

To: The Electricity Authority
consumer.mobility@ea.govt.nz

From: Electricity Engineers' Association of NZ

Date: 12 November 2025

Subject: EEA Submission – Consultation Paper – *Improving Electricity Billing in New Zealand*

OVERVIEW

The Electricity Engineers' Association (EEA) welcomes the opportunity to comment on the Electricity Authority's consultation paper *Improving Electricity Billing in New Zealand (October 2025)*.

The EEA represents engineers, asset managers, and technical practitioners from across the electricity supply industry, including all electricity distribution businesses (EDBs), Transpower, and sector service providers. While our members focus on the technical and operational aspects of the electricity system, we share the Authority's commitment to ensuring that consumers have confidence in the services they receive, and the information provided to them.

Our submission is limited to matters relating to consumer protection and education, which we consider central to achieving enduring consumer trust and engagement.

Supporting Consumer Protections

The EEA strongly supports measures that strengthen consumer protections and improve the clarity and reliability of information received by customers. Transparent communication and clear rights are essential foundations of trust in the electricity market.

In this context, the EEA endorses the Authority's proposal to limit back-billing to six months for residential and small-business consumers. This aligns with international good practice and provides a clear safeguard against unexpected large bills. Linking this back-billing cap to the Consumer Care Code and existing metering and data-quality obligations will ensure accountability is placed with the appropriate party when errors occur.

To complement these protections, clear guidance should be provided on how retailers communicate billing errors, credit adjustments, and remediation steps. Effective communication in these situations is a critical element of maintaining consumer confidence and perceived fairness.

Building Consumer Education and Understanding

In parallel with regulatory protections, investment in consumer education and engagement will be key to helping people make informed choices and benefit from a changing electricity market.

Consumers increasingly interact with new technologies—smart meters, solar, batteries, EVs, and flexible tariffs—and need accessible information to understand how their behaviour affects costs and system outcomes. Well-targeted education programmes, developed in partnership with industry and community groups, can help demystify electricity use and empower households and small businesses to engage confidently.

The EEA encourages the Authority to continue supporting initiatives that build energy literacy, promote understanding of electricity consumption, and provide tools for consumers to compare and assess options. These activities will underpin future participation in time-varying pricing and flexibility services, helping ensure reforms deliver tangible benefits for consumers and the wider system.

Implementation and Collaboration

Successful implementation of any new consumer protections or education initiatives will depend on collaboration between the Authority, retailers, distributors, and consumer advocates. We recommend establishing a joint industry–Authority working group to oversee rollout, communications, and evaluation, ensuring consistency of messages and continuous improvement based on consumer feedback.

Conclusion

The EEA supports the Authority’s initiative to strengthen consumer protections and improve understanding of electricity use. By investing in education and clear, enforceable safeguards—such as back-billing limits and transparent communication—New Zealand can enhance consumer trust and engagement while preparing for future changes in the electricity market.

The EEA looks forward to ongoing collaboration with the Authority to ensure these outcomes are achieved.

Contact

The EEA's contact person for this submission is Dr Stuart Johnston, Lead Advisor Engineering & Technical [REDACTED]