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.	Yes. An additional potential risk is that people with constrained options may ask friends or family members to set up power plans in their names, then later get accused of fraud (which may result in disconnection).
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?	On number of consumers affected: - 4.10(a) Retail Data on number of customers declined due to credit history. - what proportion of declines are due to meter type. On the circumstances in which these situations arise - Monitoring which companies are acting as retailers of last resort - Monitoring which companies will take people with non-communicating meters - Data on smart-meter penetration On the outcomes consumers experience: - 4.10(c) Monitoring prepay prices, comparing with average post-pay prices that would be available to people without adverse credit. - 4.10(f) retail data on the number of MDCs that are also on prepay
Q3. Are there particular groups of consumers, regions, housing situations or metering circumstances where these risks are more likely to occur?	Renters People on low incomes
Q4. Do you agree that access and choice constraints may affect retail market performance? Please explain why or why not.	Yes. - There is a risk that reduced competition among prepay providers results in higher prices. In 2023, Consumer NZ research found that prepay customers were paying up to 17% more for power, compared to people on pay-monthly plans.

	https://www.consumer.org.nz/home-and-living/home-energy/prepay-customers-paying-much-more-for-power Since then, we have asked prepay providers multiple times whether their prices are higher than their cheapest pay-monthly plans, and they have assured us they are not. This remains an ongoing concern. **We recommend that the EA monitor prepay prices closely to ensure people with fewer options are not penalised.** - There is certainly a risk that some customers miss out if their meter type does not allow them to choose time-of-use or EV plans, or enable them to sell solar power. - There is also a risk that adverse-credit customers will become concentrated among a small number of retailers. As social retailing expands, they will become experts in supporting these customers. That is good to a degree; however *all* retailers should be expected to support low-income customers, as this is part of doing business when providing an essential service. This should not be simply outsourced to social retailers.
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.	Yes. Retailers have told us that it is standard practice to conduct credit checks. In 2025 in collaboration with NZ Herald we asked all major retailers to tell us how many people they declined due to credit score. Their answers are in the screenshots attached. We also hear anecdotes of people having difficulty finding a retailer who will accept them. Eg., from winter 2025: *"I'm with 2Degrees at the moment… I went with a company that accepted me. I have poor credit and some power companies refused to take me on, but the price is ridiculous."*

	Examples also appear in the Facebook group "Cheaper living Aotearoa", eg these posts and comments from late 2025 and 2026: 
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?	A great example is Toast Electric's energy wellbeing programme, which provides discounted electricity to hundreds of people on lower incomes.
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?	I have heard of someone putting an extension cord over the fence to their neighbour who got disconnected due to credit issues. In this video a woman with poor credit history due to family violence describes having to ask a friend to use her name so she can sign up for power.

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.	Yes. In addition, non-communicating meters also result in higher fees for customers facing disconnection for non-payment. Our 2024 research into disconnection fees *"Unclear, unkind and unreasonable"* found that when site visits were required, the majority of companies charged at least $160 and some charged as much as $300 for the total of disconnection and reconnection fees in cases of nonpayment. This was significantly higher than the totals for remote disconnection/reconnection fees, which for many companies sat around $50 (though some were still charging up to $175 total). In 2025 there were at least 8918 post-pay customers disconnected for non-payment at least once, and most would have had to pay disconnection/reconnection fees. It is an unfair extra cost that they must pay higher fees due to not having smart meters.
Q10. What are the most prevalent barriers to upgrading legacy meters or restoring communication capability to non-communicating smart meters?	Renters will not have the authority to upgrade their meters. **We recommend that the Electricity Authority advocate for the government to amend the Healthy Homes Standards** to require landlords to install smart meters in rental properties. The phase-out period should be kept short. This would accelerate the spread of smart meters. The EA could also explore ways to create incentives for retailers and other entities to offer meter upgrades.
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?	I don't know, but clarity is needed about who is responsible for the task of upgrading meters and who pays the cost.

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?	Yes these costs will prevent consumers having retail choice. In rental properties, if the upgrade requires other costly work (like rewiring), the landlord may delay or decline it. The renter will live with the consequences of decreased choice and higher prices.
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?	Existing arrangements are not sufficient, there are likely to remain landlords that are unwilling to pay for meter upgrades (especially if extra work such as rewiring is also required). I recommend making it a requirement in the Healthy Homes Standards to provide a smart meter.
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?	The numbers of people affected by these constraints are likely to rise, as more people fall into debt due to cost-of-living pressures.
Alternative access pathways	
Q15. Are the three main alternative pathways — prepay, social retailing and exceptional onboarding — sufficient, suitable and sustainable?	No, the alternatives are not currently sufficient.. You have described their limitations well in 5.4. Further limitations of prepay: - Prepay customers have fewer protections under the Consumer Care Obligations - Not a good option for MDCs - Not available for all meter types - It has at times been more expensive than post-pay plans (this requires constant monitoring) - Some prepay customers would prefer a post-pay plan but cannot access one - Frequent disconnections, detrimenting health. Social retailing has great potential, especially because it offers genuine discounts for people who

	need it, however at present it is limited in geographic coverage and reliability of hedges. Exceptional onboarding has potential but it is *ad hoc* and usually does not provide genuine or significant discounts. **The solutions lie in:** - **Ensuring there is a retailer of last resort and/or a 'right to connect'** - **Expanding social retailing that offers genuine discounts to people who meet certain criteria, everywhere in the country** - **Ensuring that everyone (regardless of credit history) has a way to access post-pay plans.**
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?	No
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?	Prepay providers have functioned as a 'retailer of last resort' but not a reliable one, as there is no guarantee they will continue to accept customers. Some customers enjoy aspects of prepay, such as feeling in control of their spending. However there are risks that some customers may 'budget' by disconnecting frequently, which can detriment health.
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?	“Choice” and “budgeting preferences” are not truly choices when finances are extremely tight. I don’t know of any surveys or research that could answer this question.
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?	Amend the Consumer Care Obligations to prohibit prepay for MDCs.
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?	Yes, for instance with some providers they can’t access time-of-use plans.
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?	Yes.
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?	The goal needs to be enabling everyone who meets a certain criteria of hardship to access discounted electricity (because there will always be a group who cannot afford market rates). Expanding social retailing nationwide is one option for delivering this. ‘Social retailing’ needs to be carefully defined. There are also other ways to deliver this goal, such as subsidies, or bulk-buying power specifically for people on low-incomes to access.
Q26. What are the main barriers to scaling social retailing, including access to hedges, prudential requirements, metering capability, funding, referral pathways and operational capability?	Access to hedges

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?	People in hardship deserve the most cost-effective electricity NZ can supply. Hedges for social retailers should be available at whatever price is given to Tiwai Point.
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?	Can be very hard, and sometimes you need to know to ask for it.
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?	Agree
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?	Agree
Q35. Which areas should be prioritised for further work, and why?	B,c, d, e
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?	How many refusals of electricity supply were due to meter type. Monitoring of which companies are accepting people of what credit score.
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?	Amend the code to require that prepay providers (including their parent companies) set their prepay prices no higher than their cheapest post-pay plan.
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?	There is a risk that as social retailers expand, other retailers simply 'outsource' difficult customers to them. This should be avoided, as serving poor credit customers should be part of the business of providing an essential service.
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?	