

14 September 2026

Submissions
Electricity Authority

Nova Energy Limited
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Nova Energy's submission to the Electricity Authority's consultation on Improvements to industry switching processes

Nova Energy Limited (Nova) welcomes the opportunity to comment on the Electricity Authority's technical consultation on proposed improvements to the Electricity Industry Participation Code 2010 relating to industry switching processes.

Nova supports the objective of modernising switching processes and improving the accuracy, efficiency and reliability of market operations. Our comments are therefore directed at ensuring the final drafting provides sufficient clarity for participants to implement the changes consistently and with minimal operational or customer impact.

In that context, Nova considers that several aspects of the proposed Code drafting would benefit from further clarification before the amendments are finalised. This includes the implementation timeframe, the sequencing and completion requirements for the gaining trader switch process, the obligation to provide switch event meter readings, the time limit for mandatory acceptance of certain gaining-trader withdrawal requests, and the interaction between acknowledgement and completion timeframes for move-in switches.

Nova considers that an 18 month implementation period would better support coordinated system development, testing and operational readiness, particularly given the dependencies on Registry design, metering processes and concurrent delivery of Bill Standardisation requirements. Nova also seeks clearer sequencing and completion requirements for the gaining trader switch process, including confirmation of how optional losing trader responses should affect switch completion.

Nova further seeks clarification of the obligation to provide switch event meter readings under clause 16(1A), a clear time limit on mandatory acceptance of certain gaining-trader withdrawal requests, and confirmation of how the acknowledgement and completion timeframes for move-in switches are intended to interact. These clarifications would help ensure the amendments can be applied consistently by participants and reduce the risk of switching, billing or customer-impact issues.

Nova's detailed comments and proposed amendments are set out in Appendix B. Thank you for considering Nova's submission. We would be pleased to discuss any aspect of this submission with the Authority.

Yours sincerely,



Kathryn Le Cheminant

Regulatory and Compliance Administrator

Appendix B – Technical submission form

Improvements to switching processes

Submissions should be emailed to policyconsult@ea.govt.nz with 'Consultation – Improvements to switching processes' in the subject line by 5pm, Monday 14 September 2026.

The Authority invites technical submissions on the Code amendment drafting to give effect to its decisions on ICP switching process changes. We are not seeking further submissions on the intended decisions or their supporting rationale.

Name	Kathryn Le Cheminant
Organisation	Nova Energy Limited

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.

Nova supports the proposed switching process improvements and associated Code amendments. However, Nova considers that an implementation period of 18 months following final Code amendments would be more appropriate than the Authority's preferred implementation timeframe.

The proposed changes will require significant development across retailer systems, switching workflows, Registry interfaces, metering integrations, compliance monitoring processes and customer billing platforms. The scope of many of these changes cannot be fully understood until the Registry solution design and associated technical specifications are confirmed. Nova is concerned that participants may be required to commence solution design and development activities before there is sufficient certainty regarding Registry functionality, increasing the risk of rework, implementation inefficiencies and additional costs.

Nova is also currently undertaking substantial system development in order to meet the Authority's Bill Standardisation requirements, due to take effect in April 2027. Under the proposed implementation timeline, retailers would be required to deliver two significant regulatory change programmes simultaneously, competing for the same business, technology, testing and operational resources. This overlap increases delivery risk and may impact the quality and effectiveness of implementation for both programmes.

In addition, retailers cannot implement these changes in isolation. Successful implementation will be dependent on the readiness of the Registry, metering equipment providers, software vendors and other industry participants. Adequate time is required for participants to understand final requirements, build and test solutions, resolve cross industry issues and complete end-to-end market testing. An 18 month implementation period would provide greater certainty that all parties can deliver coordinated and stable implementation outcomes.

Nova is also concerned that the proposed timeline or 15 month option places participant training, operational readiness and implementation activities across the October to January period. This is traditionally a constrained resourcing period for many participants due to annual leave and reduced availability of key personnel. Compressing these activities into this timeframe may increase implementation risk and reduce the opportunity for effective training and embedding of new processes.

Most importantly, insufficient implementation time increases the risk of unintended consumer impacts following go-live. Switching processes directly affect customer transfers between retailers and rely on

the accurate exchange of metering and Registry information. Inadequately tested solutions increase the likelihood of switching errors, delayed transfers, billing issues and customer complaints. Nova considers that consumers will ultimately benefit more from a well-tested, reliable implementation than from an accelerated delivery timeframe.

While Nova supports the intent of the proposed changes, the benefits sought by the Authority will only be fully realised if participants are provided with sufficient time to design, build, test, train and implement the required system and process changes. Nova therefore considers that an 18 month implementation timeframe strikes a more appropriate balance between timely delivery and implementation quality, reducing industry and consumer risk while supporting a successful transition to the new switching processes

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	None
Part 10 Metering Schedule 10.6 - Metering equipment provider ongoing obligations and functions	None
Part 11 Registry information management	None
Schedule 11.1 Creation and management of ICPs, ICP identifiers and NSPs	None
Schedule 11.2 Transfer of ICPs between distributors' networks	None
Schedule 11.3 Trader switching	The proposed amendments relating to Trader switching raise the following concerns: <u>Clauses 15(1) and 16(1) - Gaining trader switch process</u> Concern: Nova understands the intent of making the gaining trader switch process more efficient where a losing trader response is optional. However, clauses 15(1) and 16(1) would benefit from further clarification to ensure the response and completion pathways are practical and consistently understood. In particular, the drafting does not clearly address what should happen where the losing trader does not provide an optional response.

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).

Concern: Nova also seeks clarification on the intended sequencing for switch completion. As drafted, it is not clear whether the gaining trader may complete the switch immediately, must wait until the losing trader has responded, or must wait until the response period has expired. Without this clarification, there is a risk of inconsistent industry practice, including switches being completed before the losing trader has had a reasonable opportunity to respond, or switches remaining in progress for longer than intended.

Proposed amendment: Nova recommends that the Authority clarify the intended sequencing for both response and non-response pathways. The Code should state when the gaining trader may complete the switch, confirm that completion should not occur before the losing trader has responded or the response period has expired, and specify a clear completion timeframe that applies where no response is provided.

Clause 16(1A) – Switch event meter readings

Concern: Nova understands the intent of ensuring accurate switch event meter readings are available for relevant switches. However, clause 16(1A) would benefit from further clarification to ensure the obligation is practical and capable of being applied consistently. In particular, it is not clear how the gaining trader would be expected to provide switch event meter readings at switch completion where the relevant meter data or interface access may only become available after completion through the MEP process.

Concern: Nova also seeks clarification on the scope of the obligation. As drafted, clause 16(1A) appears capable of applying to standard category 3 or higher HHR to HHR commercial and industrial switches under clause 13(1)(a)(i). If the policy intent is instead to address NHH to HHR or HHR to NHH meter change scenarios under clauses 13(1)(a)(ii) and (iii), Nova considers this should be made clear in the drafting. Nova would also appreciate confirmation that “gaining trader” is the participant intended to provide the reading in these circumstances.

Proposed amendment: Nova recommends that the Authority clarify which participant is responsible for providing the relevant switch event meter reading, what information must be provided, and the timeframe that applies where the reading depends on MEP data access following switch completion. If clause 16(1A) is intended only to apply to meter change scenarios, Nova recommends amending the clause so that it applies only to gaining trader switches

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

	initiated under clauses 13(1)(a)(ii) and 13(1)(a)(iii), and not to clause 13(1)(a)(i). A clear and agreed timeframe would be preferable to drafting that is open to interpretation or difficult to monitor in practice. <u>Clauses 17, 18 and 18A – Switch withdrawals</u> Concern: Nova supports the intent of improving switching processes and recognises the benefit of aligning withdrawal settings with reconciliation processes where this is workable. However, the proposed 14 month withdrawal period may have practical implications that would benefit from further clarification, particularly if the reconciliation framework changes over time. Nova would also appreciate confirmation of how the proposed withdrawal window is intended to interact with Bill Standardisation requirements, including any limits on the period within which customer invoices can be corrected. Concern: Nova is concerned that mandatory acceptance of specified withdrawal requests initiated by a gaining trader may create operational and customer impact risks if no time limit applies after switch completion. In particular, a losing trader could be required to take an ICP back well after the gaining trader's onboarding, validation and customer transfer processes should reasonably have identified the relevant issue. Proposed amendment: Nova recommends that mandatory acceptance of gaining trader withdrawal requests for MI and WP reasons be limited to requests submitted within 30 calendar days after switch completion. After that period, the receiving trader should be able to assess the request on its merits, having regard to the facts of the case and any potential customer impact. Nova also asks the Authority to confirm the withdrawal codes to which any time limited mandatory acceptance rule is intended to apply.
Schedule 11.4 Metering equipment provider switching and registry metering records	None
Table 1: Registry metering records Part 16A Audits	None

Q3. Other feedback

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

Schedule 11.3 - Trader Switching

The proposed MI switch timeframes appear inconsistent. The AN timeframe allows up to two business days following receipt of the NT file, while the CS timeframe requires completion within one business day of the NT file where no switch event date is specified. This appears to permit completion of the switch prior to expiry of the AN response period. We request clarification whether AN files are intended to be purely optional and non-blocking, or whether the CS timeframe should commence after the AN response period has expired.