

10 July 2025

Submissions
Electricity Authority
Level 7, AON Centre
1 Willis Street
Wellington 6011

Via email: digitalisation@ea.govt.nz

ERGANZ SUBMISSION ON OUR FUTURE IS DIGITAL

The Electricity Retailers' and Generators' Association of New Zealand ('ERGANZ') welcomes the opportunity to provide feedback on the Electricity Authority's paper 'Our future is digital'.

ERGANZ is the industry association representing companies that sell electricity to Kiwi households and businesses. Collectively, our members supply almost 90 per cent of New Zealand's electricity. We work for a competitive, fair, and sustainable electricity market that benefits consumers.

Submission Points

ERGANZ welcomes the Authority's paper, which continues the conversation about how digitalisation can support a smarter electricity system for the benefit of consumers. The paper rightly identifies the transformative potential of improved data visibility, greater interoperability, and simplified engagement. These themes are broadly aligned with ERGANZ's vision for an electricity market that delivers innovation, choice, and affordability for all New Zealanders.

At the same time, ERGANZ believes that the paper reflects a relatively high-level view of the challenges and opportunities involved. While it talks about a future system in which consumers actively manage their electricity use and participate seamlessly in new products and services, it gives less attention to more pressing issues consumers face today. Many households and small businesses still require education to understand their bills, compare plans, or switch providers - this is the focus of various ERGANZ efforts, including EnergyMate, Power Credits, and Powering Change.

As the industry body representing electricity retailers, ERGANZ supports the direction of travel outlined in the paper. Retailers are at the coalface of customer interaction. We talk daily with thousands of New Zealanders who want the lights to come on and to get value from their electricity services. Digitalisation has a vital role to play in delivering better services, but the implementation must be grounded in the realities of today's system as well as its future possibilities.

Progressing current workstreams, including retail market monitoring and open electricity will, over time, help consumers make better decisions. For consumers, streamlining access to usage data will help provide greater information to the highly engaged consumers who wish to seek it out.

We also support the Authority's focus on improving data visibility and enabling interoperability across the sector. However, we urge a careful approach to implementation. The regulatory design must take account of commercial factors, especially where retailers have made significant investments in consumer-facing tools, apps, and innovation. It must also avoid creating asymmetries in obligations, for example, where retailers are required to disclose derived data or systems while access to network-side data remains limited or poorly digitised. A level playing field is essential for fair competition and efficient innovation.

Similarly, the Authority's work to support a more decentralised and flexible energy system needs to be matched with clear expectations about roles and responsibilities. Consumers will only be empowered to participate if the tools, protections, and incentives are in place, and if their experience of doing so is straightforward and trustworthy. In addition, consumer protections must keep pace with emerging risks around data sharing, cybersecurity, and automated decision-making.

Retailers are already deeply engaged in helping consumers understand and navigate their electricity use. For example, engaging consumers in new ways, such as through interactive apps. Retailers are well-positioned to continue that role, but they need an appropriate regulatory environment rather than further regulations aimed at simplifying paper bills that are used less and less.

In conclusion, ERGANZ sees Our Future is Digital as a constructive step. We encourage the Authority to follow the emerging digital trends in the sector, but to give greater weight to the practical changes that will deliver meaningful improvements for consumers.

Consultation Questions

1. What could stop or slow digitalisation of the electricity system? What would make it successful? How far should digitalisation go?

Progress and innovation rely on the market being allowed to develop products and services that consumers want, at a price that consumers are prepared to pay. Market participants should have choices about the level of engagement they have in new digital products and services, as consumers will ultimately choose how much engagement they want.

Digitalisation should go far enough to enable greater consumer agency and efficiency, but not so far as to overcomplicate choices or leave less digitally engaged consumers behind. The focus must remain on outcomes: an electricity system that is more responsive and fair for all New Zealanders.

2. Do you agree with how we have defined 'data' and 'information', especially in the context of making data more visible?

ERGANZ broadly agrees with the distinction made between ‘data’ as raw facts and figures and ‘information’ as processed, meaningful insights. This is a useful framing for considering how value is created in the electricity system.

However, it is important to recognise that raw data can still have commercial sensitivity and may involve material investment in its collection, storage, and management, particularly by retailers. Visibility initiatives should not assume that all raw data can or should be made open without careful consideration of privacy, commercial, and cybersecurity implications.

We support choices regarding increased visibility where it improves outcomes for consumers and the system, but this must be governed by clear access, consent, and use frameworks that respect legitimate commercial interests.

3. What data do you think needs to be more visible?

Improving consumer access to their own consumption data, as already proposed through several workstreams including retail market monitoring and open electricity, will support more effective decision-making by consumers and support the use of energy management tools. However, this should be enabled through consent-based frameworks that protect consumer privacy and maintain trust.

Additionally, improved visibility of network data, particularly at the low-voltage level, where current gaps limit efficient planning and constrain innovation. Greater transparency around network capacity, constraints, and outage information would enable better coordination between retailers, distributors, and emerging service providers.

4. What challenges do you think we might face in trying to increase visibility? What considerations need to be given to data privacy or cybersecurity? How could increasing visibility create more opportunities for consumers, participants and innovators?

Increasing visibility will face challenges around data ownership, consent, and commercial sensitivity. Market participants have invested significantly in systems and tools that rely on data, and any visibility regime should avoid undermining incentives for continual innovation or exposing competitive strategies.

From a consumer perspective, privacy and cybersecurity are paramount. Consent must be clear, robust, and easy to use, and protections must be in place to prevent data misuse or breaches, especially as data flows become more complex and more third parties are involved.

5. What work are you planning or doing to increase visibility within the electricity system? Are you aware of any work that contributes to this goal?

ERGANZ members are all actively working to improve data visibility for their consumers through a range of initiatives. These include enhancing consumer access to usage data, improving data-sharing processes with third-party service providers, and supporting the development of inhouse or third-party tools that support plan comparison, budgeting, and energy management.

6. What challenges do you think we might face in increasing interoperability? What other opportunities do you think greater interoperability will bring?

7. What work are you planning or doing to increase interoperability within the electricity system? Are you aware of any work or research that contributes to this goal?

The main challenges in increasing interoperability lie in the diversity of legacy systems, the cost and complexity of integration, and the lack of common technical standards across industry participants. All retailers, including smaller retailers, may face significant challenges in adapting to new interoperability requirements without phased implementation.

Another risk is that compulsory interoperability participation could disproportionately burden retailers, especially if retailers are pursuing alternative arrangements based on the needs of their customers.

8. What challenges do you think we might face in simplification? How could simplifying create more opportunities?

9. What work are you planning or doing to increase simplification within the electricity system? Are you aware of any work that contributes to this goal?

Simplification has trade-offs. The paper underplays the tension between simplification and complexity, and the reality that different consumers have different preferences. Some value simple, easy-to-understand products and billing, while others prioritise control, optimisation, and customisation, even if that brings complexity.

The Authority needs to recognise this diversity and ensure the market can support a range of offerings, rather than pushing for uniformity. For example, what is the objective of requiring “consistency of power bills across retailers” when most consumers engage with their retailers in other ways through websites or apps, particularly when these are interactive and will become even more so when AI tools are further integrated into surfacing relevant consumer information.

The best consumer outcomes will come from supporting tiered solutions, where customers can opt into the level of engagement and complexity that suits them best.

Conclusion

ERGANZ looks forward to working with the Authority, including the development of a digitalisation roadmap and further consultation on the regulatory and operational settings that will support choice in a modern, efficient, and consumer-friendly electricity market.

ERGANZ would like to thank the Authority for considering our submission.

Yours sincerely,

Kenny Clark
Policy Consultant