



Brief feedback - Non-discrimination obligations

From Karen Boyes <[REDACTED]>
Date Tue 24/03/2026 4:44 PM
To Level playing field <levelplayingfield@ea.govt.nz>
Cc [REDACTED]; Tim Sparks <Tim.Sparks@ea.govt.nz>; Hayden Glass <Hayden.Glass@ea.govt.nz>

Good afternoon,

MEUG has not had the time to prepare a full submission, but has the following high-level comments on the Electricity Authority's (Authority) consultation paper "*Non-discrimination obligations: Retail Price Consistency Assessment, uncommitted capacity and other matters*" published on 26 February 2026. MEUG:

- Notes that the RPCA is initially focused on mass-market customers and that commercial and industrial customers are not included within the first iteration of the RCPA. We believe further discussion is required on how C&I customers could be properly considered through this assessment, noting that the Authority has a number of other broader actions underway to scrutinise the price of contracts made available to businesses (i.e. OTC monitoring). MEUG welcomes the opportunity to discuss this further with Authority staff, when it turns to this issue.
- Support's the Authority reviewing its definition of "uncommitted capacity" given the strong lack of support from submitters. We are broadly comfortable with Option 2, which would see the concept of uncommitted capacity amended to refer to risk management contracts.
- Is cautious about the level of audit requirements that the Authority proposes to place on gentailers, recognising that the compliance cost and time from this audit must be balanced against the benefits the Authority expect to gain from this process. Audit firms may have a clearer view on the cost and benefits this may add to the proposed regime.

Kind regards,



**Major Electricity
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