

1 September 2026

Submissions

Electricity Authority

Via monitoring@ea.govt.nz

To whom it may concern,

Consultation on updates to clause 2.16 notice

We appreciate the opportunity to provide feedback on the EA's proposed amendments to the OTC bids and offer data notice (clause 2.16). We support the expanded scope in the proposal. Our comments on each question are set out in the attached submission form.

Regards

Alex Macmillan
Energy Manager

Appendix C Submission form

Improving visibility of competition in the over-the-counter contract market - updates to clause 2.16 notice

Submitter	Octopus Energy NZ Limited
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Questions	Comments
Q1. Do you agree with the proposed update to the definition of industrial consumers captured by the notice by including those who are directly connected to the grid or who are a trader of electricity?	Yes. A more complete data set should improve the reliability of the competition monitoring the EA is able to carry out.
Q2. Do you agree with the proposed inclusion of energy brokers, where they are traders in electricity, as applicable participants in the notice?	Yes. The current notice only requires the requestor to report which misses broker initiated requests entirely. As per above a more complete data set should improve the reliability of competition monitoring.
Q3. Do you agree with changing the disclosure obligation for requests made through brokers?	Yes, as above. Clear guidance on which requests remain our responsibility versus that of the broker to avoid gaps or duplicates would be useful.
Q4. Do you agree with the inclusion of a column to capture generating station(s) to improve distinction between PPAs and contracts for firming?	Yes. We support this as a way to improve transparency between PPAs and firming contracts.
Q5. Do you agree with the inclusion of the <i>TradedHedgeID</i> and <i>OfferDeclineReason</i> columns in the notice to help identify traded contracts and the reasons for declining offers?	Yes. Aligning <i>TradedHedgeID</i> with the identifier already used under the hedge disclosure obligations allows the EA to match OTC requests to their outcomes. Capturing the reasons offers are declined is relevant to monitoring non-discrimination obligations.
Q6. Do you agree with the inclusion of a column to the notice to identify the reasons behind non-conforming offers?	Yes. It would be helpful if the EA published a list of common example reasons for this field so it can be completed consistently.
Q7. Do you agree with the proposed changes to improve the data submission? If not, why not? Do you have any suggestions?	Yes. Renaming <i>ContractID</i> to <i>ProductID</i> and adding the <i>Tranche</i> and <i>ResponseID</i> fields should make the notice easier to complete. We would also suggest the EA clarify its approach to subsequent changes to data previously disclosed. Has the EA considered whether a correction process is needed and if

Questions	Comments
	so how participants should flag this in a later submission?
Q8. Do you agree with the Authority's changes to the proposed notice listed in table 2?	Yes.
Q9. Do you agree the benefits of the proposed amendments to this clause 2.16 notice outweigh its costs? If not, what area(s) of the Authority's preliminary assessment of benefits and costs do you disagree with?	Yes. Almost all of the additional information required is a subset of data participants already hold for hedge disclosure purposes so the compliance cost is low relative to the transparency benefit.
Q10. Do you agree with the proposed changes to the notice?	Yes.