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Submissions Electricity Authority P O Box 10 041 Wellington 6143

By email: submissions@ea.govt.nz

Dear Sir / Madam,

RE: Consultation Paper— Retail data project: a file format for exchanging generally available retail tariff plan data

Pioneer appreciates the opportunity to make submissions on the Electricity Authority's proposed data transfer format for retail tariff information – EIEP14.

We appreciate the work undertaken by the technical working group and the Standing Data Format Group to produce this standard format. Pioneer supports the introduction of a standard format. We also support more standardisation of the terms and definitions used in distributor and retailer tariffs which would reduce the complexity of comparing tariffs. We have not tested whether we can extract the information proposed in EIEP14 from our accounting system and so have no indication of the cost of setting up this data transfer.

The EIEP14 format and output is complicated and, in our view, could only be expected to be of use to organisations in the business of providing price advice as opposed to individual consumers. We note the comment in the consultation paper:

"An EIEP 14 formatted file is essentially a highly structured plain text file but would not be particularly human readable without subsequent electronic data processing." (para 3.3.2)

Improving access to data for price comparisons has also been a focus in the UK. However, we note that the UK equivalent of the Commerce Commission is currently investigating if companies offering price comparisons are acting anti-competitively¹.

Yours sincerely

Fraser Jonker Chief Executive

 $^{^1\,} See\ \underline{https://www.gov.uk/cma-cases/energy-price-comparison-websites-suspected-anti-competitive-agreements}$