Appendix D Submission form

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

Submitter	Energy Brain New Zealand

Questions	**Comments**
Q1. Do you agree with our preferred option (Option 1)?	No. We support **Option 2**.
Q2. Do you agree with the structural changes we propose for both options? If not, please explain why?	Yes
Q3. Are there any other structural changes you consider necessary to support the protocol achieve its objective?	To fully accommodate wholesale-indexed retail models, we recommend: **1. Explicit support for formula-based tariffs** Option 2's Tariff and Schedule structure should explicitly permit: • Rates defined as a formula (e.g., Wholesale Node Price + Retail Margin) • Reference to a wholesale pricing source (nodal or regional) Currently the structure appears rate-field oriented. Allowing formula references would better support innovative pricing. **2. Clear identification of pass-through components** Where Network charges, levies or metering are passed through at cost, a tariff-level indicator should allow: • PASS_THROUGH_COMPONENT = TRUE • Optional component categorisation This improves transparency for consumer tools and comparison services.
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
Q5. Have we identified all the required attributes to be added? If not, what are we missing?	The proposed attribute structure is comprehensive. However, we recommend consideration of additional optional attributes: • SPOT_INDEXED_PRICING • WHOLESALE_REFERENCE_NODE • PASS_THROUGH_NETWORK_CHARGES • PASS_THROUGH_LEVIES These would enhance transparency without increasing structural burden.
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. We particularly support attributes relating to: • MULTIPLE_TRADERS_ALLOWED • GENERATION_ONLY • ELECTRIC_VEHICLE_PLAN • BATTERY_STORAGE_PLAN • SOLAR_GENERATION_PLAN These enable modern distributed energy and flexibility models. Option 2's decoupled attribute lists are an appropriate mechanism to support this.
Q7. Do you consider the protocol adequately enables representation of feed-in tariffs for different generation types?	Option 2's structure appears capable of representing export tariffs across generation types. However, it should explicitly allow:

	• Time-varying export schedules • Export pricing linked to wholesale market prices This will future-proof the schema for dynamic distributed energy participation.
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.	We agree that EIEP14A should not attempt to monetise bundled or behavioural incentives. For wholesale pass-through models, transparent cost-reflective pricing is more important than estimated bundled values. The limitation is proportionate and consistent with the modular EIEP14 suite.
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
Q11. Do you agree that the Authority's proposals meet these objectives?	Yes — **Option 2 does so proportionately.** It improves clarity and structure without imposing the additional complexity embedded in Option 1. For innovative and wholesale-indexed retailers, structural simplicity supports competition and lowers barriers to entry.
Q12. Have we identified all the main costs and benefits? It not, what are we missing?	**Benefits:** • Improved machine readability and API readiness • Reduced ambiguity in tariff/network relationships • Better support for nationwide and multi-network plans • Lower structural complexity relative to Option 1 **Costs:** • System updates for JSON compliance • Transitional mapping from existing EIEP14 structures These costs are manageable and proportionate.
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.	Yes
Q15. Do you have any other comments?	As retail innovation evolves — including wholesale pass-through pricing and flexibility integration — EIEP14A should remain structurally simple, interoperable and formula-capable. Option 2 provides a strong foundation, provided explicit allowance is made for wholesale-referenced and dynamic tariff structures.