



9 March 2026

Electricity Authority
PO Box 10041
Wellington 6143

Via email: policyconsult@ea.govt.nz

Consultation Paper – Evolving multiple trading relationships and switching supplementary

The WEL Networks appreciates the opportunity to provide feedback on the above consultation.

WEL Networks (WEL) is New Zealand's sixth largest electricity distribution company and is 100% owned by our community through our sole shareholder WEL Energy Trust. Our guiding statement of strategic intent is to be leading Waikato's energy future, and we work to ensure that our customers have access to reliable, affordable, and environmentally sustainable energy.

Generally WEL supports the process changes to switching procedures as they are likely to improve over efficiency to the processes, although we doubt the changes will significantly reduce the number of switching complaints as generally these relate to some underlying issue rather than the switching procedure.

We are less convinced that the multiple trading regime will deliver the benefits described, so support any changes that reduce to overall implementation costs (which will ultimately be borne by all consumers, not just those who may take up multiple trader options). It is noted that the revised proposal does nothing to reduce the implementation and operational costs for distributors or MEPs who have no possibility to opt out and must be able to accommodate if even a single consumer makes use of multiple trading.

Our responses to the specific questions sought by the Authority are attached and should you require clarification on any part of this submission, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in blue ink that reads 'Andrew Maseyk'.

Andrew Maseyk

Regulatory Specialist

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Questions	Comments
Q1. Do you have any comments on our revised proposal for MTRs?	<p>WEL agrees that the revised process seems to offer retailers reduced implementation activity, particularly as they have the option not to actively participate in the regime (though even non participating retailers will have to at least introduce monitoring activity). It should be noted though that this does not reduce EDB or MEP implementation costs.</p> <p>These participants do not have the ability to disengage so will have to adopt systems to accommodate the possibility of even a single customer in the network/with their metering engaging with multiple traders.</p> <p>Additionally the revised process is focused on the identification of traders in the Registry and as such does nothing to improve the processes around ongoing operational matters such as separation of billing (which may necessitate a doubling of price categories for EDBs), notification of planned outages, application of discounts etc.</p>
<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> <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>	<p>Multiple Trading: While it follows that if there is an increase 0.36 – 1.77% of battery discharge the deemed costs of the scheme would be covered, there does not seem to be any assessment of what movement could be realistically expected in injection prices paid to consumers and whether this would be sufficient to deliver the battery capacity increase required. Nor does there seem to be any discount for organic growth in battery capacity that would deliver increasing benefit without the need for the MTR scheme.</p> <p>The EA should consider the current consumer switching apathy (seemingly leaving large savings on the table) as a cautionary tale that the vast majority of consumers may not behave in an economically rational way.</p> <p>Switching: We agree the proposed changes will provide efficiency gains in the processes mainly due to the standardisation of manual processes. The assessment of the reduction in switching complaints does seem to be overstated. From experience many complaints labelled as switch complaints are due to some underlying issue (long term estimate billing, ICP/meter mismatch, meter issues etc) that come to the fore during the switching procedure. Changes to the processes (which the consumers are generally blind to) are unlikely to do anything to address these problems.</p>

