

14 September 2026

Submissions

Electricity Authority

Wellington

Via email: policyconsult@ea.govt.nz

Contact welcomes the opportunity to respond to the *Improvements to Switching Process* consultation and is supportive of several of the proposed changes.

Although several of the proposed initiatives have been under consideration for some time, we are concerned that the consultation has moved directly to Code review without first revisiting the original problem definitions and proposals or undertaking a cost-benefit analysis. These steps remain important to confirm that the issues are still material and that the proposed changes are relevant, proportionate and appropriate.

Accordingly, we have provided high-level feedback in the “Any Other Feedback” section below on some items that we consider may no longer be necessary, or which would benefit from further discussion and analysis. In particular, we consider it important to ensure that the costs associated with implementing and operationalising the proposed changes are proportionate to the volume and frequency of the issues being addressed, and that the anticipated benefits are sufficient to justify those costs.

We also note that some of the consultation items have previously been discussed and socialised through industry forums, primarily the SDFG working group. In some cases, those discussions resulted in proposals being refined or particular changes being considered for omission. However, it appears that these discussions and outcomes have not necessarily been reflected in the updated suite of proposed changes. We encourage these previous discussions and positions to be revisited as part of the current consultation process.

Q1. Would you prefer an implementation timeframe longer than 12 months?

If so, please indicate if 15 or 18 months is preferred and give reasons why.

Our preference in relation to the implementation timeframes is likely to be 18 months from the finalisation of the updated Code and amended functional specifications. We note that the proposed changes cover a broad range of participant roles and functions with notable interface and procedural components requiring extensive development and regression testing.

We will be unable to determine a concrete implementation timeframe until such a time as the Code and functional requirements are finalised.

Question 2: Are there any parts of the Code drafting that, in your view, do not accurately reflect the provisional decisions outlined in this paper?

If so, please identify the issue and set out any proposed amendment(s).

Part/ Clause	Comments
Part 1 Preliminary provisions 1.1 Interpretation	
Part 10 Metering Schedule 10.6 - Metering equipment provider ongoing obligations and functions	8A Authority may determine and publish mode of information exchange: It would be useful to understand whether the EA plans to act on this clause in the near term. Where systems and processes are already being developed or updated to support data exchange requirements, it would be preferable to build this capability into those changes now, rather than requiring additional updates in the future.
Part 11 Registry information management	
Schedule 11.1 Creation and management of ICPs, ICP identifiers and NSPs	
Schedule 11.2 Transfer of ICPs between distributors' networks	
Schedule 11.3 Trader switching	4(1) - Switch Event Dates: We would question exactly what problem the EA is attempting to solve by making changes to the event date and Retailer response timeframes. Shorter timeframes, combined with additional complexity based on meter type, may produce unintended or suboptimal outcomes by forcing retailers to complete switches before actual meter data is available, thereby increasing reliance on estimated readings. Just because there is a smart meter doesn't always mean we will receive the data within the refined timeframes. We still believe that the NZ market switching timeframes are completely acceptable, if not in the top performers globally,

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	and any changes to this will create cost for negligible further improvement. 18A – Trader must accept switch withdrawal: Contact supports streamlining the resolution of switching errors. However, the proposed one-business-day mandatory acceptance requirement for switch withdrawals should be conditional based on the withdrawal type and resulting investigatory and remedial effort, specifically (WP – wrong premise) withdrawals require more time to resolve. We recommend mandatory acceptance apply only where the withdrawal request is raised within two months of the switch completion date (CS date). Beyond this period, acceptance should be at the discretion of the receiving trader. Older withdrawal requests may require detailed investigation of customer records, meter data, billing, and market transactions. Mandatory acceptance could therefore create significant operational impacts and unintended customer, billing, settlement and reconciliation consequences. A two-month limit would balance the timely correction of genuine switch errors with the practical risks of resolving aged withdrawals. 11.39 – Meter Reading: Contact does not support the proposal to standardise meter readings to two decimal places. This change delivers no material benefit to the industry and would introduce significant unnecessary change and cost for all participants. We instead propose the Code require the switch event meter reading to be a truncated read. A truncated read would achieve the Authority's underlying objective of consistency in switch event meter readings, while being simpler and materially less costly for participants to implement.
Schedule 11.4 Metering equipment provider switching and registry metering records	
Table 1: Registry metering records Part 16A Audits	

Q3. Other feedback

If you have any other feedback on the draft Code amendments, please detail this below:

Part/ Clause	Comments
Event dates/Time slicing	The Code as it is drafted is somewhat difficult to determine what the exact intention is or resulting requirements are in relation to which events and attributes require time slicing. Previous conversations within the SDFG determined that time slicing functionality likely benefited very few real-life examples or use cases and we would introduce time slicing in the registry as a future proofing requirement. I.e. the time slicing functionality would essentially remain dormant until a tangible requirement was identified for its use. It is still our preference and recommendation that this be the case and that changes are only made to data points, interfaces and information exchanges that are of use. Otherwise, there will be resulting impacts to all registry interfaces and a significant development cost for very little benefit.
Meter Data – 11.39	The EA SDFG previously discussed metering data being extended to two decimal places and the majority of parties expressed a preference to truncate decimals as a practical and cost effective mechanism to reach the same accuracy outcome/ambition. A number of parties already have this functionality in place so any variance to the status quo is creating significant unnecessary change and cost for little to no benefit.