



14 April 2026

Electricity Authority

By email to: [wholesaleconsultation@ea.govt.nz](mailto:wholesaleconsultation@ea.govt.nz)

Tēnā koe

## **Response to: “Reducing the post-default exit period by four days to small retailers”**

While we recognise the benefits in this change for small retailers, we would like to raise some matters on the industry efficiency and customer relationship view, relevant to Contact Energy and all other retailers.

We appreciate the intent of the proposal to reduce the post-exit period, and the associated reduction in prudential requirements. However, tighter timeframes can interact with existing Code requirements in ways that may make implementation more challenging, particularly where multiple steps need to be completed within a compressed period.

To ensure that shorter timeframes are workable, we recommend that the Authority consider simplifying elements of the trader default process more broadly.

For example, we believe enabling greater use of the standard BAU switching process post ICP allocation, where the defaulting retailer can support it, would be beneficial. I.e. new retailers initiate switch requests, and the defaulting retailer completes in registry. In recent default events, retailers advised that they were capable of completing switches themselves. Therefore, this approach can reduce overall timeframes, minimise manual intervention across all parties, and support a better experience for customers.

We appreciate the Authority’s ongoing engagement with industry on these matters and value the opportunity to raise these suggestions with you. We recognise the important role your team plays in this process, and we thank you for taking the time to consider these suggestions.

Ngā Mihi

A handwritten signature in blue ink, appearing to read "Brett Woods".

Brett Woods

Head of Regulatory and Government Relations

Contact Energy