

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.

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Organisation	Total Instrument Services

Questions	Comments
Q1. Do you have any comments on our revised proposal for MTRs?	It is a good idea in principal, but the challenge becomes how controls the hardware and when it is deployed. There will be a conflict between the expected behind the meter resilience vs the aggregated revenue opportunity.
Q2. Is there further information you can provide that may improve the evidence base for our assessment of (a) costs and/or (b) benefits?	Understanding the flows in and out after onsite consumption will help to quantify the energy volumes. But customer expectation of resilience or control due to ownership of the asset will be hard to test. Your are talking about the ability to contract the excess and gain greater revenue than the spot price would other whys offer. From a wholesaler prospective if the spot price is cheaper then the off take from the MTR then there is no incentive. Also if the contract period is short or can be exited easily there is additional risk. Can you model the projected sell vs the spot at that time and provide a case to overcome the contract risk? Then add the cost of the implementation is the delta enough to satisfy a basic investors expectation?
Q3. Do you agree the benefits of the proposed Code amendments are likely to outweigh the costs? If not, please explain why not.	No as mentioned above I don't believe the market actually exists in practice as most retailers already offer better than spot price to buy the energy produced. They are quantifying and managing the difference. The better situation is purchasing all the energy under PPA and agreeing a discounted buy price for all energy consumed beyond. This is kind of how it is done now. The only change would be longer contract period so supply and demand books can be managed. and also who pays the additional cost is it reflected in greater lines charges from both retailers?