

Response to independent assessment 2022/23

21 November 2023

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1. Introduction

- 1.1 Each year the Electricity Authority Te Mana Hiko (Authority) measures its performance, the progress made in advancing its statutory objectives, and how well it is delivering against its strategy.
- 1.2 This document summarises the high-level findings from the 2022/23 independent assessment of the Authority's four impact measures for three of its strategic ambitions (consumer centricity, trust and confidence and low-emissions energy). It includes the salient themes raised in the assessment and our response.
- 1.3 The Authority commissioned MartinJenkins to conduct the assessment of the Authority's performance in 2022/23. This included desk research, a review of documents from 1 July 2022 to 30 June 2023, and interviews with Authority staff. The results were used with other research methods to assess the Authority's performance measures for its [Annual Report 2022/23](#).

2. Results summary

- 2.1 Overall, the Authority achieved a very good result across the four impact measures for its strategic ambitions, scoring an average of 4.2 out of 5.
- 2.2 We scored higher on engaging consumers in our decision making (measure 2) and enabling low-emissions energy (measure 4) than in 2021/22, but lower on decisions that meet consumers' needs (measure 1) and promoting trust and confidence (measure 3).

Measure #	Ambition	Impact	Measure	2020/21	2021/22	2022/23
1	Consumer centricity	Our decisions improve the way the sector meets consumers' needs	Assessment of the quality of our decision-making processes on meeting consumers' needs	3.9	4.25	4.1
2	Consumer centricity	Consumers are engaged with through our decision-making processes	Assessment of the quality of our engagement with consumers in our decision-making processes	3.7	4.1	4.3
3	Trust and confidence	The Electricity Authority and our actions promote trust and confidence	Assessment of the quality of material produced (eg, EMI reports, thought pieces)	4.2	4.2	3.9
4	Low-emissions energy	Our electricity market settings enable an efficient transition to reliable low-emissions energy in New Zealand	Assessment of the ability of market settings to facilitate an efficient transition to low-emissions energy	-	4.2	4.3

3. Opportunities identified for the Authority

Developing a suite of engagement approaches which balance rapid and deliberate responsiveness

- 3.1 MartinJenkins identified that the Authority has moved from a deliberate and cautious approach to stakeholder engagement becoming more organic and ad-hoc. This change was in response to the need to be more agile given the rapidly changing nature of the electricity sector.
- 3.2 They suggested that the Authority devise a more structured and deliberate set of engagement options, for this new environment. This would give us a more considered and consistent set of tools for the different types of scenarios we encounter, from requiring rapid responses through to more considered and deliberative analysis.

Our response

- 3.3 We acknowledge that there is work to do on improving our stakeholder engagement. This has been a major focus for our new Chief Executive, Sarah Gillies in her first year in her role.
- 3.4 In March 2023 the Authority developed a communications and engagement strategy including an annual plan to build trust and confidence in the Authority. Martin Jenkins was not aware of this when it prepared its report.
- 3.5 Included in this is a focus on improving stakeholder engagement practice across the Authority with an initial focus on:
 - (a) dedicating resource to stakeholder engagement through our Stakeholder Engagement Advisor who is responsible for supporting teams across the Authority
 - (b) mapping key stakeholders and assigning relationship responsibilities across the senior leadership team
 - (c) supporting the Board and senior leadership team with a planned annual engagement calendar targeting existing and emerging stakeholders
 - (d) implementing a consultation calendar so that stakeholders are aware of upcoming engagement opportunities
 - (e) supporting policy teams with a consistent approach to stakeholder engagement through stakeholder mapping and engagement activities
 - (f) quarterly updates for stakeholders presented by our Chief Executive and staff (first one held in October 2023).
- 3.6 We note the issue raised by Martin Jenkins around our 'Options to promote consumers interest through Winter 2023'. In this instance consultation was rapid so that the options could be implemented in time before winter 2023. This was important to support security of supply over winter 2023. The Authority advised stakeholders in advance of the upcoming consultation to help enable them to be able to respond in a short timeframe.
- 3.7 We are beginning to see the positive impact of our communications and engagement strategy. Our recent consultation on the Consumer Care Guidelines included the option of providing feedback by survey. Our engagement approach resulted in 1000 survey responses and 100 written submissions.

Increasing the accessibility of educational resources

- 3.8 MartinJenkins notes that the Authority has significantly improved our role as an educator in the electricity industry through the educational resources published on our website. However, they also identified several opportunities where we could have demonstrated the links between our growing library of resources to make the content more digestible. They specifically identified an opportunity for our communications team to curate our repository of articles and before new content is published, find opportunities to link through to and leverage the available resources.

Our response

- 3.9 A key focus of publishing content through the new website is connecting relevant material so the user can navigate to areas of interest more readily. This is in place now including our amended approach to our weekly e-newsletter Market Brief which drives audiences to our website where we have more consumer-centric news items. In addition, the Authority has implemented plain language training across the organisation to support improved accessibility of what can be complex material.

Developing an evidence base to understand consumers

- 3.10 MartinJenkins noted that the Authority has made significant positive steps in improving engagement with domestic consumers. However, there were times where the Authority “reaches conclusions about the attitudes and risk appetites of consumers”. MartinJenkins suggested the Authority could gain valuable evidential input through having an evidence base from focus groups or surveys.

Our response

- 3.11 The Authority is already exploring ways to obtain qualitative and quantitative data about the varying experiences and preferences of consumers. We are also working with others with the explicit mandate of researching consumers to capture those insights in our decision-making processes. For example, with a memorandum of understanding with the Consumer Advocacy Council, one of the organisations charged with gathering research on consumers.
- 3.12 We are also implementing different ways of engaging with all consumers to capture diverse consumer voices throughout our consultation processes. For example, consultation on the Consumer Care Guidelines seeks to extend input through an online survey, online briefings and opportunities for verbal submissions as well as the standard written submission process.

Increasing transparency around delays

- 3.13 Some areas of the Authority’s work have experienced delays due to the need to prioritise resources. However, delays were not always clearly communicated to stakeholders impacted by projects. MartinJenkins suggested improving our processes to inform stakeholders of shifting timeframes, which would also improve trust and confidence.

Our response

- 3.14 We acknowledge that when developing the new option for using the Electricity Information Exchange Protocol 5 we did not adequately communicate with

stakeholders about the work restarting. We notified that the project would be delayed in the first instance due to our focus on the Electricity Price Review. Unfortunately further delays occurred because of the Covid-19 pandemic.

- 3.15 The Authority is focused on increasing transparency of our projects, processes and indicative timeframes. Authority teams are continuously improving the way they work together so that stakeholders are aware of all critical parts of a project, including any delays.
- 3.16 To ensure that stakeholders are aware of project timelines changing, we will produce regular updates on the progress of our Annual corporate plan and other projects that we have underway, and regularly update the consultation calendar. These measures will help inform stakeholders about the status of our work programme.

Mitigating under-resourcing risks for statutory functions

- 3.17 MartinJenkins found that communication about one of our compliance investigations did not meet expectations. They noted that transparency in regulatory enforcement is critical and failing to be transparent risks undermining trust and confidence.
- 3.18 In assessing this investigation, they also noted that there was a delay in the investigation due to under-resourcing and competing priorities, with no evidence of communication with the involved parties to explain the delay. They suggested that we needed adequate resources to respond to compliance issues in a more responsive manner and have written processes to ensure parties are communicated with adequately.

Our response

- 3.19 We accept that in this case we failed to maintain communication with participants to keep them informed of the fact-finding delay. We complied with the obligation to send a regulation 16 notice to the party allegedly in breach. However, in this case we did not include the regulation 16 notice on our website along with the regulation 17 notice. We acknowledge this oversight. In context this was only one of several investigations the Authority has undertaken in recent years where both notices were not published together.
- 3.20 We consider any impact on the Authority's trust and confidence as a regulator to be minor because we have complied with the regulations by publishing the section 17 notice which has the same content.
- 3.21 We have updated our staff "Compliance Manual" to clarify that both regulation 16 and regulation 17 notices should be published together and to remind our investigators that parties should be kept informed as a case progresses.
- 3.22 Recent funding analysis has recommended the Compliance team be better resourced to be able to cope with workload demands and complexities.
- 3.23 Under-resourcing is a known issue for the Authority. In our 2023/24 levy-funded appropriation consultation we have outlined the need for an increase of funding to enable the Authority to catch up and keep up with the scale and pace of change required by the sector to keep the lights on make sure all New Zealanders benefit.

- 3.24 The Authority worked with the Ministry of Business, Innovation and Employment (MBIE) and Sapere on the strategic baseline review of the Authority's operations. MBIE provided the final review to the Minister in September 2023.
- 3.25 The review found that, while the Authority is currently meeting its statutory objectives, there are further opportunities to improve. It also found that "*historically the organisation has been... run on a lean budget. A result of this may be that the Authority has been somewhat reactive in its role, which must change if it is to deliver on the significant changes ahead to guide the sector through the transition to greater electrification.*"¹
- 3.26 Future funding levels were considered separate to the review. In agreement with MBIE, the Authority created a business case to address this component of the review.
- 3.27 In late 2023/early 2024, the Authority will publicly consult on its proposed funding for 2024/25. The proposed funding will allow us to keep pace with the rate of technological change required for an orderly transition to a net zero carbon future and better serve all consumers.

4. MartinJenkins report provided to the Authority

- 4.1 The remainder of this document contains MartinJenkins report to the Authority. The report details the findings of the independent assessments carried out by MartinJenkins, including observations of what the Authority currently does well and opportunities for continued improvement.

¹ Sapere, *Electricity Authority Strategic Baseline Review 2022/23 Final Report*, 29 August 2023, p. 20.

Independent assessment of Electricity Authority's impact measures

FY23
Final Report



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Preface

This report has been prepared for the Electricity Authority by Frank Quin, Sargam Shah, and Daniel Miles, from MartinJenkins (Martin, Jenkins & Associates Ltd).

For 30 years MartinJenkins has been a trusted adviser to clients in the government, private, and non-profit sectors in Aotearoa New Zealand and internationally. Our services include organisational performance, employment relations, financial and economic analysis, economic development, research and evaluation, data analytics, engagement, and public policy and regulatory systems.

We are recognised as experts in the business of government. We have worked for a wide range of public-sector organisations from both central and local government, and we also advise business and non-profit clients on engaging with government.

Kei te āwhina mātau ki te whakapai ake i a Aotearoa. We are a values-based organisation, driven by a clear purpose of helping make Aotearoa New Zealand a better place. Our firm is made up of people who are highly motivated to serve the New Zealand public, and to work on projects that make a difference.

Established in 1993, we are a privately owned New Zealand limited liability company, with offices in Wellington and Auckland. Our firm is governed by a Board made up of executive directors Kevin Jenkins, Michael Mills, Nick Davis, Allana Coulon, Richard Tait, and Sarah Baddeley, as well as independent director Sophia Gunn and chair David Prentice.



Executive summary

This report presents the findings of an independent assessment of four of the Electricity Authority's (the Authority) impact measures focused on their strategic ambitions of consumer centricity, trust and confidence and low emission's energy. We evaluated a selection of projects and documents produced by the Authority in the last financial year using an agreed assessment framework (developed by MartinJenkins for this purpose). The scope of the assessment covered the period from 1 July 2022 to 30 June 2023.

An initial long list of documents was produced by the Authority, which was shortlisted independently by us to include a total of 21 documents. In producing this shortlist, we focused on ensuring that a broad range of content was represented in the assessment.

The Electricity Authority's statutory objective is 'to promote competition in, reliable supply by, and the efficient operation of, the electricity industry for the long-term benefit of consumers.'¹

The Electricity Industry Act also sets out an additional objective 'to protect the interests of domestic consumers and small business consumers in relation to the supply of electricity to those consumers.'²

This is supplemented with strategic ambitions; consumer centricity, trust and confidence, and supporting transition to low emissions energy. The Authority also aims to foster thriving competition and innovation flourishing, although, this is out of scope for this assessment. These strategic ambitions are designed to enable the Authority to adapt to changes in its operating environment, societal shifts in Aotearoa and evolving global realities. The strategic ambitions and the statutory objective are complementary and are intended to mutually reinforce each other.

To assess the performance of underlying impact measures for their ambitions, the Authority has commissioned MartinJenkins to independently consider how well the Authority executed on the three strategic ambitions and four impact measures in scope.

Measures

Under the consumer centricity ambition, we evaluated how the Authority focuses on consumers' needs and the impact of their decision-making processes on consumers. We also assessed how the Authority increases the participation of, and engagement with, consumers in the organisation's decision-making processes. This involved consideration of two specific impact measures:

- **Measure 1:** Assessment of the quality of the Electricity Authority's decision making on meeting consumers' needs.
- **Measure 2:** Assessment of the quality of the Electricity Authority's engagement with consumers in their decision-making processes

¹ <https://www.ea.govt.nz/about-us/what-we-do/>; see also <https://www.ea.govt.nz/assets/dms-assets/28/Statement-of-Intent-2021-2025.pdf>, p.10.

² <https://www.ea.govt.nz/about-us/what-we-do/>; see also <https://www.legislation.govt.nz/act/public/2010/0116/latest/whole.html>, section 15(2).



It is important to note, in consideration of consumer centricity, that the consumers referred to are significantly broader than what a lay person might intuitively imagine as consumers. In the context of the Authority – and as defined in the Electricity Industry Act and Electricity Industry Participation Code, consumers represent any party provided electricity for consumption – including industrial processes, commercial, transport, and residential consumers.

For the trust and confidence ambition, we evaluated how the Authority’s actions promote trust and confidence. This involved consideration of a third impact measure:

- **Measure 3:** Assessment of the quality of material produced

For the low emissions energy ambition, MartinJenkins evaluated how the Authority unlocks the potential for more renewable generation and sets out a pathway for delivery of New Zealand’s 2050 net zero target. We assessed the Authority’s impact on enabling an efficient transition to reliable low-emissions energy through the fourth and final measure within our scope:

- **Measure 4:** Assessment of the ability of market settings to facilitate an efficient transition to low emissions energy.

Overview of findings

EA scored an average score of **4.2 out of 5** across the four impact measures. More specifically, they scored:

- 4.1 on the quality of decision making on meeting consumers’ needs for **consumer centricity**
- 4.3 on the quality of engagement with consumers in their decision-making processes for **consumer centricity**
- 3.9 on the quality of material produced for **trust and confidence**, and
- 4.3 on facilitating an efficient transition to low-emissions energy for **low-emissions energy**.

The Authority has received a very good rating result evidencing their efforts to embed consumer centricity in the work they do, inspire trust and confidence of industry participants, consumers, and the wider market, and in facilitating a sustainable affordable pathway to achieve a low emissions economy.

Opportunities for the Authority

Through our assessment process of document review and stakeholder engagement, we found some key opportunities for the Authority to improve against their strategic ambitions.

Developing a suite of engagement approaches which balance rapid and deliberate responsiveness

The Electricity Authority (the Authority) currently adopts an organic approach to stakeholder engagement on a project-by-project basis. Approaches include one-on-one interactions with industry participants, stakeholder



meetings, workshops and attending forums, often along with early, proactive information sharing with policy personnel to allow for better preparation times and no surprises in the industry.

In the past, the Authority mainly followed a deliberate and cautious approach, which helped maintain consistency, trust, and confidence within an industry where stable market conditions were a crucial component for instilling confidence to invest.

However, the energy market is changing more rapidly than ever, forcing the Authority to respond equally quickly to demand for electrification of vehicles or distributed generation. As a regulator in the midst of this transformation, it is crucial to develop a framework that helps collaboratively navigate these swiftly evolving areas.

We believe that the Authority should devise a deliberate set of engagement options for these different scenarios they encounter – from needing rapid responses through to and more conscious and deliberate analysis. The Authority could then match the tools they have set aside for different types of projects, rather than reacting ad-hoc.

Having a more formal framework from which they can establish the pace of engagement will ensure the Authority is set up to demonstrate agility and flexibility when required, without requiring new processes to be engineered on the fly.

Particularly for rapid turnaround work, we note there have been instances where a lack of pre-and-post engagement has raised concerns around market participants. This was visible in the work surrounding managing winter peak demand, where we received mixed views about whether market participants had sufficient information and time to consider the issues more deliberately. A clearer roadmap of upcoming issues and their relative urgency would support participants to be ready when urgent projects are released for consultation.

Increasing the accessibility of educational resources

The Authority has made significant strides in building availability of educational resources over the last year, which should be applauded. They have begun leveraging these resources through actively linking users through interconnected topics, allowing users to explore this educational content in a natural and engaging manner, for instance in [‘The forward electricity market explained’](#). This represents an impressive step forward for solidifying the Authority’s role in the industry as not only a regulator, but an educator.

There were, however, a number of missed opportunities for linking to the growing library of educational content to make other content more easily digestible, meaning these articles may not have delivered the value they otherwise could have.

To get more value from these articles, the Authority could consider setting up a process for the communications team to proactively curate the repository of educational articles and, before new content is published, find opportunities to link through to and leverage the available resources.

Developing an evidence base to understand consumers

Since last year’s assessment, there have been significant positive steps in improving engagement with domestic consumers, for instance by engaging with the Consumer Advocacy Council.



However, there have been instances where the Authority reaches conclusions around the attitudes and risk appetites of consumers, such as in [‘Electricity Authority removes requirement for distributors to make payments for avoided cost of transmission’](#) where the Authority stated that “*ACOT payments are an ineffective and expensive insurance policy that the Authority is not willing to ask New Zealand consumers to keep funding*”.

We accept it is impractical to expect the layman to engage with technical aspects of industry decisions, however this increases expectations on the Authority on issues and opportunities where an authentic and understandable engagement is possible. We think it likely that the risk appetite of consumers was one of those opportunities.

Understanding domestic consumer preferences and risk appetite does not necessarily have to be conducted as part of specific projects. There is an opportunity to engage with consumers through focus groups or surveys, to better understand preferences and behaviour, and use that as the evidence base with which the Authority can confidently speak on their behalf across a variety of projects.

For instance, there are likely different trade-off decisions for consumers around security of supply versus more economically efficient market outcomes, even if that means occasional power interruptions – and these likely differ between urban and rural, business and domestic, old and young. However, none of this is tested well and thoroughly via engagement.

Having an evidence base from focus groups or surveys would help ensure genuine consumer-centricity, and add another valuable evidential input into decision-making for the Authority.

Increasing transparency around delays

Delays occurred in the Authority’s approach to and delivery of some work due to a range of issues, many outside of the Authority’s control. One clear example of this is the nearly three-year delay of the delivery mechanism and mandatory date for the [EIEP5A decision](#). Deprioritising this project due to the COVID-19 pandemic was understandable, and the completion of it is good evidence that the Authority was still interested in completing this project when they had the capacity to do so.

We noted, however, that these delays are not always clearly communicated to stakeholders impacted by the project. In the above example, stakeholders were not advised there would be a delay and were left waiting to hear from the Authority years later. Processes to ensure stakeholders are informed of shifting timeframes would ensure ongoing engagement once the project is able to be reprioritised, and trust and confidence in the process.

Mitigating under-resourcing risks for statutory functions

We identified an issue with investigation cases in the example provided to us with the alleged code breach.

In this specific example, the investigation notice posted online did not give any information about what occurred to allegedly breach the code. When we queried this, we were directed to an internal document with more detail, but further explanation as to why none of that detail was made public in this instance was initially unable to be provided, and later suggested to be an undocumented decision made at the time. It stood in stark contrast to other examples of investigation notices on the Authority’s website, which provided at least a brief summary of alleged breaches.



Transparency in regulatory enforcement processes is critical, and failure to operate transparently and consistently risks undermining trust and confidence not just in the regulator, but in the market they regulate. Investigation notices such as these may garner interest from a much wider audience than the parties involved in the claim, and defining what happened in the case and why the investigation is occurring is vital to garner trust and confidence in the organisation by the electricity industry, investors, and the general public.

There was also a delay in the investigation due to under-resourcing and competing priorities, with no evidence of communication with the involved parties to explain this delay. Other investigations may take priority, but a three-year window to begin an investigation seems far too long, and resourcing in the team needs to adequately be able to respond to allegations in a much more responsive manner. Without a written process to ensure communication, updating involved parties has also been up to the discretion of the investigator. Open and honest communication is key to developing trust and confidence in the Electricity Authority.

Written processes and adequate resourcing are a critical risk mitigation which should be in place for the arguably most significant process in the Authority's statutory objectives, regulating the market and leading investigations thoroughly. The example we have discussed risks undermining the core trust and confidence the sector has for EA as a regulator.



Context

Our role

The Authority undertake statutory reporting on performance, the progress made in advancing their statutory objective, and how well they are delivering against their strategy. Progress made towards their statutory objectives is measured using outcome measures, and progress made towards their strategic ambitions is measured using impact measures.

MartinJenkins have been commissioned to assess the Authority's impact measures through an independent qualitative assessment on a previously agreed upon data matrix and assessment rubric to assign each measure a 1-5 rating.

We have assessed a selected range of documents to assess each ambition and drawn further insights by 9 internal and 1 external interviews. The full list of documents selected is listed in Appendix 1, and the full list of interviewees is listed in Appendix 6.

The results from the independent assessment will be integrated into the Authority's 2022/2023 annual report.

The Authority's Strategy

Five key strategic ambitions focus their work, and five key strategic capabilities underpin their success.³

Table 1: The Authority's strategic ambitions and capabilities

Strategic ambitions	Strategic capabilities
Consumer centricity	Listening and empathy
Trust and confidence	Purposeful connection
Low-emissions energy	Inspired culture
Thriving competition	Transformative mindset
Innovation flourishing	Impactful delivery

These strategic ambitions are more than aims or prioritisation tools for the Electricity Authority, they describe success and how the electricity industry can make a difference to society in Aotearoa New Zealand and to our economy and environment.

³ [Statement of Intent 2021-2025.](#)



Our approach

This evaluation is focused on three strategic ambitions: consumer centricity, trust and confidence and low emissions energy and the following measures as outlined in the Statement of Intent 2020-2025:

Table 2: Strategic ambitions and impact measures

Ambition	Impact	Evaluation assessment focus measures	
Consumer Centricity	Our decisions improve the way the sector meets consumers' needs	1	Assessment of the quality of our decision-making processes on meeting consumers' needs
	Consumers are engaged with through our decision-making processes	2	Assessment of the quality of our engagement with consumers in our decision-making processes
Trust and Confidence	The EA and our actions promote trust and confidence	3	Assessment of the quality of material produced (e.g., EMI reports, thought pieces)
Low-emissions energy	Our electricity market settings enable an efficient transition to reliable low-emissions energy in New Zealand	4	Assessment of the ability of market settings to facilitate an efficient transition to low-emissions energy

To assess these measures, each one has been broken down into a series of dimensions developed initially by MartinJenkins. Dimensions were based on those applied in the previous year's assessment, updated with some minor improvements, and finally consulted back and agreed with the Authority. No significant changes from our proposal were suggested by the Authority at any stage in that process.

Dimensions used for the assessment framework

Consumer centricity

Impact: Our decisions improve the way the sector meets consumers' needs

Measure 1: Assessment of the quality of our⁴ decision-making processes on meeting consumers' needs

- How well are the impacted consumer groups identified?

⁴ Note that where measures mention "our", this refers to the Authority as the original author of those measures, not to MartinJenkins as the author of this report.



- Are the needs of, and the potential impact on, consumer groups appropriately recognised in the decision-making process?
- Were an appropriate range of options considered in the decision-making process?
- Is the rationale for the option(s) chosen well evidenced?
- Were the decision-making processes clearly documented?

Impact: Consumers are engaged with through our decision-making processes

Measure 2: Assessment of the quality of our engagement with consumers in our decision-making processes

- Is there clear rationale for which groups are engaged and to what extent?
- Did the decision-making process include the use of appropriate channels, and did it offer sufficient timeframes to engage with identified consumers?
- Did the decision-making process engage with and consider a range of different consumer opinions?
- Do final decisions appropriately respond to consumer feedback?
- Is the level of detail and complexity of information provided to consumer groups appropriate?

Trust and confidence

Impact: The EA and our actions promote trust and confidence

Measure 3: Assessment of the quality of material produced (e.g., EMI reports, thought pieces)

- Is the target audience identified and understood?
- Is the level of detail and complexity appropriate for the target audience and channel of delivery?
- Is the material likely to improve the target audience’s understanding of the Electricity Authority, industry, or sector?

Low emissions energy

Impact: Our electricity market settings enable an efficient transition to reliable low-emissions energy in New Zealand

Measure 4: Assessment of the ability of market settings to facilitate an efficient transition to low-emissions energy

- Is there a clear problem definition and are identified outcomes related to low-emissions transition?
- Are an appropriate range of options and statutory powers considered?
- Has appropriate stakeholder engagement been conducted?

A full table setting out the assessments dimensions and assessment rubric are listed in **Appendix 2**



Document selection process

The Electricity Authority compiled a list of projects and documents that were relevant outputs under the consumer centricity, trust and confidence and low-emissions ambitions for the 2022 financial year (ended 30 June 2023).

MartinJenkins then selected a sample of 4 projects under the consumer centricity ambition, 5 projects comprised of 13 documents under the trust and confidence ambition and 4 projects under low emissions energy to review as part of this evaluation. In selecting the specific documents to be reviewed, we had consideration of their length and complexity, the resource and effort which went into their production, and ensuring good coverage across all functional areas of the Authority.

The 21 projects/documents selected are listed in Appendix 1.

In many cases, appraising the documents was impossible without further context and nuance – for example, to confirm the intended audience of a document. To achieve this a series of 10 interviews were conducted with 14 Authority staff-members, and 1 external stakeholder. A list of the internal interviewees is available in Appendix 6.



Assessment of consumer centricity

The Electricity Authority have worked to develop strong market conditions with the consumers at the centre of all their decisions. In the past year, the Authority has made key decisions to develop technology in the market, improve the conditions for retail consumers, and standardise the market for distributors and suppliers, creating reliability and security in the electricity industry.

Overview of selected projects / documents

The four projects that we evaluated in this section include some of the biggest and most important programmes of work initiated by the Electricity Authority in the past year. Below are brief descriptions of the projects assessed.

Electricity Authority removes requirement for distributors to make payments for avoided cost of transmission

The Electricity Authority has decided to remove the requirement for electricity distributors to make avoided cost of transmission (ACOT) payments to certain distributed generators. To support grid reliability and security of supply, the Electricity Authority will work with Transpower to signal wholesale pricing better, provide a full range of tools and targeted interventions, and improve incentives for investment into distributed generation. The result is an amendment to the Code to remove the requirement for ACOT payments, which came into force in April 2023. This change should improve the cost of electricity for consumers.

Decision on delivery mechanism and mandatory date for EIEP5A (planned outage notification)

The Electricity Authority have implemented a mandatory system for distributors to notify retailers and if desired, metering equipment providers, of any planned outages. The notification is part of their protocol, but this determines a central and consistent system to do so.

Electricity Authority imposes interim restrictions on very large electricity contracts

This project shows an understanding by the Authority about the cost of large electricity contracts to households across New Zealand. This release explains the temporary limitations on accepting new large contracts in New Zealand, with a thorough review underway to permanently amend the code for these contracts to have less impact on electricity wholesale prices in the future.

Options to promote consumers interests through Winter 2023

This project was completed in the 2022/23 year to better support consumers in New Zealand through winter months where electricity demands increase greatly. Alongside an options paper designed to show different ways the Authority could improve information to the consumer or improve industry incentives, the Authority is asking for consultation from industry and consumers to better understand the view of different parties, and to support their decision-making.



What we found (Measure #1)

The Electricity Authority clearly has an intentional focus on consumers when making decisions. In the evaluated documents, the trend of impacts on retail consumers being noted and considered in New Zealand is evident, and the decisions being made from these projects indicate that it is front of mind for the Authority right through the decision-making process.

This was also evident in interviews which we conducted with staff and external stakeholders. The intention for decisions was borne out of consumer impacts and relied on these alongside consequential impacts to other key stakeholders, such as electricity generators and suppliers.

The table below highlights the overall ratings under each of our assessment dimensions. The full list of ratings split by documents are summarised in Appendix 2. For the purposes of this report, we have focused on average ratings across documents for each dimension, to support a focus on potential areas for improvement (as compared to averaging across dimensions for each document).

Table 3: Assessment rating by assessment dimensions [Measure 1]

Assessment of the quality of our decision-making processes on meeting consumers' needs	
Overall 4.1 (rounded)	
How well are the impacted consumer groups identified?	4.3
Are the needs of, and the potential impact on, consumer groups appropriately recognised in the decision-making process?	3.5
Were an appropriate range of options considered in the decision-making process?	4.5
Is the rationale for the option(s) chosen well evidenced?	3.8
Were the decision-making processes clearly documented?	4.5

How well are the impacted consumer groups identified?

Overall, we scored the included documents at 4.3 out of 5 within this dimension.

Three of the four documents provided noted the key impacts to retail consumers in terms of annual savings to their electricity bills, with varying problems that the Authority were trying to solve. This shows that retail consumers were a key focus when considering options and asking for feedback.

On top of this, the projects in this list all impacted an array of businesses who were clearly identified by the articles we received. Framing the issues and changes the Authority was looking to make in a way that directly discusses the businesses and groups that are involved allows for more direct and effective public consultation. This is especially evident in the report for the mandatory delivery mechanism for EIEP5A which specifically names impacted stakeholders clearly and succinctly.



Are the needs of, and the potential impact on, consumer groups appropriately recognised in the decision-making process?

Overall, we scored the included documents at 3.5 out of 5 within this dimension.

While consumers are mentioned as a key focus in decision-making for the Authority in these documents, not all documents show evidence of discussion with consumer groups to find the needs of these groups. Consultation with domestic customers is understandably minimal, but the Authority isn't fully utilising all the opportunities they can to develop a well-evidenced understanding of consumer risk appetites. This can be seen in the project 'Remove requirements for distributors to make payments for avoided cost of transmission (ACOT)'. The viewpoints and trade-offs of domestic consumers is largely assumed rather than evaluated from engagement.

The more technical projects where the key consumer groups are industry groups shows a much better understanding of the consumers' needs and how the project may impact them.

Were an appropriate range of options considered in the decision-making process?

Overall, we scored the included documents at 4.5 out of 5 within this dimension.

Options analysis was very well designed in these documents. There were an appropriate number of options on all the documents, and the articles and options paper outlined these options clearly. 'Options to promote consumers interest through Winter 2023' compiles a large list of varied options to give respondents a strong basis to form opinions.

Two of the documents were slightly light on options, or heavily suggested options in the project consultation, which may slightly limit the effectiveness of the consultation.

Is the rationale for the option(s) chosen well evidenced?

Overall, we scored the included documents at 3.8 out of 5 within this dimension.

The rationale for the options chosen in this section were relatively clear and well evidenced. In particular, the rationale from the 'Options to promote consumers interest through Winter 2023' project was evidenced through responses to each comment from respondents, which were plentiful and clear about potential impacts and benefits.

In making decisions about options for domestic consumers, there is evidence that the Authority sometimes made assumptions about the benefits to consumers, which while potentially true, must be reviewed to make sure that their assumptions are correct before making decisions.

Were the decision-making processes clearly documented?

Overall, we scored the included documents at 4.5 out of 5 within this dimension.

The documents in this section show clear decision-making processes throughout, with relatively consistent approaches. When making decisions that come from long periods of consultation and deliberation, the Authority has a clear process that shows in their decision making.



The consultation process in the project suggesting to ‘Impose restrictions on very large electricity contracts’ in the longer term has been very clear and will be well evidenced, though evidence behind the interim restrictions was not in the documents provided to us. We note, however, that the separate gazette notice setting out the decision does provide a clear and persuasive rationale and narrative for why these short term steps were deemed necessary.

What we found (Measure #2)

We’ve observed an impressive level of clarity from the Authority on their quality of engagement by clearly and plainly explaining the process they’re going through and the key actions they’re taking. It’s evident that submissions are considered deliberately and comprehensively, and all the key issues raised are addressed appropriately.

In the code amendment decision to ‘Remove requirements for distributors to make payments for avoided cost of transmission (ACOT)’, we did note an assumption made on the risk appetite of domestic consumers in one of the quoted sentences⁵.

While we agree to the point made, we think there is an opportunity here to create an evidence base that tests the risk-appetites of domestic consumers and use that as a foundation for decision-making. This is further explained in our recommendations under ‘Developing an evidence base to understand consumers’.

Table 4: Assessment rating by assessment dimensions [Measure 2]

Assessment ratings for the quality of engagement with consumers in decision-making processes Overall 4.3 (rounded)	
Is there is a clear rationale for which groups are engaged and to what extent?	4.5
The decision-making process uses the appropriate channels and offers sufficient timeframes to engage with identified consumers	3.8
Did the decision-making process consider a range of different consumer opinions?	4.3
Do final decisions appropriately respond to consumer feedback?	4.5
Is the level of detail and complexity of information provided to consumer groups appropriate?	4.5

Is there is a clear rationale for which groups are engaged and to what extent?

Overall, we scored the included documents at 4.5 out of 5 within this dimension.

The projects discussed in this area were industry impacting, with secondary benefits to domestic consumers. This means that the technical aspects of the project are required to be consulted on rather than the benefits themselves

⁵ “ACOT payments are an ineffective and expensive insurance policy that the Authority is not willing to ask New Zealand consumers to keep funding”.



most of the time. In these long and deliberate projects this was the Authority's approach, which worked very well for decision-making purposes.

We have especially noted the increased engagement with the Consumer Advocacy Council through our interviewees and believe that is a great step forward to gain consumer perspective.

The Authority implemented interim restrictions on significant electricity contracts over the past year. We commend their swift action in responding to the situation. It is evident that some level of consultation took place before making this decision, as indicated by the Issues paper and the Authority's prompt response to the feedback received. This aligns with the insights we gathered from interviews, highlighting the Authority's deliberate efficiency in certain decision-making processes.

While we appreciate the Authority's responsiveness, we believe that incorporating a more structured approach to such consultations would enhance the quality of the decisions made. Our recommendation "Developing a suite of engagement approaches which balance rapid and deliberate responsiveness", further elaborates on this.

The decision-making process uses the appropriate channels and offers sufficient timeframes to engage with identified consumers

Overall, we scored the included documents at 3.8 out of 5 within this dimension.

The Authority effectively used appropriate channels such as their Issues papers and the consultations through their website for engaging with identified consumers. Outside of formal engagement through submissions, they also conducted stakeholder meetings, one-on-ones, and attended forums. This seems to be a key section of their decision-making process and cannot be faulted when it is done correctly.

Timelines were the main issue that we found in this dimension. The project asking for consultation on the 'Options to promote consumers interest through Winter 2023' allowed for only three weeks from when the article was posted before the end of consultation. This is short compared to other consultations, and we have received mixed reviews of the amount of pre-release signalling that had been conducted to make the compressed process justifiable.

With a sufficient level of pre-engagement, a compressed process is not as much of a risk because the sector is prepared. For that project specifically, we were unclear about how democratically information was shared with all parties, not just the System Operator (Transpower) and the Ministry of Business, Innovation and Enterprise (MBIE). We've had a recommendation based on this example under 'Developing a suite of engagement approaches which balance rapid and deliberate responsiveness' to reduce the risk of this taking place in the future.

Did the decision-making process consider a range of different consumer opinions?

Overall, we scored the included documents at 4.3 out of 5 within this dimension.

Opinions from consumers were clear in some articles through the decision documents, which outlined the opinions from all submitters. This was not consistent across all projects however, and looking to be clearer about the opinions of respondents to the consultation would drastically improve the quality of engagement with consumers.



Do final decisions appropriately respond to consumer feedback?

Overall, we scored the included documents at 4.5 out of 5 within this dimension.

Final decisions from projects in this section responded to feedback from consumers appropriately. We would like to highlight the exemplary response to consumer feedback shown in the decision paper in the “Decision on delivery mechanism and mandatory date for EIEP5A (planned outage notification)” project. All feedback from consumers was listed anonymously, and then responded to based on evidence or rational evaluation. We’d also like to highlight the responses to feedback in the Winter energy peaks project, where feedback was clearly appreciated and the responses to it were great.

Is the level of detail and complexity of information provided to consumer groups appropriate?

Overall, we scored the included documents at 4.5 out of 5 within this dimension.

The Authority approached the articles we assessed with an eye on accessibility and results. The articles themselves were regularly kept relatively simple, with little technical detail in them, so that they were able to reach a larger audience for less technical interested parties to understand. The consultation and decision documents linked to these articles were technical pieces, key for receiving feedback from those that understand the way the industry works and are impacted by the changes. This allows for a wide arching understanding of any changes alongside an appropriate response from key consumer groups.



Assessment of trust and confidence

The Authority takes the position in their Statement of Intent that high levels of trust and confidence help drive action and acceptance and reduce need for intervention. As the Authority largely favours a noninterventionist facilitative approach as a regulator, they seek to build trust and confidence in the industry through greater transparency, understanding and improved behaviours.

Overview of selected projects / documents

We have assessed the quality of material produced for promoting trust and confidence with thirteen selected documents which are briefly summarised below.

It's important to note here that we have evaluated the market commentary or 'explainer' articles as a group as they provide better context when assessed collectively.

Trading and open interest update

This document summarises the futures market for the electricity market. The summarisation details the history of futures trading in the New Zealand electricity market, and the benefit this creates for all parties, whether generators, suppliers, or household consumers. The futures market allows for suppliers and generators to minimise risk to electricity generation and supply costs, which allows for more certain results in the market, and better supply results to New Zealand consumers.

Sarah Gillies appointed Chief Executive of the Electricity Authority

An introduction of the appointment of the new Chief Executive, Sarah Gillies, to the Electricity Authority, including a short history of Sarah's previous work and a comment from her about her aspirations in the new role.

New investigation into alleged breach

An investigation notice noting the beginning of an investigation into an alleged clause breach of the Electricity Industry Participation Code 2010. Details of the particular notice have been withheld as the matter is still in progress.

Next steps for our winter demand project

This document is the notification from the decision about options that had been identified for further development to better manage potential tight supply situations for winter 2023 and beyond. This article states that the Authority has progressed one of the options to clarify availability and use of 'discretionary demand' control.

Keeping the lights on with reserves

This document explains the concept of energy reserves and the importance of them in electricity supply. The document explains spare capacity or instantaneous reserve requirements in New Zealand, and how this market



supports any possible outages from large generators. Finally, there is also a discussion about the use of battery technology in the future to have immediately accessible reserve electricity.

'Explainer articles' collection

- **Electricity Authority awards commercial market-making contract**

The Authority held a public consultation on amendments on the code which set out new service level parameters for regulated market making. This document explains that the Authority has selected a company to provide commercial market-making services, entering the market in September 2022. The introduction of this contract and amendment of the code will mean that the company will provide 20% of the total volume of market-making contracts.

- **Exchange traded electricity futures margins update**

This report is an explanatory note on the electricity futures market at the time. It explains that the updated margin requirements for exchange traded New Zealand electricity futures have stayed consistent with previous requirements. Further, this report notes the issue that was being faced with market-makers being absent from the futures market during regular periods of the year, and that the commercial market-making contract given by the Authority should stabilise the contracts in the market to be more consistent and give better access to those that would like to participate in the market. It is also noted that this will reduce price uncertainty due to an increase in trading days and improved liquidity.

- **Spot prices fall as hydro storage increases**

A report to explain the relation between abundance of available hydro generation coming from heavy rain and decreasing wholesale electricity rates. It is also noted that in December 2019, a similar increase in available hydro generation occurred, but the wholesale rates didn't drop until much later. This has officially been called an undesirable trading situation, and the Electricity Authority has reset prices for that period, and introduced new trading rules in 2021 to improve trading conduct.

- **How hydro storage impacts spot prices**

This article aims to educate an audience with little understanding about the electricity market about the links between the wholesale price for electricity and the abundance of available water at hydro generators, and the reason for this correlation.

- **Electricity price volatility**

This article gives an insight into the electricity market, where companies that generate electricity sell to suppliers. The price volatility comes from large spikes in demand for electricity at certain points during the day, as well as the availability of cheap generation of energy, such as hydro or wind generation. The article continues to give examples of this price volatility in action, and note that as non-renewable energy is phased out, the volatility of prices is likely to increase.



- **The New Zealand gas market**

This article seeks to explain the key businesses involved in the New Zealand gas market, and how the more general gas market can impact the electricity market in New Zealand. When gas prices fluctuate, this can impact the spot price for electricity when gas produced electricity is required to meet demand. When there is excess gas in the market the generators may choose to allow hydro generators to produce less to conserve the water in their reservoirs.

- **Southern lakes and spot prices: declining lake levels at Te Anau and Manapōuri**

This article details the water storage levels that have occurred lakes across the country, specifically Te Anau and Manapōuri which feed into the Manapōuri Power Station. The two lakes have been below historical averages in late 2022, while the national average has been much higher than historical averages. The direct impact of this is that the electricity price offered by Manapōuri Power Station has been higher than usual.

- **The forward electricity market explained**

This document explains what the forward (or futures) market for electricity is, and how it works. There are explanations for how forward prices are determined and what influences these prices, such as market conditions, hydro storage, and seasonal climate expectations.

What we found (Measure #3)

The Authority's commitment of creating a network of easily accessible links for a range of different resources has been a standout from our perspective. We've seen this as a considerable improvement from last year's assessment and see an opportunity to further excel in this area to solidify the Authority's standing in the industry as not only a regulator, but an educator. We have discussed our recommendation off the back of this finding under 'Increasing the accessibility of educational resources'. We've also observed clear commentary and storylining at the start of each project document regardless of the level of technicality and complexity.

The areas affecting the level of trust and confidence the Authority has in the industry are more foundational and appear to be systematic. The key example of this is the delay in investigation following the notice without adequate communication to the involved parties, which is a noticeable setback for trust and confidence as a regulator. We have further discussed under the recommendation 'Mitigating under-resourcing risks for statutory functions'.

The table below highlights the overall ratings under our dimensions, and they heavily take into consideration the insights that came out of our interviewees.



Table 5: Assessment rating by assessment dimensions [Measure 3]

Assessment rating for the quality of material produced Overall 3.9 (rounded)	
Is the target audience identified and understood?	4.2
Is the level of detail and complexity appropriate for the target audience and channel of delivery?	3.6
Is the material likely to improve the target audiences' understanding of the Electricity Authority, industry, or sector?	3.8

Is the target audience identified and understood?

Overall, we scored the included documents at 4.2 out of 5 within this dimension.

Target audiences for this section were relatively good, with the identification for who will be reading and understanding the content being understood by the Authority. We would especially like to reference the 'explainer' articles which we have bundled together, which are aimed largely at domestic consumers who are interested in the electricity market. These articles are very well placed for this target market.

Is the level of detail and complexity appropriate for the target audience and channel of delivery?

Overall, we scored the included documents at 3.6 out of 5 within this dimension.

The level of detail and complexity was largely very appropriate for the targeted groups that had been identified for each article. When aimed at domestic consumers, the majority of the content was extremely good, with simple explanations and links to allow readers to continue to learn at this higher level.

Some of the content aimed at more knowledgeable consumers missed the mark due to a mixing of the identified target audience and the content in the article, such as being too detailed about the electricity market in a paper designed for financial traders. On top of this, the investigation paper we evaluated was did not appear to meet the Authority's standards, with no mention of what had happened in the alleged breach – undermining its purpose of informing other potential parties. This is further discussed in our recommendations.

Is the material likely to improve the target audiences' understanding of the Electricity Authority, industry, or sector?

Overall, we scored the included documents at 3.8 out of 5 within this dimension.

Articles designed for domestic consumers were exemplary, with detail allowing for improved understanding of the electricity industry and sector. We noticed in some of these articles that any terms that were slightly more difficult were regularly linked to other articles that explained them. This gave agency to domestic consumers to learn about the electricity industry in an easy format, with a network of information available to them. At a more detailed level,



the key focus seemed to be considering how to improve understanding of the electricity sector, and it showed through the good content that had been created.

The investigation that was covered had little useful content and did not allow any stakeholder to better understand what had happened in the case, or why the Electricity Authority was investigating in the first place. Information such as this will improve trust and confidence in the organisation in the future, but does the opposite in its current form.



Assessment of low emissions energy

Unlocking the potential for more renewable generation is a focus area for the Authority. The Authority aims to promote a stable investment environment with robust roles and clear price signals to ensure the transition is as efficient as possible while maintaining energy security, system adaptability and affordable electricity for consumers.

Overview of selected projects / documents

The four projects we evaluated in this section are all future focused, where the Authority is working to adapt the market to be prepared for changes to the way electricity is generated. Below are brief descriptions of the projects assessed.

Updating regulatory settings for electricity distribution networks to support the transition to a low-emissions economy

The market for power generation is changing and current patterns suggest that the future will hold many individual or small power generators supporting the current large power generators. The Authority is interested in updating their regulatory settings to take away any barriers for small generators to enter the market and prepare for this change in the way current electricity purchasing and supply is run in New Zealand. The key area to evaluate changes is the distribution networks that will allow households, businesses, and industrial consumers to use distributed energy resources (DER) to have control of the energy they generate and participate more freely in the market.

Changing winds: how wind energy interacts with the New Zealand power system

A media report to discuss the intermittency of wind power generation in New Zealand, and how the spot price and thermal generation are inversely related to wind generation trends. To increase flexibility in a more renewable electricity future, there would need to be use of technologies such as grid scale batteries, or improved predictions of wind and thermal generation – fuelled using biomass instead of fossil fuels.

Pricing in a renewables-based electricity system

A project to evaluate how price discovery would work in the wholesale electricity market in New Zealand if we were to move to a completely renewable generation future. Consultation from an Issues Paper formed the base for an options paper which gives plenty of potential solutions of varying effects and focuses for consultation from stakeholders. The project is aligned but not connected to other projects being run in government across different agencies and is solely focused on the pricing aspect of the electricity market, and whether the market will still be needed in the future state.

Future security and resilience - Phase 3

Phases 1 and 2 of this project identified opportunities and challenges affecting the security and resilience of the power system as we transition to a low-emissions energy system and created a roadmap of activities to address these. This phase focuses on delivering the multi-year programme of studies and solutions to address these



challenges and opportunities. The current consultation linked alongside this asks for engagement on the common quality requirements in the Electricity Industry Participation Code 2010, which regulates the participation of generators connected to the national grid. As the nature of the generators feeding electricity into the grid may change in the future, the regulations need to allow equitable access to the market for inverter-based resources.

What we found (Measure #4)

We have seen found through some of our interviewees, that the Authority is rapidly streamlining their processes to maintain a level of flexibility with their future work programme. We’ve seen evidence of a greater sense of adaptability through the prioritisation and deprioritising of work programmes, especially in the ‘Future security and resilience indicators’, which monitor changes in the opportunities and challenges of the power system.

This is a great step forward in facilitating an efficient transition to a low-emissions economy. On the other hand, there is an opportunity here to amplify engagement in order to get the most efficient and impactful outcomes that are realistic, consumer-centric, and market-centric. The level of engagement in such a rapidly transformative area of work directly impacts the level of trust and confidence and reliability the Authority holds in the sector. We have further discussed this in recommendation ‘Developing a suite of engagement approaches which balance rapid and deliberate responsiveness’.

The table below highlights the overall ratings under our dimensions.

Table 6: Assessment rating by assessment dimensions [Measure 4]

Assessment rating on the ability of market settings to facilitate an efficient transition to low-emissions energy	
Overall 4.3 (rounded)	
Is there a clear problem definition and are identified outcomes related to low-emissions transition?	4.8
Are an appropriate range of options and statutory powers considered?	4
Has appropriate stakeholder engagement been conducted?	4.3

Is there a clear problem definition and are identified outcomes related to low-emissions transition?

Overall, we scored the included documents at 4.8 out of 5 within this dimension.

With the understanding of the low emissions energy transition requirements ahead of the Authority, they have understood the problem definitions and have outlined key projects and outcomes for this transition. There are no major problems in this area.

Are an appropriate range of options and statutory powers considered?

Overall, we scored the included documents at 4 out of 5 within this dimension.



The Authority has been consistent with offering consultation papers with a range of options that lead to varied opinions. This is an area that should continue, as offering plenty of options allows for effective feedback from consumers.

One of the consultation projects, evaluating how wind energy interacts with the New Zealand power system, only offered two options from the Authority, both of which require technologies that don't exist yet. Offering a wider range, even if they were less impactful options, would allow for steps to be made in the right direction.

Has appropriate stakeholder engagement been conducted?

Overall, we scored the included documents at 4.3 out of 5 within this dimension.

Stakeholder engagement was a very clear intention in this section, with multiple projects showing strong consultation processes. The Authority can focus on being intentional in communicating the steps and results of consultations as in some projects this does not come through clearly, such as the consultation to evaluate how wind energy interacts with the New Zealand power system.



Appendix 1: Shortlisted documents

Table 7: Final list of shortlisted documents

Business unit	Strategic goal	Type	Title/Subject	Link	Month published
Wholesale Policy	Consumer Centricity	Media release	Electricity Authority imposes interim restrictions on very large electricity contracts	https://www.ea.govt.nz/news/press-release/authority-imposes-interim-restrictions-on-very-large-electricity-contracts/	Aug-22
Operational Policy	Consumer Centricity	Media release	Options to promote consumers interests through Winter 2023	https://www.ea.govt.nz/news/press-release/options-to-promote-consumers-interests-through-winter-2023/	Nov-22
Network Pricing	Consumer Centricity	Code amendment decision	Electricity Authority removes requirement for distributors to make payments for avoided cost of transmission	https://www.ea.govt.nz/news/press-release/electricity-authority-removes-requirement-for-distributors-to-make-payments-for-avoided-cost-of-transmission/	Jan-23
Retail and Network Policy	Consumer Centricity	Decision	Decision on delivery mechanism and mandatory date for EIEP5A (planned outage notification)	https://www.ea.govt.nz/news/general-news/decision-on-delivery-mechanism-and-mandatory-date-for-eiep5a-planned-outage-notification/	Apr-23
Retail and Network Policy	Low-Emissions Energy	Media release	Updating regulatory settings for electricity distribution networks to support the transition to a low-emissions economy	https://www.ea.govt.nz/news/press-release/updating-regulatory-settings-for-electricity-distribution-networks-to-support-the-transition-to-a-low-emissions-economy/	Jul-22
Monitoring / Comms	Low-Emissions Energy	Published material	Changing winds: how wind energy interacts with the New Zealand power system	https://www.ea.govt.nz/news/eye-on-electricity/changing-winds-how-wind-energy-interacts-with-the-new-zealand-power-system/	Oct-22
Wholesale Policy	Low-Emissions Energy	Transformational projects	Pricing in a renewables-based electricity system	https://www.ea.govt.nz/projects/all/pricing-in-a-renewables-based-electricity-system/	Mar-23
Future Security and Resilience	Low-Emissions Energy	Consultation	Future security and resilience phase 3	https://www.ea.govt.nz/projects/all/future-security-and-resilience/	Apr-23



Wholesale Policy	Trust and Confidence	Media release	Electricity Authority awards commercial market-making contract	https://www.ea.govt.nz/news/press-release/electricity-authority-awards-commercial-market-making-contract/	Jul-22
Monitoring / Comms	Trust and Confidence	Market Commentary	Exchange traded electricity futures margins update	https://www.ea.govt.nz/news/eye-on-electricity/exchange-traded-electricity-futures-margins-update/	Aug-22
Monitoring / Comms	Trust and Confidence	Market Commentary	Spot prices fall as hydro storage increases	https://www.ea.govt.nz/news/eye-on-electricity/spot-prices-fall-as-hydro-storage-increases/	Aug-22
Monitoring / Comms	Trust and Confidence	Market Commentary	How hydro storage impacts spot prices	https://www.ea.govt.nz/news/eye-on-electricity/how-hydro-storage-impacts-spot-prices/	Sep-22
Monitoring / Comms	Trust and Confidence	Market Commentary	Electricity price volatility	https://www.ea.govt.nz/news/eye-on-electricity/electricity-price-volatility-an-emerging-feature-in-an-increasingly-renewable-market/	Sep-22
Monitoring / Comms	Trust and Confidence	Market Commentary	The forward electricity market explained	https://www.ea.govt.nz/news/eye-on-electricity/the-forward-electricity-market-explained/	Oct-22
Monitoring / Comms	Trust and Confidence	Market Commentary	Southern lakes and spot prices: declining lake levels at Te Anau and Manapōuri	https://www.ea.govt.nz/news/eye-on-electricity/southern-lakes-and-spot-prices-declining-lake-levels-at-te-anau-and-manapouri/	Oct-22
Monitoring / Comms	Trust and Confidence	Market Commentary	Trading and open interest update	https://www.ea.govt.nz/news/eye-on-electricity/trading-and-open-interest-update/	Nov-22
Comms	Trust and Confidence	Media release	Sarah Gillies appointed Chief Executive of the Electricity Authority	https://www.ea.govt.nz/news/press-release/sarah-gillies-appointed-chief-executive-of-the-electricity-authority/	Dec-22
Monitoring / Comms	Trust and Confidence	Published material	Keeping the lights on with reserves	https://www.ea.govt.nz/news/eye-on-electricity/keeping-the-lights-on-with-reserves/	Jan-23
Compliance	Trust and Confidence	Investigation result	New investigation into alleged breach	<i>Details withheld as the matter is still in progress</i>	<i>Details withheld as the matter is still in progress</i>



Operational Policy	Trust and Confidence	Decision	Next steps for our winter demand project	https://www.ea.govt.nz/news/general-news/next-steps-for-our-winter-demand-project/	Mar-23
Monitoring / Comms	Trust and Confidence	Market Commentary	The New Zealand gas market	https://www.ea.govt.nz/news/electricity/the-new-zealand-gas-market/	Apr-23



Appendix 2: Summary assessment of consumer centricity: [Measure 1]

Table 8: Assessment dimensions and rubric [Assessment of the quality of our decision-making processes on meeting consumers' needs]

Dimension	Rating				
	1	2	3	4	5
How well are the impacted consumer groups identified?	No impacted consumer groups are identified	-	Some impacted consumer groups are identified	-	A comprehensive set of impacted consumer groups are identified
Are the needs of, and the potential impact on, consumer groups appropriately recognised in the decision-making process?	No evidence of consideration of the needs of and impact on consumer groups	-	Some evidence of consideration of the needs of and impact on consumer groups	-	Comprehensive consideration of the needs of and impact on consumer groups
Were an appropriate range of options considered in the decision-making process?	No evidence of options considered or available under the Electricity Authority's statutory powers	-	Some evidence of options considered or available under the Electricity Authority's statutory powers	-	Comprehensive consideration of options available
Is the rationale for the option(s) chosen well evidenced?	The chosen option is not supported by a rationale and intervention logic	-	The chosen option is supported by some rationale and intervention logic	-	The chosen option is supported by a comprehensive rationale and intervention logic
Were the decision-making processes clearly documented?	No documentation of the rationale and how the decision was reached	-	Some documentation of the rationale and how the decision was reached	-	A comprehensive description of the rationale and how the decision was reached



Table 9: Summary rating [Assessment of the quality of our decision-making processes on meeting consumers' needs]

Document	How well are the impacted consumer groups identified?	Are the needs of, and the potential impact on, consumer groups appropriately recognised in the decision-making process?	Were an appropriate range of options considered in the decision-making process?	Is the rationale for the option(s) chosen well evidenced?	Were the decision-making processes clearly documented?	Overall
Electricity Authority removes requirement for distributors to make payments for avoided cost of transmission	4 – The impacted consumer groups are not explicitly named, but the decisions state disagreement with stakeholders that benefit from no change, which indicates understanding of impacted consumer groups.	2 – There was no consultation with domestic consumers or evidence indicating what they are and are not willing to pay for. Due to the assumptions made on this side, consumer groups were not appropriately recognised in this process.	4 – Two options were consulted on by the public, which likely were the best two options, but this is phrased as a proposal and one alternative option, which is restrictive.	4 – The rationale for the options in this report are well evidenced through the consultation document, and further explained in the decision document. The lack of evidence behind statements on retail consumers discredits some of the evidence of the chosen options.	5 – The decision-making process was clearly laid out, with a consultation process, and a full decision document explaining the final decision.	3.8
Decision on delivery mechanism and mandatory date for EIEPSA (planned outage notification)	5 – This media report distinctly names the consumer group that must report using this style, as well as any group that may receive these reports.	3 – The needs and impacts on consumer groups are considered through a consultation process, and optionality for wider groups to be involved but assumptions about benefits to consumer groups are assumed in this process.	5 – Four options were given in the consultation process which effectively covered every possible situation between status quo and mandatory change.	2 – The rationale for the change relies on assumptions about benefits to consumers rather than evidence at times, which heavily impacts the final outlaid options.	5 – The decision-making process is clearly laid out in a timeline from a link at the bottom of the media report and mentioned in the report itself.	4
Electricity Authority imposes interim restrictions on very large electricity contracts	5 – The impacted consumer groups impacted by large electricity contracts are stated to be households across the country, with estimates of impact clearly noted.	4 – The impacts on consumers are the key determinant behind the decisions, although the benefits to the consumer are not clearly laid out based on the decision.	4 – There are 3 options outlined in the Code amendment allowing large electricity contracts to continue to be created. A permanent code amendment being consulted on will likely consider a wider range of options in the process.	4 – The rationale of the impacts is evidenced by the Authority, and the options outlined are temporary while a consultation process takes place. The temporary options do not show any evidence behind them but are consistent with minimising the impacts to the consumer.	3 – The long-term decision-making process is clearly noted with a consultation process taking place, but the short-term decision shows no documented process.	4
Options to promote consumers interests through Winter 2023	3 – The media release seems to indicate that the impacted consumer group is system wide consumers but does not explicitly indicate any impacted consumer groups.	5 – A options paper was created to recognise the impacts on consumer groups, and from this options paper, the Electricity Authority is asking for consultation from all impacted groups.	5 – A wide range of options are laid out in the options paper, ranging from simple to complex.	5 – The options have been chosen with clear evidence and are further evidenced with feedback from consultation. All other options that were suggested through the consultation process were considered and responded to in the decision document with clear descriptions of why or why not they would include this in their final option.	5 – The options paper shows an array of options, as well as proposed evaluation criteria. The rationale is therefore clearly documented alongside the consultation process.	4.6
Overall	4.3	3.5	4.5	3.8	4.5	4.1



Appendix 3: Summary assessment of consumer centricity: [Measure 2]

Table 10: Assessment dimensions and rubric [Assessment ratings for the quality of engagement with consumers in decision-making processes]

Dimension	Rating				
	1	2	3	4	5
Is there clear rationale for which groups are engaged and to what extent?	No rationale for groups engaged, or no engagement	-	Some rationale for groups engaged	-	Clear rationale for the groups engaged and the extent to which they were.
Did the decision-making process include the use of appropriate channels, and did it offer sufficient timeframes to engage with identified consumers?	Channel and timeframes inappropriate for engagement with identified consumers	-	Channel and timeframes suitable for engagement with identified consumers	-	Channel and timeframes actively support robust engagement with identified consumers
Did the decision-making process engage with and consider a range of different consumer opinions?	The decision-making process does not engage with or consider a range of differing consumer opinions	-	The decision-making process engages with some and considers a decent range of differing consumer opinions	-	The decision-making process engages with and considers a large range of differing consumer opinions
Do final decisions appropriately respond to consumer feedback?	The final decisions respond to no consumer feedback	-	The final decisions respond to some consumer feedback	-	The final decisions respond to a comprehensive amount of consumer feedback
Is the level of detail and complexity of information provided to consumer groups appropriate?	The level of detail and complexity is not appropriate for consumer groups	-	The level of detail and complexity is somewhat appropriate for consumer groups	-	The level of detail and complexity is appropriate for consumer groups



Table 11: Summary rating [Assessment of the quality of our decision-making processes on meeting consumers' needs]

Document	Is there is a clear rationale for which groups are engaged and to what extent?	The decision-making process uses the appropriate channels and offers sufficient timeframes to engage with identified consumers	Did the decision-making process consider a range of different consumer opinions?	Do final decisions appropriately respond to consumer feedback?	Is the level of detail and complexity of information provided to consumer groups appropriate?	Overall
Electricity Authority removes requirement for distributors to make payments for avoided cost of transmission	5 – The groups engaged with were the impacted consumer groups in this decision, allowing for understanding from their point of view.	4 – The time between the beginning of consultation and decision was three months, which is a decent amount of time for a thorough consultation with stakeholders.	4 – The decision-making process considered opinions that supported and did not support the final decision, with non-acceptance being given to those that did not accept it.	4 – While the final decision did not follow the view of some submitters, the decision considered their feedback and responded to them in the document and media report.	4 – The level of detail is likely slightly simple for the target audience but covers the key information points for the impacted consumer groups.	4.2
Decision on delivery mechanism and mandatory date for EIEPSA (planned outage notification)	5 – The groups involved in the consultation are the key impacted groups.	5 – The decision made was delayed due to other priorities and the consultation period allowed for reasonable response time from consumers.	5 – The decision-making process considered opinions from a range of consumers and the decision document collates the feedback from all respondents.	5 – The decision document responds to consumer feedback appropriately, with most comments being responded to directly. The decisions are often based on logical and common comments from consumers.	5 – The level of detail in the article is technical in the places required and the article links to further information for impacted parties.	5
Electricity Authority imposes interim restrictions on very large electricity contracts	3 – The groups that were consulted with on the Authority's Issues Paper and the consultation after the temporary changes have been put in place have not been named clearly in this document.	4 – The article is posted 6 weeks before consultation closes, allowing time to submit opinions to the Authority. The specific channels this consultation is aimed at are not named.	3 – A consultation did occur to some effect ahead of decision-making, but the range of opinions from different consumers are not explained in this article.	4 – This decision was brought on from feedback on a consultation from a previous Issues Paper.	4 – The article is slightly too descriptive for the average consumer but does outline the potential benefits to them based on indicative results from the change in a clear and simple format.	3.6
Options to promote consumers interests through Winter 2023	5 – This consultation seems to have been open to the public and key commercial stakeholders, allowing for an appropriate range of opinions.	2 – The consultation is open which is appropriate, but the article was posted only 3 weeks before all submissions were due on the consultation paper.	5 – The consultation document gave a large range of options for the consumer groups to voice opinions on, which will have allowed for this appropriately.	5 – The consultation gives plenty of room for consumer feedback on a decision focused on improving outcomes for consumers.	5 – The article is kept at a very accessible level of detail which for the majority of consumer groups, and the consultation document is more detailed for key stakeholders with industry understanding.	4.4
	4.5	3.8	4.3	4.5	4.5	4.3



Appendix 4: Summary assessment of Trust and Confidence [Measure 3]

Table 12: Assessment dimensions and rubric [Assessment of the quality of material produced (e.g., EMI reports, thought pieces)]

Dimension	Rating				
	1	2	3	4	5
Is the target audience identified and understood?	The target audience is not actively identified and understood	-	The target audience is somewhat identified and understood	-	The target audience is well-identified and understood
Is the level of detail and complexity appropriate for the target audience and channel of delivery?	There is no clear relationship between the level of detail and complexity, and the target audience and channel of delivery	-	There is a clear relationship between the level of detail and complexity, and the target audience and channel of delivery	-	The level of detail and complexity is tailored specifically to the target audience and channel of delivery
Is the material likely to improve the target audience's understanding of the Electricity Authority, industry, or sector?	The material is unlikely to improve the target audience's understanding of the Electricity Authority, industry, or sector	-	The material is likely to somewhat improve the target audience's understanding of the Electricity Authority, industry, or sector	-	The material is highly likely to significantly improve the target audience's understanding of the Electricity Authority, industry, or sector

Table 13: Summary rating [Assessment of the quality of material produced]

Document	Is the target audience identified and understood?	Is the level of detail and complexity appropriate for the target audience and channel of delivery?	Is the material likely to improve the target audiences' understanding of the Electricity Authority, industry, or sector?	Overall
Trading and open interest update	3 – The target audience is not explicitly identified but is relatively implied and the material largely fits with their interests. The way the material is framed limits the target market greatly due to its detail.	3 – The article is too detailed for a member of the public wanting to learn about the forward market and does not link to any wider explanations of this market.	4 – The material will likely improve the understanding of the Authority by much of the target audience but will not be understood by the whole target audience.	3.3
Sarah Gillies appointed Chief Executive of the Electricity Authority	5 – The target audience is large, and the article is open and clear to all those that are interested in the appointment of the new Chief Executive.	5 – The content in this article is simple and covers all necessary items.	5 – The material makes it very clear about the direction of the Authority into the future for all interested parties.	5
New investigation into alleged breach	4 – The article explicitly states that the Authority does not believe that there are any participants beyond those named that are affected by the matter. The article is required based on regulations and has correctly been pitched to an insider audience.	1 – The article at no point states what had allegedly occurred to breach the code. In interviews we understand that there was a more complete article intended to be posted, but was not posted, and we were never given a reason for this.	1 – The Authority does not make it clear what the alleged code breach was in the article, and therefore does not explain why there is an investigation occurring at all.	2
Next steps for our winter demand project	5 – The article notes the potential for design and implementation requirements alongside code amendments, which is specifically for participants in the industry to note.	5 – The material is kept simple and clear in this article, and there is a link to the full decision document for those that would like a full understanding of the decision.	5 – The material is specifically designed to explain a change in the regulations for the industry and allow participants to understand the potential changes that may occur.	5
Explainer articles – mix of media releases and market commentary	5 – The majority of these articles are targeted at domestic consumers who have little understanding of the electricity market. These articles indicate their knowledge of this through the way they are written. The articles that require more knowledgeable audiences are evident in the content chosen to discuss	4 – The articles aimed at domestic consumers were regularly at a high level allowing for ease of understanding, and often included links to other articles to explain more complicated topics. Other media releases were written well for consumer groups with more knowledge but were inconsistent with the level of understanding required within a topic.	4 – The articles in general were very good for helping domestic consumers understand the electricity market, and how generation to supply works. Some articles, while very useful in the context of the industry and sector, could improve by giving more context about the Electricity Authority's role within the sector.	4
Overall	4.2	3.6	3.8	3.9



Appendix 5: Summary assessment of Low-Emissions Energy [Measure 4]

Table 14: Assessment dimensions and rubric [Assessment of the ability of market settings to facilitate an efficient transition to low-emissions energy]

Dimension	Rating				
	1	2	3	4	5
Is there a clear problem definition and are identified outcomes related to low-emissions transition?	The problem definition and outcomes are unrelated to low-emission transition.	-	The problem definition and outcomes are somewhat related to low-emissions transition	-	The problem definition and outcomes are clearly and significantly related to low emissions transition
Are an appropriate range of options and statutory powers considered?	There are no options identified and statutory powers considered	-	There are some options identified and statutory powers considered	-	There are a comprehensive set of options identified and statutory powers considered
Has appropriate stakeholder engagement been conducted?	No stakeholder engagement has been conducted	-	Some stakeholder engagement has been conducted	-	A comprehensive level of stakeholder engagement has been conducted

Table 15: Summary rating [Assessment rating on the ability of market settings to facilitate an efficient transition to low-emissions energy]

Document	Is there a clear problem definition and are identified outcomes related to low-emissions transition?	Are an appropriate range of options and statutory powers considered?	Has appropriate stakeholder engagement been conducted?	Overall
Updating regulatory settings for electricity distribution networks to support the transition to a low-emissions economy	5 – The problem being faced by the market as more DER solutions try to enter the market is clearly understood as distribution infrastructure and regulations. The outcomes from this consultation will likely update regulations to better align with the market after this transition period.	5 – The options given in the consultation document are varied and open to wide ranging ideas. This includes small and large changes to statutory powers, with suggested options from the Authority as a basis.	4 – The consultation is open and far more reachable for individuals and businesses who produce small levels of energy, which will allow some context from their point of view, but largely is aimed at the industry.	4.7
Changing winds: how wind energy interacts with the New Zealand power system	5 – The problems indicated are both the inconsistency of wind energy generation and the difficulty to forecast wind. The outcomes related to a low-emissions transition are outlined as improving wind prediction and grid scale batteries.	2 – Two options are discussed as ways to improve the inconsistency of wind generation, both requiring technologies that do not currently exist at the required level. Adjustments of other power generation methods are mentioned as needed but not qualified with any further information.	3 – No stakeholder engagement discussed in the options creation, although they are assumed to be industry discussion points.	3.3
Pricing in a renewables-based electricity system	5 – The problem definition and outcomes of pricing in a renewables-based electricity system is clear and functional for the project and consultation.	5 – The options paper includes 47 options for consultation, with preferred options highlighted from previous engagement and research. These include simple adjustments to process, to complete overhaul of the wholesale electricity market.	5 – Appropriate stakeholder engagement seems to have occurred from the Issues Paper before the options identification and open consultation, which will allow for further consultation from the public.	5
Future security and resilience phase 3	4 – The problem definition is clearly laid out in what section of the Code needs updating. The outcomes are relatively open to interpretation from consultation and could result in a wide range of potential solutions.	4 – Statutory powers are specifically being assessed in this context and there are a relatively appropriate set of options for this section of Code.	5 – Stakeholder engagement has been a large section of earlier phases of this project, which has led to the consultation to evaluate what can be improved in the current Code.	4.3
Overall	4.8	4	4.3	4.3



Appendix 6: List of interviewees

Table 16: List of interviewees

Contact Name	Position
Brent Lewers	Manager, Retail and Network Policy
Gary White	Principal Analyst, Retail and Networks
Tim Sparks	Director, Network Pricing
Sean Martin	Principal Advisor, Communications & Engagement
Chris Otton	Manager, Operations Policy
Sheila Matthews	Manager, Future Security and Resilience
Viktorija Nordstrom	Quantitative Analyst
Doug Watt	Manager, Market Monitoring
Grant Benvenuti	Principal Advisor, Operations
Nicole Gagnon	Commercial Contract Manager, Organisational Performance and Delivery
Peter Kerr	Manager, Compliance
Clive Bull	Consultant
Paul Sullivan	Principal Analyst
James Goodchild	Senior Analyst, Wholesale Markets
Almo Wong	Senior Policy Analyst

Note: The external stakeholder remains confidential for the purpose of this review.



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