

Thank you for the opportunity to provide some high level comments on the Authority's consultation paper "*Improving visibility of competition in the over-the-counter contract market: consultation on updates to clause 2.16 notice*" published on 4 August 2026. We note the following

MEUG support's the Authority undertaking monitoring of requests and responses to market participants requests for over-the-counter contracts. It is important that large industrials' have access to a competitive OTC market, that there is transparency of the offers available, there is no undue discrimination in offers made, and whether the offers presented to participants broadly reflect the underlying costs of meeting these contracts. We noted this is our submission to the Authority on [28 May 2025](#).

- We support the Authority making improvements to the notice to provide clarity and ensure that the Authority has the necessary information to monitor the OTC market. From our reading of the paper, it is clear that the current information is not sufficient for the Authority to fully undertake this monitoring role.
- As this information is commercially sensitive, it is important that this information continues to be kept private and stored securely, so not to influence negotiations between market participants or reveal commercially sensitive market information. It is important that the disclosure of this information does not negatively impact negotiations.
- We understand the Authority would like to extend the definition of industrial consumers to capture a broader set of participants than it currently captures. It would have been useful for the Authority to give readers an estimate of the participants currently captured by the existing notice and those intended to be captured under the amendment. This would enable readers to get a clear idea of the scale of this change and to better judge the benefits therefore of this change. Gathering this information does have an administrative cost for businesses, which does need to be reflected.
- It would have also been helpful to understand the number of energy brokers that are intended to be captured now by this notice, to illustrate the costs and benefit of the change.
- To ensure these changes are workable, MEUG is happy to host a meeting between Authority staff and our members to discuss the detailed changes and to test that they are workable from a large industrial users' perspective. Please reach out to us if this would be helpful,

Kind regards,



Major Electricity Users' Group

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