

18 November 2025

Electricity Authority  
PO Box 10041  
Wellington  
By email: [retaildata@ea.govt.nz](mailto:retaildata@ea.govt.nz)

## **SUBMISSION: AMENDMENTS TO IMPROVE ACCESS TO ELECTRICITY PRODUCT DATA**

### **1. Introduction**

Thank you for the opportunity to make a submission on the 'Proposed Code amendments to improve access to electricity product data' consultation paper.

This submission is from Consumer NZ, an independent, non-profit organisation dedicated to championing and empowering consumers in Aotearoa. Consumer NZ has a reputation for being fair and impartial and providing comprehensive consumer information and advice.

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### **2. Comments on the consultation in general**

Consumer NZ strongly supports reforms that improve transparency, enable effective plan comparison and make it easier for consumers to switch to more competitive electricity offers.

We consider the Electricity Authority's proposals to be a positive step toward reducing information barriers in the retail electricity market. Our responses to the specific questions are provided in the attached Appendix B.

In summary, we support the introduction of a unique product identifier code system and the broader changes to improve data access, subject to implementation time frames being realistic and safeguards being put in place to avoid unintended consumer harm. In our view, the benefits of these amendments will outweigh the costs, particularly by enabling both greater consumer engagement and competitive pressure on retailers.

We thank the Authority for its continued work to ensure consumers can confidently navigate the electricity market and make informed choices about their electricity plans.

Please contact us if you would like to discuss any aspect of our submission.

*ENDS*

## Appendix B

<b>Submitter</b>	Consumer New Zealand
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<b>Questions</b>	<b>Comments</b>
Q1. Do you agree with the Authority's proposal to combine the proposed EIEP14A and EIEP14B? If not, why not?	We agree.
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?	We agree.
Q3. Do you have any suggestions for how the product identifier code system could be implemented?	<p>Yes. To ensure the product identifier code system delivers on its core purpose – supporting transparency, comparability and informed consumer choice – we recommend that retailers be required to generate their product codes in accordance with a mandatory, standardised naming and formatting protocol.</p> <p>Standardisation is essential to avoid retailer-specific naming conventions that obscure meaningful comparison and undermine competitive pressure.</p> <p>These protocols should be developed through Authority-facilitated industry workshops, with input from retailers, consumer representatives and independent experts.</p> <p>Once established, the naming and coding protocols should be published as an industry standard and incorporated into the relevant code obligations.</p>
Q4. How could product identifier codes be included on electricity bills such that they can be utilised by everyday consumers?	<p>For product identifier codes to be meaningful and accessible to everyday consumers, they must be displayed on bills in a format that is both human- and machine-readable. It is critical to support manual use by consumers and call-centre operators, as well as automated capture by comparison tools and bill-reading technology.</p> <p>We recommend that the Authority require retailers to do the following.</p> <ol style="list-style-type: none"> <li>1. Display the product identifier code prominently on the front page of every bill, in a clearly labelled and consistently located section. Placement should support immediate recognition without requiring consumers to search through multiple pages or technical billing data.</li> <li>2. Provide the code in a plain-text alphanumeric form that consumers can easily enter into comparison websites or switching services or provide verbally when seeking advice from a call centre or consumer support agency.</li> <li>3. Provide the code in a machine-readable format, such as a standardised data field and/or</li> </ol>

	<p>embedded QR code or barcode, so that consumer tools and third-party bill readers can automatically extract it to match plans and pricing information accurately.</p> <p>To be effective, the product identifier code must not be buried in technical billing information. It must be visible, understandable and usable by real consumers in real switching journeys.</p>
<p>Q5. Do you agree with the Authority's proposed staged approach to designing and implementing EIEP14s? If not, why not?</p>	<p>The proposed staged approach appears sensible in principle as it allows for iterative design and testing. However, the proposed time frames may not be practical, particularly given the upcoming holiday period, and it is unclear whether retailer systems can accommodate the required changes within this schedule. We defer to retailers to comment on their operational capacity.</p> <p>While we support resolving the issues quickly, implementing EIEP14s under a compressed time frame carries the risk of unintended consumer harm. Retailers may manage compliance risk by withdrawing offers or moving customers on legacy plans to higher-priced products faster than would otherwise occur. In this scenario, a measure intended to benefit consumers could inadvertently disadvantage a significant segment of the market.</p> <p>We therefore encourage the Authority to ensure time frames are realistic and account for practical system limitations and potential unintended consequences so that the staged approach genuinely supports consumer interests.</p>
<p>Q6. Do you agree with a Code amendment extending existing requirements on retailers in 11.32G to provide product information upon request?</p>	<p>We agree with extending these requirements but caution that there is potential for additional costs and inefficiencies if third parties submit frequent, periodic requests to track pricing changes. In practice, pricing changes are infrequent, and repeated formal requests can place an unnecessary administrative burden on retailers without delivering benefits to the consumer.</p> <p>Our experience indicates that a more effective approach would be to foster collaborative relationships with retailers, whereby they proactively notify third parties of pricing changes. This approach is more efficient, reduces duplication and ensures consumers receive timely and accurate information.</p> <p>As noted in our previous submission, third parties, such as ourselves, already have established systems and arrangements with retailers to monitor pricing. In this context, the proposed amendments would function as a backstop, ensuring access to product information in cases of non-cooperation rather than creating a primary mechanism for routine monitoring.</p>
<p>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?</p>	<p>We agree with this proposal in principle, as removing such charges improves transparency and access to information for consumers. However, there should be safeguards to prevent misuse, such as, excessive or frivolous requests or requests that impose disproportionately high costs on retailers, which ultimately would be borne by consumers.</p>

	<p>We also note that some current or future retailer offers may not conform to prescribed formats. The Authority should consider how to manage these exceptions in a way that maintains consumers' access without creating an undue administrative or financial burden for retailers.</p>
<p>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?</p>	<p>We agree.</p>
<p>Q9. Do you agree with a Code amendment requiring retailers to associate their retail electricity plans with product identifier codes? If not, why not?</p>	<p>We agree.</p>
<p>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?</p>	<p>We consider it preferable for the details of the product identifier code system to be set out in a standalone guidance document rather than embedded directly within the code. Embedding the system in the code could make it unwieldy and less practical for day-to-day use by retailers and other stakeholders.</p> <p>A guidance document would allow the Authority to provide clear, detailed instructions on implementation, while remaining flexible enough to accommodate updates or refinements as the market evolves. This approach supports both operational efficiency and consistency, ultimately benefiting consumers by ensuring the system is practical, transparent and easy to apply.</p>
<p>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?</p>	<p>We agree.</p>
<p>Q12. Do you agree with our refined proposed assessment criteria?</p>	<p>No comment.</p>
<p>Q13. Do you agree with the Authority's preliminary assessment that the proposal is better than the status quo? If not, why not?</p>	<p>We agree. The proposal is better than the status quo.</p>
<p>Q14. Do you agree with the objectives of the proposed amendment? If not, why not?</p>	<p>We agree.</p>
<p>Q15. Do you agree with the Authority's preliminary assessment that the benefits outweigh the costs? If not, why not?</p>	<p>Yes, we agree. We consider that the benefits of implementing a product identifier code will outweigh the costs. Improving the comparability of electricity products will make it easier for households to understand their options and switch to better-value plans. This increased ease of switching is likely to generate tangible savings for consumers, while also strengthening competitive pressure in the market.</p>

Q16. Do you agree that the proposal promotes the Authority's statutory objectives? If not, why not?

We agree.