

24 June 2026

Submissions
Electricity Authority

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

Improving product and consumption information exchange - proposals for new and updated standards

Meridian appreciates the opportunity to provide feedback on the Authority's consultation on EIEP14B and associated amendments to EIEP13A and EIEP13B.

We support the Authority's intent to improve the accessibility, consistency and timeliness of information exchange across the retail market. Our comments focus on overall implementation impacts, timing considerations, and areas where further clarification would support consistent and efficient delivery.

- We note that the timing for the introduction of EIEP14B, together with the proposed amendments to EIEP13A and EIEP13B, have been timed to sit alongside other ongoing regulatory initiatives (including Better Billing and EIEP14A), which collectively require substantial system and process changes.
- We consider it critical that the Authority takes a coordinated approach to timing across these workstreams. Retailers are already facing multiple compliance deliverables within similar timeframes. Further obligations should be sequenced in a way that is achievable, minimises costs and delivery risk.
- As with other data exchange protocols, it may not be possible to guarantee that all information is accurate at all times, particularly where it is dependent on upstream

systems or frequent updates. We consider it important that expectations on accuracy, materiality and correction processes are clearly defined and proportionate.

- Meridian would welcome further detail on:
 - Consultation and decision timeframes for EIEP14C and changes to EIEP13C which are expected to have an implementation date of 30 October 2026.
 - Consideration of how Product Identification Code updates/price changes are applied to EIEP14B.
 - Guidance on data governance, including error correction.

Meridian remains supportive of the Authority's objectives and is happy to engage further to discuss implementation considerations and practical design aspects.

Responses to the Authority's consultation questions are appended.

Please contact me if you have any queries regarding this submission.

Nāku noa, nā

Sarah Beri
Pricing Revenue Lead

Responses to consultation questions

Questions	Comments
Q1. Do you agree that the proposed EIEP14B is consistent with the now prescribed EIEP14A? (If not, what further changes are required to achieve consistency?)	Agree.
Q2. Is the proposed EIEP14B design suitable to enable customers, or agents acting on their behalf, to acquire specific, accurate, unambiguous information on their electricity plan?	The proposed EIEP14B adequately supports the exchange of current plan information for residential and small business customers.
Q3. What additional changes to attributes, structure or content, if any, do you recommend to the proposed EIEP14B to achieve the above objective?	The consultation states “In cases where a scheduled future tariff rate change applies to the customer’s plan, both current and future tariffs must be specified with applicable start and end date elements”. Where there are multiple variations of pricing within a plan a new product identification code will be required for each version. It’s unclear from the examples provided how the proposed structure supports this scenario. The format requires the “Retailer participant identifier” to be provided. We believe this may be referencing the identifier for the retailer’s brand.
Q4. Do you agree with the proposal not to include customer-specific attributes such as contact, meter configuration or billing information in EIEP14B, reflecting discussion at industry workshops?	The format proposed has sufficient detail.
Q5. Do you agree with the proposed key names within JSON objects in the EIEP13A and EIEP13B updates?	We broadly support the proposed key names.
Q6. Do you agree with the proposal to minimise product information in the EIEP13 formats (such as making tariff name optional), reserving product information for the EIEP14 formats?	We support the proposal to minimise product information in the EIEP13 formats and reserve this information for the EIEP14 formats. This should provide clearer separation of purpose between the formats, reduce duplication, and support more consistent product information management.
Q7. Do the amendments to the Consumer Authorisation Code field clarify its use? If not, what further changes would provide clarification (eg would it be preferable to rename this field)?	This is difficult to assess pending consultation on, and release of, any proposed updates to EIEP14C requirements.
Q8. Do the proposed updates adequately future-proof EIEP13A and EIEP13B so they provide sufficient information for foreseeable use cases?	The updates seem adequate for current and foreseeable use cases but may require further refinement over time. It is assumed that relevant changes to the EIEP13C will be made to support the updates.
Q9. Does the way we have specified the meter channel and register content codes in EIEP13A, maintain consistency across EIEP13A, EIEP14B and the Registry information for the consumer’s ICP?	Consistency appears to have been maintained.
Q10. Do you agree with the Authority’s conclusion that, assessed against the criteria described in section 5.3 of the consultation paper, the proposals for the new EIEP14B and modernised EIEP13A and EIEP13B format will collectively support informed consumer choice by enabling more accurate and consistent plan comparison and a more efficient and competitive market?	We broadly agree that the proposed formats are intended to support informed consumer choice through more accurate and consistent plan comparison. However, the extent to which EIEP14B will deliver material additional value to mass market customers, over and above the availability of EIEP14A and product identification codes, remains unclear.
Q11. Do you have further comment on whether the EIEP14B format proposals and EIEP13A and EIEP13B updates support informed consumer choice? Do they equip a third party, for example a (non-technical) budget advisor, with sufficient information to advise a	User testing would be required to understand how well suited the proposed formats are for non-technical budget advisors.

consumer on their best plan options? If not, what would you change?	
Q12. Do you agree with the way that we have specified how gaps in the data should be displayed? For example, where there is a non-communicating period, resulting in a gap in half-hourly data.	It is not explicitly specified how gaps should be displayed. The ability to provide estimated readings as well as actual reading enables us to provide customers with transparent information on their usage based on information held. Information is provided in good faith based on the data available at the time of the request. It is assumed that subsequent corrections to historical data should not require notification to the requester, given the administrative burden and limited benefit.
Q13. While noting that the primary use case is to support residential and small business information exchange, do you propose any additional changes to accommodate the needs of commercial and industrial users?	The proposed format does not adequately accommodate the needs of commercial and industrial customers, given the complexity of their product offerings and contractual arrangements.
Q14. Do you have any other comments on the Authority's proposals for EIEP14B, EIEP13A and EIEP13B?	A considerable amount of work is already underway to implement the Better Billing decision made earlier this year. The addition of further compliance requirements for 30 October, which are only now being consulted on, creates additional cost and delivery pressure for retailers. The timing of this consultation, particularly following the workshops, appears late and adds to existing implementation commitments. This is especially relevant given that EIEP14B is dependent on EIEP14C, which is expected to establish the underlying machine-to-machine protocol for API-enabled, on-demand data exchange. Greater clarity on the anticipated consultation and decision timing for EIEP14C would therefore be valuable, given the overlap with EIEP14B implementation and the associated delivery dependencies. Other technical notes: For EIEP13 the application of ISO 8601 is beneficial, although clarity would be enhanced by requiring all timestamps to be provided in a consistent UTC format. EIEP13C will need to be updated as requestors currently have no mechanism to request kVarh (contained in EIEP13B) and identified as mandatory in the proposal.