

31 July 2025

Julia Hall
Manager, Monitoring Projects
Electricity Authority
PO Box 10041
WELLINGTON

Sent via Electricity Authority [information portal](#)

Dear Julia

Improving visibility of competition in the OTC contract market

1. This is a brief submission from the Major Electricity Users' Group (MEUG) on the Electricity Authority's (Authority) consultation paper "*Improving visibility of competition in the over-the-counter contract market: additional consultation on clause 2.16 information notice*"¹ published on 17 July 2025.
2. This submission does not contain any confidential information and can be published on the Authority's website unaltered. Members may lodge separate submissions.

Welcome extension of contracts captured through proposed notice

3. MEUG support's the Authority's proposal to expand the scope of the proposed notice to collect information from non-integrated generators. As noted in our initial submission,² we believe the Authority's proposed notice should capture the broadest set of information and we support inclusion of non-integrated generators as well as requests via brokers.
4. In addition, we support the Authority's second proposal to capture sell requests in addition to buy requests. We agree that this will ensure more comprehensive information and consequently enable better monitoring of behaviour and contract outcomes. MEUG also welcomes the other changes proposed in Table 2 of the consultation paper, which are intended to clarify and better define the information that is to be captured.
5. With the proposed expansion of the information to be collected and monitored, it becomes even more critical that the Authority ensure that all this confidential and highly commercially sensitive information is securely stored and managed through robust processes. It is critical that no individual parties are identified and that the information is not used for unintended purposes, negatively impacting the market. MEUG would welcome further discussion directly with Authority staff around this process.

¹ https://www.ea.govt.nz/documents/7853/Improving_visibility_of_competition_in_the_OTC_contract_market_-_additional_co_dZbTnxX.pdf

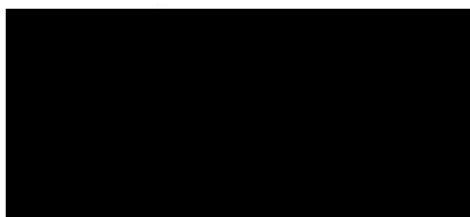
² [Improving visibility of competition in the OTC contract market](#), MEUG submission to the Electricity Authority, 28 May 2025.

6. Finally, in the consultation paper, the Authority asserts that it has “*defined the scope of the proposed amended notice more tightly to help minimise implementation costs*” and believes that “*costs are relatively low for most participants.*” This is a positive improvement, but we remain disappointed that the Authority has still not provided a quantified analysis or estimate of the actual costs (and benefits) of this proposal.

Next steps

7. If you have any questions regarding our submission, please contact MEUG on [REDACTED] or via email at [REDACTED]

Yours sincerely



Karen Boyes
Major Electricity Users' Group