

# Submission

## Non-Discrimination Obligations

24 March 2026



Fonterra welcomes the opportunity to provide input to the Electricity Authority's consultation on Non-Discrimination Obligations.

Fonterra is a dairy co-operative owned by over 8,000 New Zealand farming families with 28 manufacturing sites across the country, making us the country's largest exporter and a major supplier of dairy products to the domestic market.

With manufacturing operations spread throughout New Zealand, Fonterra is a major electricity user. We rely on stable and affordable access to electricity to support our operations. This reliable affordable access underpins New Zealand's export competitiveness.

Fonterra supports the work of the EA to ensure that there is a level playing field for all market participants. The ability of gentailers to operate their retail businesses at a loss while making significant overall profits from generation assets has the potential to undermine competition in the market.

As such, Fonterra supports the Retail Price Consistency Assessment (RPCA) methodology, though we recommend backward-looking analysis to provide greater certainty and reduce reliance on assumptions. We agree with the proposal to implement as soon as possible. We acknowledge the need for customer segmentation into residential, commercial and industrial categories.

Specifically on non-discrimination obligations, Fonterra supports option 2 to require non-discriminatory access to risk management contracts. Gentailers should be required to ensure capacity is offered to all reasonable requests.

We recommend the EA considers these matters.