Improving Consumer Access and Choice

Issues paper

30/06/2026

ELECTRICITY AUTHORITY
TE MANA HIKO

Executive summary

Access and choice are core features of a well-functioning electricity market

Meaningful consumer choice is fundamental to an effective and competitive electricity market. New Zealand's electricity market is designed to deliver benefits through competition, innovation and choice. However, the market cannot deliver these benefits fully if some consumers cannot access supply, switch retailers or participate in new services.

Most consumers can access a range of power companies and plans. Many are also beginning to benefit from new services, technologies and business models. However, preliminary evidence suggests some consumers may face barriers to accessing retail electricity services or exercising meaningful choice.

This issues paper seeks information, insights and evidence on whether current arrangements are delivering the outcomes New Zealanders expect for consumers whose access to electricity or choice of power company or service may be constrained.

Some consumers may face barriers to access and choice

The paper focuses on two factors that may be constraining access and choice for electricity consumers:

- **credit history and retailer credit-risk assessment:** some consumers with adverse or limited credit history may be declined standard post-pay electricity supply and may need to rely on a narrow set of alternatives, such as prepay, social retailing or exceptional onboarding processes.
- **access to communicating smart metering:** consumers with legacy or non-communicating smart meters may be unable to access some services including prepay, social retailing, time-varying pricing, flexibility services and other emerging retail products.[1, 2]

Consumers facing both credit-related barriers and metering constraints may have very limited pathways to retail electricity supply, and in some cases, no practical access at all. A key issue is not just the existence of options, but whether people can realistically access and sustain a plan that works for them.

These barriers may also be difficult to identify through existing market data, complaints or formal consultation channels. As a result, some impacts may remain hidden from the wider system.[3]

This issues paper seeks to better understand both the measurable evidence and the lived experience of consumers whose access to electricity and retail choice may be constrained.

We are seeking evidence before considering future options

The issues discussed in this paper are complex and extend beyond the role of any single organisation. They sit at the intersection of retail competition, consumer participation, technology uptake, financial inclusion, health, housing and broader social outcomes.

This work seeks to build a shared understanding of the issues before considering whether further action may be warranted, and what role may be appropriate for the Authority, retailers, metering providers, government agencies, iwi, consumer advocates and community organisations.

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[1] A legacy meter is an analogue electricity meter that requires manual reading and does not support remote communication or advanced pricing and now represents only a small share of total meters.

[2] A smart meter is an electricity meter using Advanced Metering Infrastructure (AMI) that records usage electronically and is capable of remotely transmitting data and more flexible pricing.

[3] *Research into hard-to-reach customers living in hidden hardship*, February 2024

The Authority is specifically seeking views and evidence on:

- the scale and nature of any barriers to access and choice
- the effectiveness of existing alternative pathways
- whether some consumers experience poorer outcomes because of constrained access or limited choice
- the outcomes New Zealanders expect for consumers facing these circumstances
- whether there may be opportunities to strengthen access, choice and participation.

This work builds on existing action across the sector

The Authority recognises that retailers, metering providers, networks, government agencies, community organisations and consumer advocates already take a range of actions to support consumers facing hardship. These include targeted support, flexible payment arrangements, social retailing models, metering upgrade programmes, consumer advocacy and pilot initiatives to increase outreach to consumers in hardship.

This paper builds on the Authority's work to protect and empower consumers, including the Consumer Care Obligations, improved billing requirements, the new comparison and switching site Billy, and foundational work to improve access to electricity product and consumption data.

It also asks whether further work may be needed to ensure all consumers have reasonable pathways to electricity supply and meaningful opportunities to participate in the retail market.

Next steps

Consultation is open now and closes at 5pm on Tuesday 11 August 2026. To support broader participation, the Authority has prepared a consumer-friendly survey for consumers and community organisations to provide feedback.

In parallel with public consultation, the Authority plans to undertake research to hear directly from people affected by access and choice issues. This will help us better understand lived experiences and the practical impacts of current market settings.

After reviewing all findings, the Authority will consider next steps, which may include further work on regulatory or non-regulatory options to improve consumer access and choice.

We also encourage all submitters to share our consumer survey with their customers or networks.[4]

[4] https://www.ea.govt.nz/your-power/consumer-access-and-choice/survey/

Contents

1 Purpose of this consultation

1.1 This paper seeks feedback and evidence from consumers, retailers, consumer advocates, social service agencies, metering providers and other stakeholders. Its purpose is to test our understanding of consumer barriers to access and choice and the scale and impact of these barriers, and to identify potential avenues to address them.

1.2 This consultation is an opportunity to bring perspectives together, to build a shared evidence base and to assess whether there is common understanding of the issues, the outcomes consumers should be able to expect, and the roles different organisations may appropriately play.

1.3 This paper does not propose preferred solutions nor predetermined regulatory interventions. It seeks views on the evidence, the effectiveness of existing pathways and support mechanisms, and whether further work may be needed. This paper:

(a) identifies some of the key factors that may be constraining access to electricity and retail choice

(b) explores existing pathways to electricity supply and availability of options under current market conditions

(c) considers the risks faced by consumers with limited access and choice

(d) identifies evidence gaps and areas where further information is needed

(e) seeks views on what outcomes consumers should reasonably be able to expect where access or choice may be constrained

(f) seeks ideas and options to address risks faced by consumers with limited access and choice

(g) outlines the Authority's proposed next steps following consultation.

2 What you need to know to make a submission

How to make a submission

2.1 The Authority's preference is to receive submissions in a Word document in the format shown in Appendix A.

2.2 Submissions should be emailed to consumer.mobility@ea.govt.nz with 'Consultation - Improving Consumer Access and Choice' in the subject line by 5pm, on 11 August 2026.

2.3 The Authority will confirm receipt of all submissions.

2.4 If you cannot send your submission electronically, please call 04 460 8860 to discuss alternative arrangements.

2.5 We will publish all submissions. If you consider that we should not publish any part of your submission, please:

(a) indicate which part(s) should not be published and explain why

(b) provide a version of your submission that we can publish (if we agree not to publish your full submission).

2.6 All submissions, including any parts the Authority does not publish, can be requested under the Official Information Act 1982. This means the Authority would be required to release material not published unless good reason existed under the Act.

Structure of this consultation

2.7 Submitters do not need to answer every question. We welcome responses to any questions relevant to their experience, evidence or area of expertise.

2.8 To support readers in navigating the document, section summaries and question boxes are presented throughout in the following format:

Questions
Blue boxes present key questions to capture your views.

Summary
Yellow boxes indicate a summary of each chapter or proposal.

Respond to our consumer survey

2.9 In addition to making a written submission, another avenue for providing feedback on this consultation is via the survey, available here: https://www.ea.govt.nz/your-power/consumer-access-and-choice/survey/

Targeted research and engagement with impacted consumers

2.10 The Authority plans to engage a research partner to speak directly with consumers affected by the issues raised in this paper. This research will focus on consumers' journeys and experiences, including the barriers they have faced when trying to access electricity supply, their options, and the impacts of these on their household circumstances.

2.11 This work is intended to ensure that consumer voices, including those we may not usually hear through formal consultation processes, help inform the Authority's understanding of the issues and any potential responses.

3 Electricity access and choice enable reliable service at lowest cost for New Zealand's consumers

3.1 Access to electricity and meaningful consumer choice are core conditions for a well-functioning retail electricity market. Consumers need to be able to obtain and maintain electricity supply, compare options, switch retailers and choose plans that meet their circumstances.

3.2 Where consumers face barriers to access or choice, the impacts can be significant. These consumers may have higher costs, greater exposure to disconnection risk, reduced ability to manage bills and less opportunity to benefit from innovation, time-varying pricing, flexibility services, and emerging technologies.

3.3 These issues matter for consumer protection, competition, reliability and efficiency. A market cannot deliver reliable service at lowest cost over time if some consumers are unable to participate effectively, or if access to essential retail services depends on narrow, fragile or exceptional pathways.

Electricity underpins our everyday life

3.4 Electricity plays a fundamental role in the lives of New Zealanders. It supports heating, cooling, lighting, food storage, communications, education, employment, transport and access to digital services. Reliable access to electricity enables households and businesses to participate fully in modern economic and social life.

3.5 For some consumers, electricity is particularly important for health, safety and wellbeing. This includes medically dependent consumers who rely on electrically powered medical equipment or require electricity for medical treatments. For these consumers, loss of electricity supply can create immediate and serious risks.

Choice supports retail competition, affordability and better service

3.6 Competition in New Zealand's electricity market delivers long-term benefits for consumers. Effective competition encourages retailers to innovate, improve service quality, manage costs effectively and offer products that meet different consumer needs.

3.7 Consumer choice is a key part of this process. Consumers who can compare offers, switch providers and select products that suit their circumstances help strengthen competitive pressures across the market.

3.8 However, competition only delivers these benefits where consumers can participate. If some consumers cannot access standard retail services, cannot switch, or have only one practical pathway to supply, then the benefits of competition and innovation may not reach them.

3.9 The Authority's role is to promote competition in, reliable supply by, and the efficient operation of the electricity industry for the long-term benefit of consumers. The Authority also has an additional objective to protect the interests of domestic and small business consumers in relation to electricity supply.

Consumer participation is increasingly important

3.10 The electricity sector is rapidly evolving. New technologies, including smart appliances, batteries, electric vehicles, distributed generation and digital energy services, are creating new opportunities for consumers to manage their electricity use and costs.

3.11 Time-varying pricing and demand flexibility services are also becoming more important tools for supporting efficient use of the electricity system, particularly as demand grows and more renewable generation connects to the system.

3.12 The ability to participate in, and benefit from, these changes can depend on access to suitable retail products, metering capability and digital services.

The Authority's work to support and protect consumers

3.13 The Authority has recently delivered a significant programme of consumer-focused work to strengthen consumer protections, improve information and support better consumer participation and competition in the retail market. This includes:

(a) introducing the Consumer Care Obligations, which set minimum standards to support consumers to stay connected and manage their power bills

(b) launching the Authority-funded comparison and switching service Billy to make it easier for households to compare plans and take control of their power costs

(c) introducing Code requirements to protect consumers by improving electricity bills, preventing large back bills and requiring retailers to regularly check their customers are on the best plan they offer

(d) standardising billing information and product data supporting consumers to make more reliable and accurate savings estimates.

3.14 This issues paper builds on that work by asking whether there are remaining barriers that prevent some consumers from accessing electricity supply or exercising meaningful choice, and whether further evidence, coordination or action may be needed.

Why these issues are important now

3.15 The Authority is considering these issues now because several factors suggest access and choice may require closer examination.

(a) Preliminary evidence from the Authority's monitoring, stakeholder engagement, previous submissions and sector engagement suggests that some consumers may be declined standard post-pay electricity supply, may have limited practical alternatives or may be unable to access some products because of metering constraints.

(b) The Ministry of Business Innovation and Employment's most recent *Report on Energy Hardship Measures* showed a significant number of households were impacted by energy hardship.[5] Groups such as renters, those on low incomes, and single parent households were found to be more likely to experience energy hardship.

(c) Affordability pressures remain significant for many households. The Authority's *2025 Consumer Perceptions and Sentiment Survey* shows that around four in 10 residents are not confident they can afford to pay their power bill over the next six months.[6] Rising electricity costs, wider cost-of-living pressures and consumer sentiment about affordability mean that barriers to access and choice may have more serious consequences for consumers experiencing hardship.

(d) As the retail market evolves and more value is delivered through digital services, smart meters, time-varying pricing, flexibility products, and data-enabled comparison and switching, consumers who cannot access those services may become increasingly excluded from the benefits of innovation and competition.

[5] Ministry of Business, Innovation and Employment, Report on energy hardship measures – Year ended June 2024, 2025

[6] Electricity Authority, *2025 Consumer Perceptions and Sentiment Survey* Report, 11 March, 2025.

(e) This work follows the implementation of major consumer reforms by the Authority. The Consumer Care Obligations, billing improvements, and comparison and switching work provide a stronger foundation for consumer participation. This is an appropriate time to test whether additional barriers remain for consumers whose access or choice may still be constrained.

How these issues were identified

3.16 Following implementation of the Consumer Care Obligations, the Authority undertook a prioritisation process to identify the most significant remaining consumer issues requiring further policy consideration.

3.17 This process included reviewing previous Authority consultation submissions, analysing emerging retail market monitoring data and market trends, and reviewing outstanding Electricity Price Review and the Energy Hardship Expert Panel recommendations.[7,8]

3.18 It also involved engaging with a wide range of stakeholders including consumer advocates, retailers, metering equipment providers (MEPs), Utilities Disputes Limited, government agencies and the Electricity Authority Advisory Group.

3.19 Through this process, access to electricity supply and meaningful consumer choice was selected as a high priority consumer issue requiring further consultation and consideration.

[7] Ministry of Business, Innovation and Employment, *Electricity Price Review: Final Report*, 2019

[8] In 2025, the Authority introduced mandatory monthly reporting for retailers on domestic and small business customer data, to increase transparency and accountability in New Zealand's retail electricity market.

4 Evidence of constrained access and choice and impacts some consumers may experience

4.1 Most consumers can access retail electricity services and exercise meaningful choice between retailers and electricity plans. These choices enable consumers to benefit from competition and help create pressure on retailers to compete on price, service quality, innovation, payment options and customer support.

4.2 However, preliminary evidence from the Authority's retail market monitoring, stakeholder engagement, previous submissions, and implementation of the Consumer Care Obligations suggests that some consumers may face barriers to accessing electricity supply or exercising meaningful choice.

4.3 This paper focuses on two factors that appear to be important constraints for some consumers:

(a) consumer credit history and retailer credit-risk assessment

(b) access to communicating smart metering technology.

4.4 This section also summarises some of the effects that constrained electricity access or an inability to maintain supply can have on peoples' lives. Electricity supports essential household services, including space and water heating, refrigeration, cooking, lighting, communications, study, employment and the operation of medical equipment.

Credit history and metering capabilities may limit access and choice

4.5 These factors affect different parts of the retail electricity market. Retailers' credit-risk assessments may influence whether a consumer can access a standard post-pay electricity service. Metering capability may influence whether a consumer can access particular retail products, pricing plans, payment options or services, including prepay and time-varying pricing plans.[9]

4.6 These factors may also compound. For example, a consumer who is declined access to standard post-pay supply may have limited alternatives if they cannot access prepay or other social retailing because they have a legacy or non-communicating smart meter. In these circumstances, the consumer may face a practical barrier to electricity supply, not just a reduced range of retail options.

4.7 The Authority recognises that other factors may also affect access and choice, including affordability, housing circumstances, digital access, consumer confidence, language barriers, disability, health needs and the availability of support services. The Authority has prioritised credit-related barriers and metering capability in this paper because the preliminary evidence suggests they are significant and may be affecting consumers' ability to access or participate in the retail electricity market.

4.8 The Authority is seeking to build a more comprehensive picture of the scale and impact of these issues, the number of consumers affected, the pathways currently available to those consumers and the extent to which existing arrangements are working effectively.

Consumers may experience harm where access and choice are constrained

4.9 Consumers who face constrained access to electricity supply, or limited choice between retailers and pricing plans, may experience poorer outcomes over time. The nature and

[9] Refer to paragraphs 4.32 - 4.35

severity of those outcomes will depend on the consumer's circumstances, the options available to them and the support they can access.

4.10 Potential risks include:

(a) difficulty securing electricity supply from any retailer

(b) reliance on a narrow set of alternatives, such as prepay, social retailing or exceptional onboarding arrangements

(c) higher electricity costs over time if consumers are unable to switch retailers, select a plan that better suits their circumstances or access lower-cost plans or retailers

(d) reduced ability to manage electricity costs through behavioural responses to price signals

(e) increased risk of disconnection or self-disconnection, particularly where access to standard post-pay services is restricted

(f) use of prepay arrangements by consumers for whom prepay may be unsuitable, including medically dependent consumers or consumers with health, disability, or other needs that are electricity dependent.

4.11 Some consumers may also face multiple barriers at the same time. For example, a household experiencing financial hardship may also face a limited or adverse credit history, limited digital access, housing insecurity, outdated metering infrastructure, or limited ability to negotiate with retailers.

4.12 The combined effect of these barriers may further reduce participation in the electricity market and increase risk of poor outcomes.

Q1. Do you agree with the risks identified for consumers who may have constrained access to electricity supply or limited retail choice? Please explain why or why not.

Q2. What evidence is available on the number of consumers affected by these risks, the circumstances in which they arise, and the outcomes consumers experience?

Q3. Are there particular groups of consumers, regions, housing situations or metering circumstances where these risks are more likely to occur?

Hidden hardship may make access and choice issues difficult to see

4.13 The Authority recognises that some access and choice issues may not be fully visible through existing market data, complaints processes or formal consultation channels. Some consumers with constrained access and choice are likely to be experiencing energy hardship. These consumers may not always identify their experience as a market issue, may not know where to seek help, or may choose not to engage with retailers, regulators or other institutions.

4.14 The Energy Hardship Expert Panel highlighted that energy hardship is complex and can be driven by a range of factors, including income, housing quality, health needs, household circumstances, energy efficiency and access to suitable support.[10] These factors can overlap with the access and choice issues considered in this paper. For example, a consumer with an adverse credit history may also be managing insecure housing, family violence, disability, language barriers, limited digital access or low trust in institutions.

4.15 These circumstances can make some consumers hard for the electricity system to identify or reach. In some cases, consumers may ration electricity, rely on informal support from

[10] Energy Hardship: The challenges and a way forward, Energy Hardship Expert Panel Report to the Minister, 2023

whānau or community organisations, avoid contact with retailers, use another person's account, cycle through short-term arrangements, or remain disconnected from mainstream retail options without this being clearly visible in existing information sources.

4.16 Recent community-led and industry-supported research has also emphasised that consumers described as "hard to reach" may not be hard to reach within their own communities.[11] Rather, they may be less willing to engage with electricity retailers or formal institutions because of low trust, past experiences, or wider systemic barriers. This suggests that understanding access and choice issues requires more than market data alone. It also requires listening to community organisations, consumer advocates and consumers with lived experience.

4.17 This is why the Authority is seeking evidence through multiple channels, including submissions, a consumer-friendly survey, targeted consumer research and engagement with community organisations. These channels are intended to help build a fuller picture of the scale, nature and impact of access and choice barriers, including for consumers who may not usually participate in formal regulatory processes.

Access and choice constraints may affect retail market performance

4.18 Retail electricity markets function best when consumers can compare offers, respond to price signals, switch retailers and choose products that suit their circumstances. Where some consumers are unable to participate in this way, competitive pressure may be weaker for those consumers.

4.19 Over time, this may contribute to:

(a) reduced competition for some segments of the retail market

(b) weaker incentives to develop products and services for consumers with more complex needs or higher credit risk

(c) unequal access to new technologies, pricing structures and service models

(d) greater concentration of higher-risk or higher-support consumers among a small number of retailers.

4.20 These issues may become increasingly important as the electricity sector continues to evolve and access to data, smart meters, flexible pricing and digital services becomes increasingly central to consumer participation.

Q4. Do you agree that access and choice constraints may affect retail market performance? Please explain why or why not.

Consumer credit history can affect access to standard post-pay electricity

4.21 Retailers commonly undertake credit assessments of potential customers when deciding whether to offer post-pay electricity services. Where goods and services are supplied before payment is received, it is common for businesses to consider a consumer's ability to pay, the likelihood of late or non-payment, and the potential for debt and collection costs.

4.22 Available information suggests that credit assessment practices influence access to retail electricity services for some consumers.

4.23 Information published by Centrix indicates that around 10% of credit-seeking consumers are likely to receive a credit score that makes them more likely to be refused for most credit

[11] *Research into hard-to-reach customers living in hidden hardship*, February 2024

card, loans and utility services.[12, 13] Credit scores are based on factors such as repayment history, existing accounts, defaults and credit enquiries. Lower scores indicate a higher assessed risk of non-payment.

4.24 The Authority understands credit assessment practices vary across retailers. Not all customers with low credit scores would necessarily be declined access to post-pay electricity services by all retailers and retailers may use different thresholds and decision-making processes.

4.25 Some consumers may also face challenges because they have a limited credit history rather than a poor credit history. This may include young consumers, recent migrants and others with limited engagement with credit markets who may have little or no credit record available for assessment.

4.26 Retail market monitoring data indicates that retailers recorded 46,895 refusals of post-pay electricity services on credit-related grounds during 2025. This does not represent the number of consumers affected, as a consumer may apply to and be declined by more than one retailer. However, it indicates that credit-related refusals occur at scale across the market.

4.27 For context, in the same period there were 318,209 'move in' switches and 129,708 trader switches.[14,15] This means that, across the year, there was approximately one recorded credit-related refusal for every ten completed move-in or trader switches.

4.28 Retail market monitoring data also shows that credit-related refusals are recorded across retailers of different sizes. Table 1 **Credit-related refusals of new customers in the last 12 months**provides a breakdown of customer refusals, number of completed switches, and ratio of refusals to completed switches by retailer size. This indicates that retailers accept many more customers than they decline, but that refusals are still a material practice in the market, particularly within the large and small size retailers.

Table 1 **Credit-related refusals of new customers in the last 12 months**

Retailer size (ICP[16] count)	Total number of refusals of residential consumers	Total number of completed switches	Ratio of refusals to completed switches
Large (100,000+)	31,541	345,397	1:11
Medium (10,000-100,000)	14,371	93,534	1:7
Small (1,000-10,000)	977	7,469	1:8

Source: Electricity Authority

4.29 Further information is needed to understand the factors that may influence electricity refusals, including different retailer approaches to credit assessments and thresholds, consumer credit trends over time, and whether consumers declined by one retailer are later accepted by another.

4.30 Current retail market monitoring data records the number of credit-related refusals by each retailer but does not track the individual consumers affected. This means the Authority

[12] Centrix is one of three credit reporting agencies in New Zealand. The others are Equifax and Ilion.

[13] Centrix, *Your Credit File Explained*. September 2025.

[14] A 'move in' switch is where a customer is moving into an ICP that doesn't have a current customer (i.e. a 'vacant' property).

[15] A trader switch is where a customer at an ICP changes retailer.

[16] Installation Control Point.

cannot currently determine how many individual consumers were declined electricity supply altogether, how many were declined by multiple retailers, and how many ultimately obtained supply through another pathway.

4.31 The Authority is also interested in understanding whether constrained access may lead to unintended consequences. For example, retailers have told us they are aware of some cases where customers have signed up using another person's name, either through a family member or through identity misuse, after being unable to access supply in their own name.

Q5. Do you agree that consumer credit history or retailer credit-risk assessments may be limiting some consumers' access to electricity services or retail plans? Please explain why or why not.

Q6. What factors influence whether a retailer accepts, declines or offers alternative arrangements to a consumer following a credit-risk assessment?

Q7. Are there any existing practices, safeguards or support arrangements that are working well to help consumers with adverse or limited credit history access electricity supply?

Q8. Are you aware of any unintended behaviours or consequences that may arise when consumers cannot access electricity supply in their own name? To what extent does this occur?

Legacy and non-communicating smart meters can limit access and choice

4.32 For some consumers, access to retail electricity and choice of retailer or pricing plan may be constrained by their meter type and its communication capabilities.

4.33 Communicating smart meters transmit usage data, typically in half-hour intervals sent daily. This enables accurate billing based on actual consumption and removes the need for manual meter reading. Communicating smart meters can also support remote connection and disconnection of supply, meter re-configurations, and more innovative offerings that depend on timely consumption data.

4.34 Some smart meters are unable to communicate or only communicate intermittently. This may be due to poor coverage by the cellular network (or cellular black spots), physical barriers (e.g. buildings) or because the meter's communications module has been removed.[17] Data provided to the Authority by MEPs shows only a small percentage of smart meters do not communicate regularly.[18]

4.35 Some retail plans depend on communicating smart meters. This includes prepay, time-varying plans and other offerings that may rely on accurate and timely consumption data.[19,20] Some retailers may also require a communicating smart meter before accepting a customer given their available pricing plans, and the cost and complexity to serve a customer with a legacy or non-communicating meter.

[17] We understand that some customers request the removal of their smart meter's communication module due to concerns about privacy and radiation from electromagnetic fields.

[18] Refer to Table 2.

[19] Consumers with some legacy meters that have separate day/night registers may be able to access plans with time-varying day/night rates.

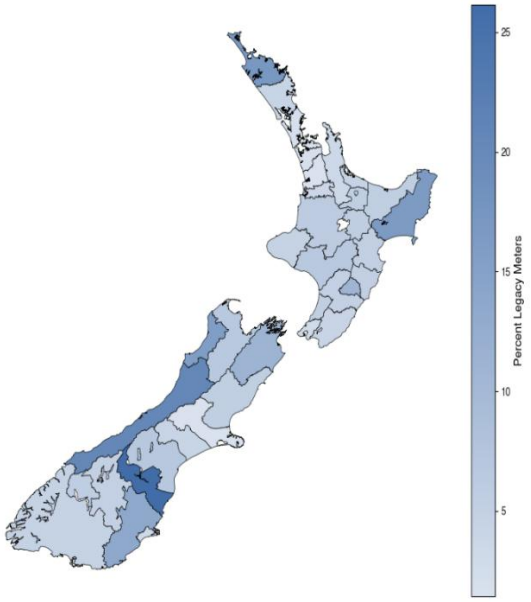
[20] Some consumers with legacy or non-communicating meters may be able to pre-purchase power packs.

Smart meter penetration is high nationally but varies across regions

4.36 Residential smart meter penetration in New Zealand is high, currently around 96 percent. Latest figures indicate that the number of remaining legacy meters at residential ICPs is 86,000.[21]

4.37 While smart meter coverage is high overall, distribution across New Zealand is uneven. For example, Waitaki and the West Coast network areas have less than 80% smart meter penetration.

Figure 1: Percentage of legacy meters at residential ICPs by network reporting area



Areas with the highest percentage of legacy meters are:

- Waitaki (26%),
- West Coast (20%),
- Northland (17%)
- Gisborne (16%)

Source: Electricity Authority

4.38 Combining the percentage of legacy meters with the percentage of non-communicating smart meters (Table 2) provides an indicative estimate of the proportion of ICPs that may not be able to support services that depend on communicating smart metering.

Table 2 - Estimated % households with legacy and non-communicating smart meters in areas with the highest prevelance

Region	% with legacy meters[22]	% with smart meters not communicating[23]	Estimated % of legacy and non-communicating meters
Waitaki	26	2	28
West Coast	20	2	22
Northland	17	1	18
Gisborne	16	6	22

4.39 These figures are indicative and should be interpreted with care. They do not show how many consumers have been declined service because of meter limitations, nor how many consumers would choose different products if a communicating smart meter were available. However, they indicate that in some regions a material share of consumers may face reduced access to retail products and services that depend on communicating smart meters.

[21] Electricity Authority Registry data.

[22] Electricity Authority registry data.

[23] Data made available to Electricity Authority by metering equipment providers.

Q9. Do you agree that legacy and non-communicating smart meters may be limiting some consumers' access to electricity services, retail plans or retail competition? Please explain why or why not.

Meter upgrades may not be straightforward for some consumers

4.40 There are currently no requirements for retailers or MEPs to replace remaining legacy meters with communicating smart meters.[24] However, there are commercial drivers for retailers and MEPs to replace legacy meters, including operational efficiencies, reduced manual meter reading costs, and the ability to support products that require half-hour data.

4.41 Despite these incentives, meter upgrades may not be straightforward. Some upgrades, as listed below, may be affected by site-specific technical issues, expensive wiring or installation requirements, or consumer decisions not to proceed with an upgrade. In some cases, the cost or complexity of resolving these issues may be material relative to the benefits of installing a communicating smart meter.

Meter upgrades in practice

4.42 In general, where a consumer requests a retail plan that requires a different meter, the retailer may commission the MEP to change or upgrade the meter at the premise. Associated costs may be passed on to the customer, although the Authority understands some retailers provide meter replacements and upgrades at no cost to the customer.

4.43 This pathway is more likely to be available to consumers who already have access to a retailer willing to serve them. Consumers who are unable to secure supply may face a circular barrier. Without a retailer, they may be unable to arrange a new meter; yet without a communicating smart meter, they may be unable to access some retail products or alternative pathways including prepay.

Other barriers preventing meter upgrades

4.44 Even where a meter upgrade is available, several other barriers may prevent or delay smart meter installation, including:

(a) Consumer-related issues, including where a consumer does not want a smart meter installed

(b) tenancy or property constraints, including where landlord or third-party consent is needed

(c) access issues, including inability to access the premises or health and safety barriers

(d) physical or building-related issues such as unsafe wiring, asbestos, proximity to a gas meter, insufficient space or other remedial work needed before installation

(e) telecommunications coverage or signal issues that may affect whether a smart meter can communicate reliably

(f) cost-related barriers which could include the expense of remedial work required, property upgrades, or other installation-related costs.

4.45 These barriers raise questions about whether existing arrangements are sufficient for the remaining harder-to-upgrade premises, particularly where metering constraints may also limit access to electricity supply or meaningful retail choice.

[24] The Authority's recent introduction of requirements for retailers to offer time-of-use pricing may incentivise the replacement of some legacy meters.

4.46 They also raise questions about how awareness, responsibilities and costs are allocated between consumers, retailers, metering equipment providers, landlords and other parties when an upgrade is needed but not straightforward.

Q10. What are the most prevalent barriers to upgrading legacy meters or restoring communication capability to non-communicating smart meters?

Q11. What typically happens when a consumer needs a communicating smart meter to access a particular retail product or service, but an upgrade is delayed, declined, not technically straightforward, or cannot be arranged because the consumer does not have a retailer willing to serve them?

Q12. How are the costs of meter upgrades, remedial work or communication issues currently managed, and are there circumstances where these costs may prevent consumers from accessing electricity services or retail choice?

Q13. Are existing arrangements sufficient to address the remaining harder-to-upgrade premises, or are there opportunities to improve coordination between retailers, metering equipment providers, distributors, landlords and consumers?

Constrained access can affect health, wellbeing and participation

4.47 The effects of constrained electricity access or an inability to maintain supply can extend beyond the electricity account. Electricity supports essential household services, such as space and water heating, refrigeration, cooking, and the operation of medical equipment.

4.48 Where households cannot obtain or sustain the electricity services they need, the effects may be experienced across several areas of their lives. According to the 2023 New Zealand Census, 1.8% of households in occupied private dwellings did not have access to electricity supply. This rose to 3.6% for those which were not owner-occupied.[25]

4.49 Evidence on energy hardship and housing conditions illustrates the potential consequences where households cannot obtain and afford adequate energy services. Although this evidence does not directly measure the effects of being declined by a retailer, it provides important context for understanding what may occur where access constraints lead to inadequate or interrupted electricity services.

Household may reduce essential electricity use

4.50 Consumers experiencing difficulty maintaining supply may respond by using less electricity than they need. This may include limiting space heating, delaying cooking or washing, reducing hot-water use, or spending more time in one heated room. Consumers may also prioritise electricity over other essential expenditure.

4.51 These responses can make hardship less visible. A household may remain connected and continue paying its electricity bill, but only by living in a cold home, reducing other essential consumption or relying on support from whānau, friends or community organisations.

4.52 MBIE defines energy hardship as occurring where individuals, households and whānau are unable to obtain and afford adequate energy services to support their wellbeing.

4.53 MBIE's latest monitoring indicates that energy hardship affects a substantial number of New Zealand households. Depending on the measure used, between approximately 74,000 and 132,000 households experienced specific indicators of energy hardship in the year ended June 2024. Renters and low-income households were more likely to experience these

[25] Housing in Aotearoa New Zealand: 2025 | Stats NZ

indicators. Crowded households were also substantially more likely to be unable to afford to keep their accommodation adequately warm.[26]

Inadequate electricity services may compound poor housing conditions

4.54 The impact of reduced heating can be more significant where homes are difficult or expensive to keep warm and dry. The 2023 Census found that 18.1 percent of occupied private dwellings — approximately 288,000 homes — were always or sometimes damp. Electricity was the main form of heating in 84.2 percent of occupied private dwellings.[27]

4.55 Electricity access does not, by itself, resolve poor housing quality. However, a household's ability to heat, ventilate and dehumidify its home can affect whether existing housing problems are manageable. Consumers living in damp, poorly insulated or inefficient homes may need more electricity to achieve the same level of warmth as consumers living in more energy efficient homes. This can increase the consequences of constrained access, unaffordable supply or periods without electricity.

4.56 The Ministry of Health links cold, damp, mouldy and crowded housing to higher rates of respiratory and infectious illness, cardiovascular conditions and poor mental health. These risks may be particularly acute for infants and children, older people, disabled people, and people with existing health conditions or higher electricity needs.[28]

Some consumers may face more serious consequences

4.57 For households with children, inadequate heating, lighting, hot water or refrigeration may affect health, sleep, study and everyday family routines. Previous New Zealand research into prepay electricity found that households using prepayment meters were commonly low income, Māori and Pacific households were over-represented, and more than half included children. Of the consumers surveyed, 52 percent reported at least one self-disconnection in the previous year; some experienced repeated or extended periods without electricity.[29]

4.58 The consequences can be particularly serious for medically dependent consumers and others who rely on electricity for medical reasons. This includes the use of medical equipment, treatment, mobility, temperature control or the safe storage of medicines. Even a relatively short interruption may create significant health or safety risks for these consumers.

4.59 Disabled people may also face higher energy needs while being more exposed to living in poor-quality housing and experiencing material hardship. Recent research reports that 29 percent of disabled people said their home was colder than they would like in winter and 25 percent reported damp living conditions.[30] Separate research found that people with intellectual disability were twice as likely to put up with being cold because they could not afford heating.[31]

Electricity hardship can create wider financial and social pressures

4.60 Some households may manage electricity costs by reducing spending on food, transport, healthcare or other essentials, borrowing money, using emergency assistance or allowing

[26] Ministry of Business, Innovation and Employment, https://www.mbie.govt.nz/dmsdocument/31651-report-on-energy-hardship-measures-year-ended-june-2024, 2025

[27] Home ownership increases and housing quality improves | Stats NZ, 2023

[28] Health and Independence Report 2024 – Te Pūrongo mō te Hauora me te Tū Motuhake 2024

[29] Power and Control: A multiphase mixed methods investigation of prepayment metering and fuel poverty in New Zealand. - University of Otago, 2013

[30] IHC | Disability survey data highlights inequities that could last generations, 2025

[31] IHC Report: The Cost of Exclusion, 2025

other debts to accumulate. These trade-offs can reinforce existing financial hardship and make it more difficult for consumers to establish or maintain a positive credit history.

4.61 A consumer who cannot obtain an account in their own name may need to rely on a family member, friend, advocate or social service to secure supply. This may reduce the consumer's independence, create unclear responsibility for payment and debt, or expose both parties to financial and relationship risks. In more serious cases, households may delay moving into suitable accommodation, remain in unsafe or insecure housing, or occupy a property without a clear and sustainable electricity arrangement.

4.62 Loss of electricity may also restrict participation in education, employment and increasingly digital public and commercial services. This is particularly relevant where people work or study from home, need to charge communications or mobility devices, or rely on internet access to engage with government agencies, health providers and support services.

Impacts are likely to be unevenly distributed

4.63 The available New Zealand evidence indicates that energy and housing hardship are not evenly distributed. Renters are more likely than owner-occupiers to experience energy hardship and problems keeping their homes warm. Māori and Pacific peoples are also disproportionately exposed to damp, mould, crowding and other housing pressures.[32]

4.64 These patterns do not establish that particular population groups are more likely to be refused electricity supply. They do, however, suggest that access or choice constraints may have more severe effects where they overlap with low income, insecure housing, poor-quality housing, disability, health needs, limited digital access or other forms of disadvantage.

4.65 The Authority therefore wants to understand not only how many consumers face barriers to electricity access and choice, but what happens after those barriers arise. This includes whether consumers eventually obtain sustainable supply, how long this takes, what arrangements are relied on in the meantime, and the effects on health, finances, housing stability, independence and participation in everyday life.

Q14. Do you have any further information or evidence on the number and characteristics of consumers affected by access and choice constraints, the circumstances in which these constraints arise, and what happens after a consumer is declined or cannot access a suitable retail service?

[32] Pacific housing: People, place, and wellbeing in Aotearoa New Zealand | Stats NZ, 2023

5 Current alternative access pathways are narrow and may not be suitable for all consumers

5.1 Consumers who cannot access standard post-pay electricity supply generally have three alternative pathways: prepay, social retailing, or exceptional onboarding by a traditional retailer.

5.2 These pathways play an important role. They can help some consumers access electricity supply where they may otherwise be declined because of credit history, payment risk, or other circumstances.

5.3 However, the preliminary evidence suggests these pathways are narrow and unevenly available. For some consumers, particularly those with both credit-related barriers and metering constraints, there may be very limited practical access to electricity supply.

5.4 These pathways also have different limitations. Prepay can support budgeting and avoid accumulation of further debt but may expose some consumers to repeated or extended disconnection. Social retailing provides tailored support, but is limited in scale, geographic reach, funding, hedging and operational capacity. Exceptional onboarding can help individual consumers, but is generally discretionary, inconsistent and difficult for consumers and advocates to navigate.

5.5 The Authority is seeking evidence on whether these pathways are sufficient, suitable, and sustainable, and what happens to consumers who cannot access them.

Alternative pathways are limited and often depend on metering capability

5.6 Consumers who are unable to access standard post-pay electricity services may have a limited number of alternative pathways to secure electricity supply. These alternatives generally include:

(a) **Prepay** — where consumers pay for electricity before using it

(b) **Social retailing** — where retail models are designed to support social outcomes alongside tailored support services.

(c) **Exceptional onboarding** — where some retailers may offer post-pay supply subject to additional conditions or support arrangements.

5.7 The practical availability of these pathways varies by retailer, network area, metering capability and the consumer's individual circumstances. Notably, several pathways appear to depend on the consumer having a communicating smart meter.

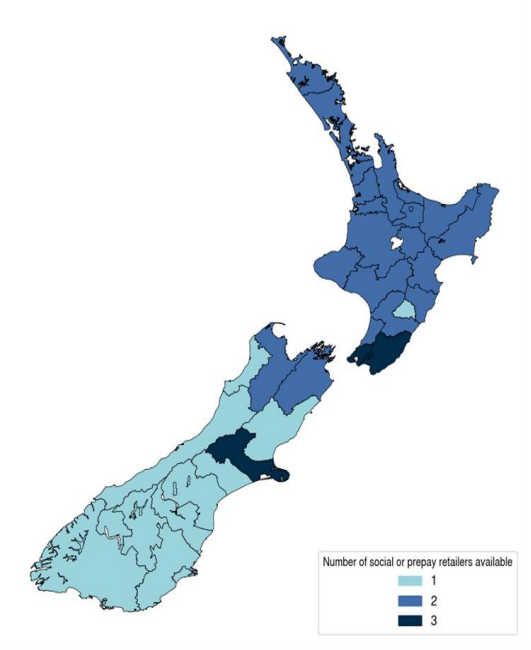
5.8 The Authority is aware of three retailers with more than 1,000 ICPs that are currently widely accepting customers with poor credit history:[33] Toast Electric, Nau Mai Rā and Contact Prepay.[34]

5.9 Figure 2 shows where in New Zealand these retailers currently operate and where this segment of consumers may have one, two or three options. These options generally require a communicating smart meter. Retailers accepting customers with poor credit via exceptional onboarding routes are not included.

[33] 'Standard credit criteria' used may vary between retailers.

[34] Prepay providers Globug (14,821 ICPs in February 2026) and Wise (5,852 ICPs in February 2026) are not currently accepting new customers.

Figure 2 number of retailers currently widely accepting customers with poor credit



Based on the information available to the Authority, this indicates that:

- In 37% percent of all network areas — which account for almost 328,000 residential ICPs — Contact Energy (Prepay) is the only retailer widely accepting consumers who may not meet standard credit criteria.
- In 55% of all network areas (covering 1.5 million residential ICPs), two retailers appear to be available to consumers who may not meet standard credit criteria.
- In only 7% of all networks (covering 444,000 residential ICPs), three retailers appear to be available to consumers who may not meet standard credit criteria.

Source: Electricity Authority

5.10 The constraint is most acute where barriers overlap. A consumer with adverse credit history and a legacy or non-communicating meter may be unable to access standard post-pay supply, prepay or some social retailing models. In those circumstances, access may depend on whether a retailer is willing to offer an exceptional onboarding arrangement.

5.11 Consumer advocates and non-governmental social support agencies have told the Authority that they are receiving calls from consumers who have been unable to find a retailer willing to supply them.[35]

5.12 The Authority is interested in understanding what happens to consumers in these circumstances. This includes whether they eventually obtain supply through another retailer, use prepay, access support through an advocate, enter into an arrangement using another person's account or remain without electricity supply.

Q15. Are the three main alternative pathways — prepay, social retailing and exceptional onboarding — sufficient, suitable and sustainable?

Q16. Are there consumer groups, regions, network areas or metering circumstances where consumers currently face limited or no practical pathway to access retail electricity supply? If so, which consumers are most affected and what do they do?

Prepay is an important but increasingly concentrated pathway

5.13 Prepay electricity allows consumers to pay for electricity before using it. Because electricity is paid for in advance, prepay services do not require a credit-risk assessment as standard post-pay electricity services do. All current prepay services require a communicating smart meter.

[35] For example, MoneyTalks advises the Authority that they frequently receive calls from consumers seeking assistance after being unable to find a retailer to supply them with electricity.

5.14 Prepay currently accounts for a relatively small share of the residential retail market. As of February 2026, there were approximately 29,000 residential prepay ICPs, representing around 1.4 percent of residential connections.

5.15 There are currently three prepay retailers operating in New Zealand, these are:

(a) Globug, owned by Mercury Energy

(b) Contact PrePay, owned by Contact Energy

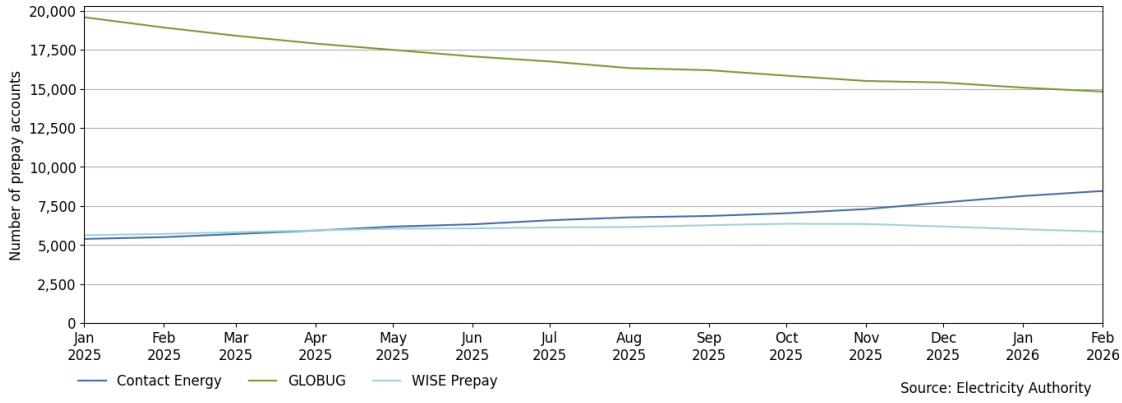
(c) WISE Prepay, owned by Nova Energy.

5.16 However, the availability of prepay services for new customers has changed in recent years and Contact Energy is currently the only retailer accepting new prepay customers. Globug stopped accepting new customers in late 2024 while the service was under review and WISE Prepay stopped widely accepting new customers in December 2025.

5.17 While existing prepay retailers may resume accepting new customers or new prepay offerings may emerge in the market, at present, Contact Prepay appears to be the only practical prepay pathway for new customers who cannot access standard post-pay electricity services.

5.18 Figure 3 shows that the prepay market share has also changed over time. Contact Prepay's customer base increased from approximately 5,400 customers in January 2025 to approximately 8,500 customers in early 2026, while Globug's customer base declined and WISE Prepay remained broadly stable.

Figure 3 Number of prepay ICPs by retailer



5.19 The Authority understands that prepay can be more operationally intensive for retailers than standard post-pay retailing. Prepay customers may require more frequent communication and support, including balance reminders, top-up assistance and disconnection and reconnection processes. These features can increase the cost to serve these customers.

5.20 These commercial and operational factors may affect the willingness of retailers to offer prepay services. They may also affect the level of investment in service quality, product development, digital tools, pricing options, and customer support.

5.21 The Authority is interested in understanding whether prepay is operating as a competitive retail product, or whether it is functioning primarily as a minimum-access pathway for consumers who may otherwise have limited options. Where there is little effective competition for prepay customers, retailers may have less incentive to compete on price, service quality, innovation, or consumer experience.

Pricing outcomes for prepay consumers appear varied

5.22 Early analysis of retail market monitoring data does not indicate a systematic or material difference between prepay and comparable post-pay plans. Prepay can involve higher operating costs for retailers, including balance notifications, top-up support, disconnection and reconnection processes, debt-management arrangements and more frequent customer contact. The available data suggests these costs are not generally being passed through to prepay customers in a way that results in materially higher tariffs than comparable post-pay customers.

5.23 Fee data also suggests that direct charges to prepay customers are relatively limited. Retail market monitoring data shows that in 2025 no prepay customers were charged disconnection fees. Reconnection fees were charged 1,462 times, despite there being more than 300,000 prepay disconnections in the same period. Around 90 percent of reconnection fees were $20 or less. A small number of reconnection fees were between $150 and $320, including GST, and are likely to relate to manual reconnections where remote reconnection was not appropriate.

5.24 Other fees charged by prepay retailers vary by provider and service type. Some retailers report no additional fees, while one retailer reports other fees on a material share of bills. These may include payment-related fees, recharge card fees, emergency credit loan fees, disconnection hold fees, or credit refund request fees. For prepay customers who were charged other fees in 2025, the mean value was $8 per month and the median value was $4.30 per month.

5.25 However, the Authority's concern is broader than current tariff and fee levels. Prepay customers require communicating smart meters, but appear to have less, if any, access to pricing innovation and potential savings opportunities available to post-pay customers, including time-varying pricing, free-hour offers, demand response products, hot water control options and other emerging services. This may limit their ability to reduce costs or benefit from the future direction of the retail electricity market.

5.26 The Authority is therefore interested in whether limited competition and product choice in the prepay segment is affecting service quality, innovation, and access to future savings opportunities, even where current tariff and fee outcomes do not appear materially different to post-pay.

Q17. Do prepay customers have sufficient access to pricing innovation and savings opportunities, including time-varying pricing, demand flexibility, free-hour offers or other emerging retail products? If not, what are the main barriers to making these options available to prepay customers?

5.27 The Authority is interested in understanding whether commercial, operational, technological, or regulatory factors are affecting the availability, sustainability, quality, and competitiveness of prepay services.

Q18. What role is prepay currently playing for consumers who cannot access standard post-pay electricity services, and what benefits does it provide for those consumers?

Q19. Is there effective choice and competition in the prepay market, and what are the main operational, commercial, technological or regulatory barriers to offering prepay services?

Prepay disconnections are a feature of prepay, but consumer impacts may vary

5.28 Prepay electricity allows consumers to pay in advance and manage electricity use within a chosen budget. For some consumers, this can provide greater visibility and control over spending, reduce the risk of accumulating debt, and provide flexibility to pause or limit electricity use.

5.29 Disconnection when credit is exhausted is a feature of prepay electricity. This means prepay disconnection data needs to be interpreted differently from post-pay disconnection data. A prepay disconnection may reflect a consumer choosing not to top up immediately, a short delay in topping up, a budgeting decision, a temporary absence from the premises, or circumstances where the consumer is unable to top up.

5.30 Retail market monitoring data indicates that prepay disconnections are frequent. In 2025, there were around 317,000 prepay disconnections, compared with around 9,600 for post-pay. Each month around one in three prepay customers is disconnected, although most disconnections are short and followed by reconnection within the same day.

5.31 Some prepay customers experienced repeated disconnection. Approximately 69 percent of prepay customers who were disconnected were disconnected more than once in 2025, and approximately 42 percent were disconnected more than five times. These figures may reflect the normal operation of prepay for some consumers, including active budget management. However, they may also indicate affordability pressure or difficulty maintaining supply for some households.

5.32 A smaller proportion of recorded prepay disconnections lasted more than one day. In 2025, around 6 percent of disconnections (18,555), where duration information was available, lasted more than one day. Longer disconnection periods may have a range of explanations, varying from consumer choice and absence from the premises to inability to top up, delays in payment processing, or due to safety requirements before reconnection can occur.

5.33 The Authority is seeking better insights on the duration, frequency, causes, and consumer impacts of prepay disconnections. This includes understanding when disconnections reflect an intended feature of the plan that supports consumer budgeting and control, and when they may indicate that consumers are experiencing difficulty maintaining electricity supply.

Q20. To what extent do prepay disconnections reflect consumer choice, budgeting preferences or temporary pauses in use, compared with circumstances where consumers are unable to top up?

Q21. What information are retailers capturing that could help identify when repeated or longer prepay disconnections may indicate affordability pressure, difficulty maintaining supply, or other consumer impacts?

Prepay is not suitable for medically dependent consumers

5.34 Post-pay plans are safer for medically dependent consumers because even temporary loss of electricity supply can create serious health and safety risks to consumers who rely on electricity for medical equipment or treatment.

5.35 The Consumer Care Obligations recognise this risk.[36] Retailers must not recommend prepay to households where a medically dependent consumer may live and if the retailer is aware that a medically dependent consumer temporarily or permanently lives at the premise.

[36] Electricity Authority, *Consumer Care Obligations*, cl. 59.

Retailers must use best endeavours to encourage these customers to use a post-pay plan, engage with support agencies and consult with a health practitioner.

5.36 Retail market monitoring data indicates a small number of medically dependent consumers are using prepay and have experienced disconnections. In December 2025, 343 medically dependent consumers were using prepay. Across 2025, medically dependent consumers experienced 277 incidents of prepay disconnection, with some disconnected repeatedly and some for more than one day.

5.37 The Authority has since raised this with retailers, who have now taken steps to address this risk. Since May 2026, no further medically dependent consumers have been disconnected from prepay services; the Authority will continue to monitor this closely.

5.38 This still raises serious questions about whether current consumer protections are sufficient, and whether additional safeguards are needed to ensure medically dependent consumers are not exposed to avoidable disconnection risk.

Q22. Are additional pathways, safeguards or protections needed to reduce the risk that medically dependent consumers are placed on, or remain on, prepay arrangements?

Prepay customers may have less access to innovation and savings opportunities

5.39 Prepay customers appear to have access to a narrower range of pricing and demand-flexibility products than post-pay customers.

5.40 In particular, prepay plans do not currently have the same access to time-varying pricing, free-hour promotions or other products that reward post-pay consumers for shifting consumption away from peak periods.

5.41 This may limit the ability of prepay consumers to reduce their electricity costs through demand flexibility and participation in emerging retail offers.

5.42 For example, dynamic load control, such as managing hot water load, which accounts for around a third of household energy use, can deliver significant savings for post-pay consumers.[37] Prepay customers generally cannot access these types of plans, limiting their ability to manage use and costs.

5.43 Limited access to innovative products may partly reflect the technical and operational requirements of prepay. However, it may also reflect the limited level of competition in the prepay market. Where few retailers are actively competing for prepay customers, there may be weaker incentives to invest in new prepay products, improve digital tools, offer more flexible pricing, or design services around the needs of this customer group.

5.44 As a result, consumers who are limited to prepay may not be able to participate fully in the benefits of competition, innovation, and the evolving electricity market. This is particularly important where prepay is not simply a consumer preference, but the only access pathway realistically available.

Q23: Do prepay customers have reduced access to innovation, competition and emerging opportunities to reduce electricity costs? If so, what technical, commercial or regulatory barriers may be preventing retailers from offering more innovative prepay products?

[37] BRANZ, *"Water Heating,"* Level, last modified March 30, 2026.

Prepay may create additional risks where it is used to recover existing debt

5.45 Some prepay arrangements require a portion of each credit top-up to be used to repay existing electricity debt. For some customers, this may mean that 10 to 25 percent of each top-up is automatically allocated to debt repayment.

5.46 Debt recovery through prepay may help some consumers manage repayment over time while maintaining access to electricity. However, where prepay is a consumer's only viable access pathway, automatic debt deductions may increase the risk that the remaining credit is insufficient to maintain supply.

5.47 This may be particularly relevant for consumers experiencing energy hardship, where repeated small top-ups are used to manage immediate household needs.

5.48 The issue is not whether debt should be repaid, but whether repayment settings are reasonable, transparent, and designed in a way that does not increase avoidable disconnection risk.

5.49 The Authority is interested in understanding how debt-recovery settings are currently applied to prepay customers, how customers are informed about deductions, and whether current arrangements appropriately balance debt repayment with maintaining access to electricity.

Q24. Does the use of prepay arrangements to recover previously incurred debt create additional risks for some consumers, and how are debt-recovery settings calculated, managed and communicated to consumers?

Social retailing has developed as one response to energy hardship and constrained access

5.50 Social retailing refers to retail models that are designed to support social outcomes alongside electricity supply. These models may include lower-cost plans, different approaches to managing credit and payment risk, links to additional community services, and more intensive engagement to support consumers to stay connected.

5.51 In 2022, MBIE commissioned Concept Consulting to examine social retailing models as part of the Energy Hardship Expert Panel's work programme.[38] That work identified a spectrum of possible social retailing options, ranging from mandated minimum consumer care requirements on all retailers, to government-contracted or community-based social retailer models. Concept's analysis concluded that some options could improve outcomes for consumers in energy hardship, but that each option raised important design questions about funding, targeting, market impacts, competition, and the risk of crowding out existing innovation.

5.52 Since that work was completed, the landscape has changed. Some of the options identified in the Concept work have progressed in different forms. The most significant system-wide change has been the introduction of mandatory Consumer Care Obligations.

5.53 These obligations now require all retailers to meet minimum standards of care for domestic consumers, including obligations relating to payment difficulty, disconnection, protecting medically dependent consumers from disconnections, protections to consumers in prepay and support to help consumers stay connected.

[38] Ministry of Business, Innovation and Employment, *Social Retailing Phase 2: Development and Evaluation of Social Retail Options Requiring Further Analysis*.

5.54 This means social retailing now operates in a different regulatory context. The key question is whether there is a form of social retailing or a component that could have a distinct and additional role beyond the baseline protections that now apply to all retailers.

The current social retailing market remains small and unevenly available

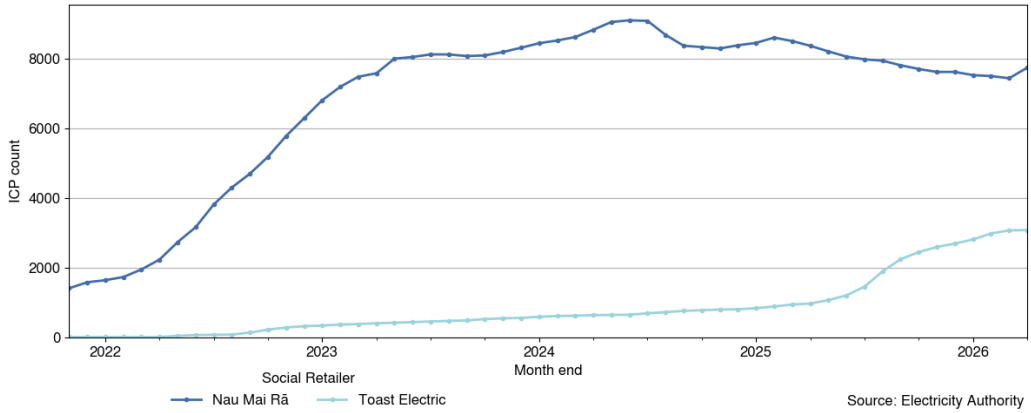
5.55 New Zealand currently has a small number of social retailing or community-oriented retail models. The two primary social retailers are Toast Electric and Nau Mai Rā. These providers have different ownership, funding and operating models but both aim to support consumers who may otherwise face barriers in the retail electricity market.

5.56 Social retailing is not currently offered nationwide. Toast Electric currently operates in parts of Christchurch and mid-Canterbury, Kāpiti and Horowhenua, Wairarapa and Wellington. Nau Mai Rā recently recommenced accepting new customers and is seeking to expand its presence across more network areas.

5.57 There are also other community or membership-focused social retailers such as Grey Power (Pulse) and Good Power (Salvation Army), which are offered in some areas.

5.58 Figure 4 shows the number of ICPs supplied by Toast Electric and Nau Mai Rā over time and the significant expansion since 2022.

Figure 4: Number of ICPs using Nau Mai Rā (For Our Good) and Toast (Sustainability Trust)



Social retailing faces practical constraints to expansion

5.59 Social retailers can play an important role for some consumers, particularly where they combine electricity supply with trusted relationships, budgeting support, community connections, or a more flexible approach to credit and payment risk. However, social retailing also faces practical constraints that may limit its ability to scale without further support.

5.60 Social retailers have told the Authority that accepting consumers with legacy or non-communicating meters can be difficult and may occur only in limited circumstances. This suggests that some consumers may face barriers to accessing social retailing because of their metering capability. This is because these meters can increase servicing costs, create operational complexity, limit the ability to offer certain pricing or payment models and make it more difficult to provide timely support to consumers.

5.61 Social retailers may have other barriers that affect their ability to enter, expand or operate sustainably. These include access to favourable wholesale hedges, prudential requirements, working capital, billing and customer management systems, referral pathways, operational capability, network arrangements, and sustainable funding.

5.62 These constraints suggest that expanding social retailing is not simply a matter of consumer demand. It may also depend on whether the market and regulatory settings provide a viable pathway for social retailers, community providers, or other retailers offering social retailing services to enter, expand and innovate.

Collective action has helped create new pathways, but questions remain about sufficiency and scale

5.63 Recent developments indicate that the social retailing landscape is evolving. The emergence of the "Pool of Power" represents a significant practical development.[39] This five-year supply agreement involves a partnership between For Our Good and Meridian, Genesis, Mercury, and Contact. Through this arrangement, generation retailers provide access to hedges on supportive terms enabling For Our Good to on sell electricity to social retailers such as Nau Mai Rā.

5.64 This type of arrangement responds directly to one of the barriers identified in earlier social retailing work: the difficulty small or socially focused retailers can face in accessing wholesale supply on terms that support a sustainable social retailing model.

Costs of entry for social retailing may be too high

5.65 The Authority has also recently consulted on changes to prudential security arrangements.[40] This consultation includes proposals intended to reduce barriers for smaller traders. While these changes may not resolve all prudential challenges faced by social retailers, they form part of the broader question of whether market settings are appropriately calibrated for smaller, innovative, or socially focused participants.

5.66 Together these developments suggest that the social retailing landscape is evolving. However, they do not answer the core policy questions: whether current social retailing services are sufficient, whether they can scale to meet national need, and what role social retailing should play alongside mainstream retail obligations, prepay, social agency support, and potential future access pathways.

The future of social retailing needs to be tested

5.67 The Authority is interested in better understanding the barriers to scaling social retailing, including whether access to wholesale hedges (including at more preferential terms than may be available to other retailers), prudential requirements, network arrangements, metering constraints, funding, or referral pathways affect the ability of social retailers to grow.[41]

5.68 The Authority is interested in stakeholders' views on the appropriate future role of social retailing in New Zealand's electricity market.

5.69 One possible view is that social retailing should remain a targeted, community-led and industry-supported response for consumers with more complex needs, sitting alongside mandatory minimum protections that apply to all retailers. Another view is that social retailing should become a more substantial national access pathway for consumers who face barriers to post-pay electricity, poor credit history, or affordability stress. A further possibility is that social retailing could evolve into a more diverse set of models, including iwi-led, community-led, regional, not-for-profit, membership-based, or retailer-supported services.

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[39] Te Ao News, *"Māori Power Retailer Secures Major Deal to Keep Whānau Lights On,"* April 11, 2026.

[40] Electricity Authority, *Improving Prudential Security Arrangements: Issues and Options*. https://www.ea.govt.nz/projects/all/improving-consumer-choice/consultation/improving-prudential-security-arrangements/

[41] The Authority consulted on proposed changes to prudential security arrangements in April 2026, highlighting the challenges faced by smaller companies. A key proposal would reduce prudential requirements for traders with less than 1,000 ICPs.

5.70 Each pathway raises important design questions. Expanding social retailing could improve access, trust, engagement and tailored support for some consumers. It could also create more diversity and innovation in the way electricity services are delivered.

5.71 However, poorly designed interventions could create unintended consequences, including crowding out existing social retailers, reducing incentives for mainstream retailers to improve their own support practices, creating a two-tier retail market, or shifting costs to other consumers.

5.72 The Authority's preliminary view is that social retailing should not be considered in isolation. It should be assessed as part of the broader system of consumer access, care and choice. This includes the Consumer Care Obligations, metering capability, prepay settings, credit and onboarding practices, wholesale and prudential arrangements, community support services, and the role of government agencies.

5.73 The Authority is particularly interested in whether social retailing should continue to develop through voluntary and industry-supported arrangements, whether more formal support or coordination is needed, and how any future approach could support scale without undermining competition, innovation, or the responsibilities of mainstream retailers.

Q25. Should social retailing remain a targeted community-based, industry-led response, or should it become a more substantial national access pathway for consumers who face barriers to standard post-pay electricity?

Q26. What are the main barriers to scaling social retailing, including access to hedges, prudential requirements, metering capability, funding, referral pathways and operational capability?

Q27. What forms of support, if any, would be most effective in expanding social retailing without crowding out existing providers or reducing incentives for mainstream retailers to support consumers in hardship?

Some retailers may offer exceptional onboarding arrangements, but these can be difficult to navigate

5.74 Some consumers who do not meet standard credit criteria may still be able to access post-pay electricity services through alternative or exceptional onboarding arrangements. These arrangements vary across retailers and may not be clearly advertised to consumers.

5.75 Exceptional onboarding may include:

(a) **Benefit redirections** – consumers receiving government benefits may be able to arrange for payments to be redirected to their electricity retailer before the remaining benefit is paid to them. This may reduce retailer credit risk and help some consumers access supply. However, this approach may not be suitable or available for all consumers, and there are limits on the amount of benefit that can be redirected.

(b) **Advocacy for credit exceptions** – retailers and support agencies have told the Authority that credit exceptions often rely on third party advocacy or referrals. Support agencies are often needed to advocate to retailers on behalf of their clients to try and secure electricity access. The Authority does not currently gather data on the number of consumers with poor credit who are being given contracts via referral processes.

(c) **Bonds** – some retailers may require a bond or deposit before providing service to a customer with poor credit. Recent retail market monitoring data shows that 4 out of 28 energy retailers (across 39 retail brands) charged bonds in 2025. The average bond charged was $155, but amounts vary significantly amongst retailers.

(d) **Guarantors or joint account holders** – some retailers may accept credit-risk or no-credit customers if they have someone who agrees to act as their guarantor or be a joint account holder. This may limit credit risks for retailers.

(e) **Supported onboarding pilot programmes** – some initiatives have tested whether consumers with poor credit history can access and maintain post-pay electricity services where support is provided from the outset. For example, the ConnectMe Pilot showed that consumers with lower credit scores could remain connected and pay their electricity bills if they remained in contact with their retailer, Work and Income redirections were in place, and there was wraparound support service available from the outset.[42]

(f) **Transition from prepay to post-pay** – some retailers may support existing prepay customers to move to post-pay arrangements where this is suitable for the consumer and manageable for the retailer. The Authority is interested in understanding how often this occurs and whether it provides a practical access pathway for some consumers.

Q28. Are there any other examples of exceptional onboarding for consumers with adverse or limited credit history onto standard post-pay plans, beyond the approaches outlined in this paper?

Q29. How do consumers find out about what onboarding opportunities are available to access standard post-pay plans?

Q30. How are benefit redirections being used to support access to electricity supply, and are consumers being declined supply if they are unable or unwilling to redirect their benefit?

Q31. How many consumers with adverse or limited credit history are being offered contracts by retailers after third-party advocacy or referrals, and what are the benefits, risks and limitations of this approach?

[42] ConnectMe was a 12-month pilot led by ERGANZ in 2023, involving five retailers, that provided 355 consumers with access to post-pay electricity regardless of credit history or benefit status. The initiative included access to post-pay plans, flexible payment arrangements, WINZ redirection support, referrals to budgeting services, and one-off financial assistance where needed. The key premise of the pilot was that there was a third-party guarantor to underwrite the credit risk and function as a back-up for bill payments should the customer run into arrears.

6 Proposed outcomes sought and potential areas for improvement

6.1 Preliminary evidence in this paper suggests that some consumers may face barriers to accessing electricity supply or exercising meaningful choice between retailers and plans. These issues, credit-related barriers and metering constraints, can affect consumers directly, but they also matter for competition, innovation, affordability, and the future performance of the electricity system.

6.2 The Authority is not proposing preferred solutions at this stage. The purpose of this consultation is to test whether stakeholders agree with the issues identified, what outcomes the electricity system should aim to deliver and whether further work would have the greatest impact.

6.3 We are also interested in whether there are practical steps that could be taken in the shorter term, while more complex issues are considered. This includes any quick wins, non-regulatory actions, data improvements, operational changes, or partnerships that could improve consumer outcomes without waiting for a full regulatory reform process.

Proposed outcomes

6.4 The Authority considers that the electricity market should aim to deliver the following outcomes:

(a) all consumers have reasonable pathways to secure electricity supply

(b) consumers can participate meaningfully in retail competition and emerging electricity services

(c) consumers with adverse credit history or metering constraints are not disproportionately excluded from innovation, flexibility, or cost-saving opportunities

(d) retailers remain able to manage legitimate commercial risks in a proportionate and sustainable way

(e) market settings support both consumer choice, long-term competition, innovation and efficient investment

(f) alternative access pathways such as prepay, social retailing and exceptional onboarding are available, suitable, transparent and sustainable over time.

6.5 The Authority is particularly interested in understanding whether stakeholders agree with these broad consumer outcomes and where priorities for improvement should sit.

Q32. Do you agree with the proposed outcomes, and are there additional consumer outcomes the Authority should consider?

Potential areas for improvement

6.6 Some countries with competitive electricity markets use additional safeguards to ensure consumers can access electricity even when they cannot obtain an offer through normal retail channels. Such mechanisms can include assigning each property a default retailer that must offer supply.

6.7 Australia provides one example. In the states and territories that have adopted the National Energy Customer Framework[43] all small consumers have assigned a default local electricity provider which must provide them with a default market offer contract.[44] Consumers are free to choose a different electricity retailer if they find another one who is willing to supply them. A similar scheme operates in Victoria based on a range of technical and contractual frameworks.

6.8 We acknowledge that not all international examples may be suitable for the New Zealand context. Any potential solutions must be carefully designed for our electricity system and consumer needs.

6.9 We are interested in hearing views on mechanisms used internationally which could potentially inform New Zealand's approach to improving access and choice.

6.10 Based on the preliminary evidence presented in this paper, the Authority's initial view is that improvements may be needed across six broad areas:

(a) improving visibility of barriers to access and choice

(b) strengthening mainstream pathways into post-pay electricity supply

(c) improving outcomes for consumers using prepay electricity

(d) supporting social retailing and community-based retail models

(e) improving access to suitable metering

(f) strengthening broader system and cross-agency responses.

6.11 These areas are interconnected. Progress in one area may improve outcomes in another. For example, improving metering access may improve access to prepay and innovative pricing products. Similarly, improved hardship support, referral pathways and more targeted payment assistance programmes, may help more consumers access post-pay electricity supply and stay connected over time.

6.12 The Authority is interested in stakeholder views on which areas are likely to have the greatest impact on long-term consumer outcomes and where effort should be prioritised.

Q33. What international examples of approaches to ensuring electricity access for all consumers do you believe would be appropriate for the New Zealand context and why?

Q34. Do you agree with the proposed areas for improvement, and are there additional areas the Authority should consider?

Q35. Which areas should be prioritised for further work, and why?

Q36. What practical steps, including any quick wins, could improve access and choice in the short term?

[43] The National Energy Customer Framework regulates the connection, supply and sale of electricity in Australia. The NECF has been adopted in the ACT, Tasmania, South Australia, NSW and Queensland.

[44] The Default Market Offer (DMO) is a mechanism to safeguard consumers who don't, or can't, shop around for a new electricity deal. The DMO sets the maximum price energy retailers can charge electricity consumers on default plans, known as standing offer contracts. It also acts as a reference price. When promoting offers, retailers must compare the price of their offer with the DMO. The DMO applies to households and small businesses in New South Wales, South Australia and South East Queensland. The independent Australian Energy Regulator (AER) sets the DMO. It takes effect each year on 1 July.

Improving visibility and understanding of the issues

6.13 A consistent theme from early engagement is that the sector does not yet have a complete picture of how widespread access and choice issues are, which consumers are most affected, or what happens after consumers are declined electricity supply.

6.14 Better information could support earlier identification of risks, greater accountability, and more targeted responses by retailers, community organisations, government agencies, and regulators.

6.15 Areas where better visibility may be useful include:

(a) the number and reasons for credit-related refusals

(b) how many consumers are unable to secure electricity supply

(c) prepay disconnections, including repeated disconnections and duration

(d) regional disparities in meter capability and available access pathways

(e) exceptional onboarding practices and alternative access arrangements

(f) outcomes for medically dependent, disabled, and financially vulnerable consumers.

6.16 The Authority acknowledges that some improvements may require changes to monitoring and reporting over time. We are interested in whether additional information would materially improve understanding, practices and consumer outcomes.

Q37. What additional information, data and monitoring would help to improve understanding, practices and outcomes in relation to access and choice?

Strengthening mainstream pathways into retail electricity supply

6.17 A key issue in this paper is whether consumers with poor or limited credit histories are becoming increasingly reliant on a narrow set of access pathways — such as prepay, social retailing, or exceptional onboarding.

6.18 The Authority is interested in whether there are ways to support more consistent, transparent, and scalable pathways into post-pay electricity services.

6.19 Retailers have noted that some of these consumers can successfully maintain post-pay arrangements where there is support such as early engagement, tailored payment plans, and active customer management.

6.20 Potential areas stakeholders may wish to comment on include:

(a) clearer and more consistent alternative onboarding pathway

(b) improved pathways for consumers with limited or no credit history

(c) better engagement with consumers before supply is declined

(d) scaling successful hardship or onboarding initiatives across the market

(e) regulating requirement to supply a consumer (such as an ‘obligation to connect’)

Q38. What changes could support increased access to mainstream post-pay electricity services, and what role could retailers, government agencies, iwi and other support agencies play?

Improving outcomes for consumers using prepay electricity

6.21 Prepay currently plays an important role in the market by providing an access pathway for some consumers who may otherwise struggle to obtain electricity supply.

6.22 However, the preliminary evidence in this paper raises questions about whether prepay is currently operating as a sufficiently stable, competitive and sustainable pathway for all consumers who rely on it.

6.23 Areas where improvement may be needed include:

(a) support for consumers experiencing repeated disconnection

(b) pathways from prepay to post-pay services when more suitable

(c) encouraging greater innovation and product diversity within prepay markets

(d) improving protections for medically dependent consumers and other vulnerable households

(e) the long-term sustainability of prepay services.

Q39. How could outcomes for consumers using prepay electricity be improved while preserving any benefits that consumers value?

Supporting social retailing and community-based models

6.24 Social retailers and community-based models provide important support for some consumers experiencing hardship or exclusion from mainstream retail markets. However, these models remain relatively small in scale and may face operational, prudential, funding, hedging, and geographic constraints.

6.25 The Authority is interested in whether these models could be strengthened or scaled without concentrating responsibility for higher-risk consumers within a small number of providers.

6.26 Potential areas stakeholders may wish to comment on include:

(a) reducing barriers to entry or expansion for social retailers

(b) improving access to hedging arrangements or wholesale market participation

(c) stronger partnerships between social retailers, retailers, community organisations, and government agencies

(d) whether aspects of social retailing models could be adopted more broadly within mainstream retailing.

Q40. What role should social retailing and community-based models play in improving access and choice, and what are the risks of relying on them too heavily?

Improving access to suitable metering

6.27 Metering constraints may prevent some consumers from accessing prepay, social retailing, time-varying pricing, flexibility services, or other retail products.

6.28 Meter upgrades and emerging communication technologies are expected to reduce the number of legacy and non-communicating meters over time. However, some barriers may remain, including property access issues, local telecommunications coverage, tenancy or landlord constraints, household wiring issues, consumer preferences, and the commercial incentives facing retailers and metering equipment providers.

6.29 The Authority is interested in whether current arrangements are sufficient to address these barriers, or whether additional incentives, coordination, or support may be needed. Potential areas stakeholders may wish to comment on include:

(a) improving education and consumer awareness on benefits of adopting smart meter technology

(b) improving support for consumers facing landlord, tenancy, or property-related barriers.

Q41. Are current incentives for retailers to install communicating smart meters appropriate, and are particular regions, consumer groups or housing situations disproportionately affected by current metering arrangements?

Strengthening broader system and cross-agency responses

6.30 Some issues identified in this paper extend beyond electricity regulation. Access to electricity intersects with financial exclusion, housing quality, debt, income adequacy, hardship, health, and social support systems.

6.31 Stakeholders have suggested that stronger coordination between the electricity sector, government agencies and community organisations may help support more durable consumer outcomes.

6.32 Potential areas stakeholders may wish to comment on include:

(a) better alignment between electricity hardship responses and wider social policy tools

(b) support for bond or payment guarantee arrangements

(c) payment guarantees or underwriting arrangements and where these should sit (taxpayers or industry) faster or more accessible support pathways for consumers experiencing hardship

(d) stronger referral pathways between retailers, budgeting services, community organisations, and government agencies

(e) place-based or community-led approaches.

A shared challenge for the future electricity system

6.33 The broader issue raised by this paper is not only whether consumers can access electricity today, but also whether New Zealand's future electricity market will remain broadly accessible as the system becomes more digitalised, decentralised and reliant on active consumer participation.

6.34 The Authority's preliminary view is that the future market should not evolve in a way where consumers with the greatest financial resilience receive the greatest benefits from innovation, flexibility, and competition, while consumers facing hardship, credit barriers, or metering limitations are increasingly excluded from meaningful participation.

6.35 Improving access and meaningful participation is therefore not only a consumer protection issue. It is also relevant to long-term competition, market efficiency, electrification, and the overall performance of the future electricity system.

Q42. What opportunities are there for stronger cross-agency, community or partnership-based responses to improve electricity access and choice, and what should a well-functioning and inclusive electricity market look like over the next 5–10 years?

7 Next steps

Submissions, survey responses, research findings and data analysis

7.1 Consultation closes at 5pm on 11 August 2026. Following this, we will review submissions, survey responses, targeted research findings and relevant data.

7.2 The findings will inform the Authority's next steps. These may include further work on regulatory or non-regulatory options to improve consumer access and choice, as well as engagement with retailers, consumer advocates, community organisations, iwi, government agencies and other parts of the electricity sector.

7.3 The Authority has not predetermined any preferred solution. Any future options will be informed by the evidence gathered through this issues paper, consumer research, stakeholder feedback and further data analysis.

Appendix A Submission form

Improving Consumer Access and Choice

Submitter	

All questions are optional. Please answer as many or as few as you wish. Thank you.

Questions	Comments
Risks, impacts and market performance	
Q1. Do you agree with the risks identified for consumers who may have constrained access to electricity supply or limited retail choice? Please explain why or why not.	
Q2. What evidence is available on the number of consumers affected by these risks, the circumstances in which they arise, and the outcomes consumers experience?	
Q3. Are there particular groups of consumers, regions, housing situations or metering circumstances where these risks are more likely to occur?	
Q4. Do you agree that access and choice constraints may affect retail market performance? Please explain why or why not.	
Credit history and access to post-pay electricity	
Q5. Do you agree that consumer credit history or retailer credit-risk assessments may be limiting some consumers' access to electricity services or retail plans? Please explain why or why not.	
Q6. What factors influence whether a retailer accepts, declines or offers alternative arrangements to a consumer following a credit-risk assessment?	
Q7. Are there any existing practices, safeguards or support arrangements that are working well to help consumers with adverse or limited credit history access electricity supply?	
Q8. Are you aware of any unintended behaviours or consequences that may arise when consumers cannot access electricity supply in their own name? To what extent does this occur?	
Metering capability and access to services	

Q9. Do you agree that legacy and non-communicating smart meters may be limiting some consumers' access to electricity services, retail plans or retail competition? Please explain why or why not.	
Q10. What are the most prevalent barriers to upgrading legacy meters or restoring communication capability to non-communicating smart meters?	
Q11. What typically happens when a consumer needs a communicating smart meter to access a particular retail product or service, but an upgrade is delayed, declined, not technically straightforward, or cannot be arranged because the consumer does not have a retailer willing to serve them?	
Q12. How are the costs of meter upgrades, remedial work or communication issues currently managed, and are there circumstances where these costs may prevent consumers from accessing electricity services or retail choice?	
Q13. Are existing arrangements sufficient to address the remaining harder-to-upgrade premises, or are there opportunities to improve coordination between retailers, metering equipment providers, distributors, landlords and consumers?	
Constrained access can affect health, wellbeing and participation	
Q14. Do you have any further information or evidence on the number and characteristics of consumers affected by access and choice constraints, the circumstances in which these constraints arise, and what happens after a consumer is declined or cannot access a suitable retail service?	
Alternative access pathways	
Q15. Are the three main alternative pathways — prepay, social retailing and exceptional onboarding — sufficient, suitable and sustainable?	
Q16. Are there consumer groups, regions, network areas or metering circumstances where consumers currently face limited or no practical pathway to access retail electricity supply? If so, which consumers are most affected and what do they do?	
Prepay electricity	
Q17. Do prepay customers have sufficient access to pricing innovation and savings opportunities,	

including time-varying pricing, demand flexibility, free-hour offers or other emerging retail products? If not, what are the main barriers to making these options available to prepay customers?	
Q18. What role is prepay currently playing for consumers who cannot access standard post-pay electricity services, and what benefits does it provide for those consumers?	
Q19. Is there effective choice and competition in the prepay market, and what are the main operational, commercial, technological or regulatory barriers to offering prepay services?	
Q20. To what extent do prepay disconnections reflect consumer choice, budgeting preferences or temporary pauses in use, compared with circumstances where consumers are unable to top up?	
Q21. What information are retailers capturing that could help identify when repeated or longer prepay disconnections may indicate affordability pressure, difficulty maintaining supply, or other consumer impacts?	
Q22. Are additional pathways, safeguards or protections needed to reduce the risk that medically dependent consumers are placed on, or remain on, prepay arrangements?	
Q23. Do prepay customers have reduced access to innovation, competition and emerging opportunities to reduce electricity costs? If so, what technical, commercial or regulatory barriers may be preventing retailers from offering more innovative prepay products?	
Q24. Does the use of prepay arrangements to recover previously incurred debt create additional risks for some consumers, and how are debt-recovery settings calculated, managed and communicated to consumers?	
Social retailing	
Q25. Should social retailing remain a targeted community-based, industry-led response, or should it become a more substantial national access pathway for consumers who face barriers to standard post-pay electricity?	

Q26. What are the main barriers to scaling social retailing, including access to hedges, prudential requirements, metering capability, funding, referral pathways and operational capability?	
Q27. What forms of support, if any, would be most effective in expanding social retailing without crowding out existing providers or reducing incentives for mainstream retailers to support consumers in hardship?	
Exceptional onboarding	
Q28. Are there any other examples of exceptional onboarding for consumers with adverse or limited credit history onto standard post-pay plans, beyond the approaches outlined in this paper?	
Q29. How do consumers find out about what onboarding opportunities are available to access standard post-pay plans?	
Q30. How are benefit redirections being used to support access to electricity supply, and are consumers being declined supply if they are unable or unwilling to redirect their benefit?	
Q31. How many consumers with adverse or limited credit history are being offered contracts by retailers after third-party advocacy or referrals, and what are the benefits, risks and limitations of this approach?	
Proposed outcomes and areas for improvement	
Q32. Do you agree with the proposed outcomes, and are there additional consumer outcomes the Authority should consider?	
Q33. What international examples of approaches to ensuring electricity access for all consumers do you believe would be appropriate for the New Zealand context and why?	
Q34. Do you agree with the proposed areas for improvement, and are there additional areas the Authority should consider?	
Q35. Which areas should be prioritised for further work, and why?	
Q36. What practical steps, including any quick wins, could improve access and choice in the short term?	
Q37. What additional information, data and monitoring would help to improve understanding,	

practices and outcomes in relation to access and choice?	
Q38. What changes could support increased access to mainstream post-pay electricity services, and what role could retailers, government agencies, iwi and other support agencies play?	
Q39. How could outcomes for consumers using prepay electricity be improved while preserving any benefits that consumers value?	
Q40. What role should social retailing and community-based models play in improving access and choice, and what are the risks of relying on them too heavily?	
Q41. Are current incentives for retailers to install communicating smart meters appropriate, and are particular regions, consumer groups or housing situations disproportionately affected by current metering arrangements?	
Q42. What opportunities are there for stronger cross-agency, community or partnership-based responses to improve electricity access and choice, and what should a well-functioning and inclusive electricity market look like over the next 5–10 years?	