. The specification should require all times to be represented as daylight saving/wall clock time to reduce parsing complexity and the inaccuracy of file creation.