

Submission form

Improving Consumer Access and Choice

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

Responses to selected consultation questions

Questions	Bluecurrent's comments
Risks, impacts and market performance	
Q3. Are there particular groups of consumers, regions, housing situations or metering circumstances where these risks are more likely to occur?	Bluecurrent recognises that while smart meter penetration in New Zealand is already very high (around 96 percent), there are regions where the proportions of legacy meters remain in the double digits. As a smart metering and data services provider, we appreciate the opportunity to provide information and insights on metering that informed the development of this Issues Paper. We look forward to continuing to engage with the Electricity Authority (the Authority) and other stakeholders to help ensure that New Zealanders, regardless of where they live, can meaningfully participate in electricity markets and benefit from new and innovative services enabled by smart meters.
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.	Bluecurrent agrees that legacy and non-communicating smart meters may limit access by some consumers to electricity services, retail plans and retail competition. Replacing legacy meters with smart meters and converting non-communicating smart meters to communicating meters allow consumers to meaningfully participate in innovative market offerings that are likely to benefit them, such as demand response programmes. For example, customers with smart meters can benefit from participating in retailers' Dynamic Load Control programmes that Bluecurrent enables.

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	Smart meters also enable cost-effective and timely switching, giving consumers greater control over the choice of their retailer or pricing plan, and when and how they use and produce electricity. Consumers opting for prepay services also need smart meters that allow remote disconnection and reconnection.
Q10. What are the most prevalent barriers to upgrading legacy meters or restoring communication capability to non-communicating smart meters?	Bluecurrent agrees with the prevalent barriers to upgrading legacy meters or restoring communication capability to non-communicating meters identified in the Issues Paper. These barriers include: • Consumer-related issues, including where the consumer chooses not to have a smart meter installed • Tenancy or property constraints • Access to premises issues • Health and safety concerns • Physical or building-related issues, e.g. unsafe wiring, asbestos • Lack of telecommunications coverage or signal issues • Cost-related barriers that could include the cost of remedial work, property upgrade or other installation-related costs that could make proceeding with a meter upgrade impractical or unaffordable for the consumer or property owner. We welcome the new requirement on large retailers to offer time-varying pricing plans to customers, from 1 July 2026. This will provide added impetus for the replacement of the remaining legacy meters with smart meters and help optimise the value of smart meter data that is already being generated in the market.
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	Electricity retailers are best placed to comment on their willingness to serve some types of consumers. Metering service providers' contracts with retailers enable us to request meter upgrades, but without a

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be arranged because the consumer does not have a retailer willing to serve them?	request from a retailer, a metering service provider is unable to upgrade the meter.
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?	As implied in our response to Q11, Bluecurrent's programme of work for replacing legacy meters with smart meters is driven by demand from retailers. Meter replacements/upgrades are covered by our commercial arrangements with the relevant retailer(s). There are costs to some meter upgrades that cannot be addressed by changes to the regulatory framework, i.e. beyond the scope of the <i>Electricity Industry Participation Code</i> (the Code) or regulations. These could include instances where a customer refuses to have a smart meter installed (e.g. due to health-related concerns), or is unable to meet the cost of making his or her premises ready for the installation of a smart meter (e.g. addressing wiring compliance issues, or lack of incentives for some landlords to meet the cost of making their premises ready for smart meter installation). The above instances may require more focused/targeted approaches that involve coordinating with organisations beyond the electricity sector, e.g. government agencies, not-for-profit organisations, or trusted intermediaries. See our response to Q41 regarding potential approaches to addressing non-regulatory barriers to the transition to smart meters in overseas jurisdictions.
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?	Bluecurrent works extensively with our telecommunications providers to improve smart meter coverage. For harder-to-upgrade premises, new or alternative technologies could provide an extra option. For example, the issue of mobile signal 'black spots' that disincentivise upgrading from legacy meters to smart meters, or prevent the conversion of non-communicating smart meters to

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	communicating meters, could potentially be addressed using alternative or advanced technologies. In releasing its <i>2026 Annual Telecommunications Monitoring Report</i>, the Commerce Commission noted that: . . .new technologies are beginning to reshape competition and consumer choice. Satellite technologies are changing the economics of rural service provision, creating new options for consumers and intensifying competition across the market... For the first time, rural consumers can access broadband speeds that rival the urban experience. Consumers are responding to those new options and making active choices about the services that best meet their needs. Local providers are holding their ground in the face of intensifying competition by differentiating themselves...and through service improvements and sharper pricing.¹
Proposed outcomes and areas for improvement	
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?	As indicated in our response to Q12, more focused/targeted approaches may be appropriate for regions that have persistently low smart meter uptake. For example, the Authority – in collaboration with retailers – could consider launching an educational campaign in these regions (or nationally) on the benefits of participating in new/innovative market offerings that can benefit them. New services that can benefit consumers, such as demand response programmes that use solar PV, battery or electric vehicles, almost always require the use of smart meters.

¹ <https://www.comcom.govt.nz/news-and-media/news-and-events/2026/telecommunications-market-enters-new-phase-of-change-as-technology-reshapes-competition/>

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	We encourage the Authority to consider FlexForum's² recent advice to the Electricity Retailers' and Generators' Association of New Zealand (ERGANZ) that identifies flexible customer propositions that can be adopted in New Zealand to support vulnerable and low-income households.³ Many of the overseas approaches outlined in the FlexForum report involve collaborating with parties outside of the electricity sector such as housing providers and local authorities, and working alongside trusted intermediaries and community voices.⁴

² FlexForum brings together people and organisations from across the electricity ecosystem to work together to make it easy for households, businesses and communities to maximise the value of their flexible electricity resources. Bluecurrent is a member of FlexForum.

³ <https://flexforum.nz/wp-content/uploads/2026/07/Flex-Forum-Advice-to-ERGANZ-with-Scan-inserted-June-2026-final-1.pdf>

⁴ *Ibid.*