

Appendix B Submission form

Evolving multiple trading relationships and switching – supplementary consultation

Please email your submission to policyconsult@ea.govt.nz by 5pm, Tuesday 17 February 2026.

Name	Briony Bennett, Senior Energy Innovation Manager
Organisation	Ara Ake

Questions	Comments
Q1. Do you have any comments on our revised proposal for MTRs?	<p>Ara Ake is supportive of the revised proposal on the basis that it is simpler, more cost-effective, and quicker to implement, unlocking benefits for consumers sooner.</p> <p>We are supportive of accelerating the timeline for implementation sooner than the 18-month period originally identified in the previous consultation, as noted in paragraph 2.14 in the supplementary consultation paper.</p>
Q2. Is there further information you can provide that may improve the evidence base for our assessment of (a) costs and/or (b) benefits?	<p>In the supplementary consultation paper, the Authority notes there are likely additional benefits from MTRs that cannot easily be quantified, which Ara Ake agrees with.</p> <p>Ara Ake agrees these additional benefits would accrue if, for example, virtual power plants became more commonplace and consumer uptake of batteries increases (as per paragraph 3.31 in the supplementary consultation paper).</p> <p>Ara Ake also agrees that MTRs would unlock more affordable energy for some consumer groups, in particular those living in social or shared housing, and could create opportunities for even broader sectors, in particular those living in rental properties (as per paragraph 3.14-15 in the supplementary consultation paper).</p> <p>Ara Ake is actively working with stakeholders and partners in this space to deliver innovative MTRs solutions that support equity outcomes. The revised proposal to implement MTRs in the Code in the supplementary consultation paper will help to unlock these innovation opportunities.</p>
Q3. Do you agree the benefits of the proposed Code amendments are likely to outweigh the costs? If not, please explain why not.	<p>Ara Ake agrees that the benefits of the proposal are likely to outweigh the costs. These benefits may even be greater than what has been quantified by Sapere in the CBA for this supplementary consultation paper, in light of our response to Q2 above.</p> <p>As noted in paragraph 3.13 in the supplementary consultation paper, Ara Ake receives frequent requests for support to implement MTRs solutions and encounters significant demand for the solutions MTRs can bring and the benefits to a wide and diverse group of stakeholders, including iwi, social and community housing groups, and businesses.</p>