

14 September 2026

Submissions  
Electricity Authority

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### **Improvements to industry switching processes**

Meridian appreciates the opportunity to provide feedback on the Authority's technical consultation paper on proposed Code amendments to improve switching processes, improve data accuracy, and increase the efficiency and reliability of market operations.

Meridian agrees that efficient switching arrangements benefit customers and the wider market by supporting consumer choice, reducing barriers to switching, and promoting competition and innovation. In previous rounds of consultation Meridian was broadly supportive of the proposed improvements to switching processes.

This submission comments on:

- the proposed implementation timeframes; and
- parts of the proposed Code drafting that in Meridian's opinion may be challenging to implement or do not accurately reflect the policy intent outlined in the consultation paper.

Meridian has also read and supports the submission made by Electricity Retailers' and Generators' Association of New Zealand (ERGANZ).

### **Implementation timeframes**

Meridian recommends a period of at least 18 months be allowed for implementation of these proposals with the 18 months commencing only once the associated registry functional specification and file formats are finalised and published. The implementation period should not commence upon a decision to amend the Code alone since participants cannot begin planning and implementing the changes until the full package is understood.

An 18-month implementation period from finalisation of registry functional specifications and file formats would also enable more realistic time for participant system changes, testing, and development of guidance and industry training.

As noted by ERGANZ retailers are also undertaking significant change programmes to implement recently agreed reforms. Meridian is also managing a transition to a new retail software platform. The additional implementation burden created by the proposals in the consultation paper will compound existing pressures, making a reasonable implementation timeframe all the more critical to success of the proposals.

### **Concerns with specific aspects of the Code drafting**

- Meridian notes the proposed change to clause 17 of Schedule 11.3 to allow a trader ICP switch to be withdrawn at any time prior to the 14-month reconciliation revision cycle for the month in which the switch event date falls. Meridian understands that the recent decision by the Authority to alter reconciliation processes and require the use of half-hourly data will, once it takes effect, change the 14-month reconciliation revision cycle to 13 months. Meridian queries whether the Authority should consider aligning the Code drafting with those new reconciliation revision timeframes.
- In Meridian's opinion the proposed drafting of clause 18A(2)(c) should not proceed. It would not be reasonable to require a trader to accept a notice of switch withdrawal request within one business day of the switch withdrawal (NW file) date if the requesting trader has given the reason "wrong premises" (WP). The existing 5 business day period from clause 18 should continue to apply where the "wrong premises" reason is given since that timeframe enables a gaining retailer to contact a customer and query whether they have provided the correct information about the premises. Removing the ability to have these conversations will result in poor consumer switching experiences. The Code drafting may not match the policy intention here because the table in paragraph 5.11 of the consultation paper indicates that mandatory acceptance of a switch withdrawal is only required when requested by a *gaining trader*. However, the drafting of clause 18A applies to all traders, meaning a losing trader could force a gaining trader to accept a switch withdrawal (and in the case of "wrong premises" not allow time for a gaining trader to verify that with the new customer, as noted above).

- The proposed Code changes require response codes for AN files to use the relative priorities specified in the functional specification to ensure the most relevant response is selected. The table in paragraph 5.7 of the consultation paper also sets out the priority of response codes for AN files within the registry's functional specifications. In Meridian's opinion, the Code AD should not be used and should be replaced with an alternative code for priority 7. AD currently means "Advanced Metering" and will have been used for most of current switching. Using a different Code for priority 7 will avoid potential confusion and misapplication of codes.
- Meridian considers the proposed changes to clause 4 of Schedule 11.3 will be challenging to implement. Meridian would prefer that existing timeframes be retained to allow an event date no more than 10 business days after the date the registry manager gives written notice to the losing trader, and with at least 50% of event dates within 5 business days. In Meridian's opinion those timeframes should continue to apply regardless of meter type.
- Proposed clauses 5 and 11 of Schedule 11.3 specify that "If final information is not provided on the event date, the final information must be provided no more than one business day after the date on which the registry manager, under clause 22(1)(a), makes written notice available to the losing trader." That drafting seems to contradict the table in paragraph 5.9 of the consultation paper that suggests it will become mandatory for the losing trader to complete the CS file:
  - For standard switch process (TR), (BT) and (BI) – on the specified event date where a date is specified, and if no date specified, non-AMI within 3 business days after switch event date, and AMI within 1 business day.
  - For move-in switch process (MI) – on the specified event date or 1 business day after the NT file sent to the losing trader if no specified event date
  - For gaining trader switch process (HH) – 3 business days after the switch event date.

Paragraph 5.10 of the consultation paper also suggests a third contradiction by stating that in exceptional circumstances where the trader responsible for the ICP is unable to provide the CS file within two business days, for reasons outside of its control, it must use best endeavours to provide the file as soon as practicable. Like the table in paragraph 5.9, this approach does not appear to be reflected in the proposed Code drafting. Meridian suggests that timeframes for provision of final information and completion of CS files need to be clarified to resolve these

uncertainties and that allowing only one business day for losing traders to provide final information to complete a switch may be operationally challenging to implement.

- Meridian also agrees with the four matters identified in the ERGANZ submission on:
  - the need for the term “exceptional circumstances” to be defined;
  - the inconsistent use of business days and calendar days across paragraph 6.10 of the consultation paper and proposed clauses 1(1A) and 1(1C) of Schedule 10.6 of the Code;
  - the preferred default assumption in clause 3A of Schedule 11.3 that an originally specified event date stands where the gaining trader does not respond and that use of revised dates should be confined to exceptional circumstances; and
  - clause 4(5) of Schedule 11.2 going beyond deemed consent and in effect denying gaining traders the same right to reject as any other trader, exercisable within a short window after it receives notice under clause 3(1)(b), and subject to the same duty in clause 4(4) not to unreasonably reject.

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

Nāku noa, nā

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