CEN Submission: Improving Consumer Access and Choice

Submitted by: Community Energy Network (CEN)

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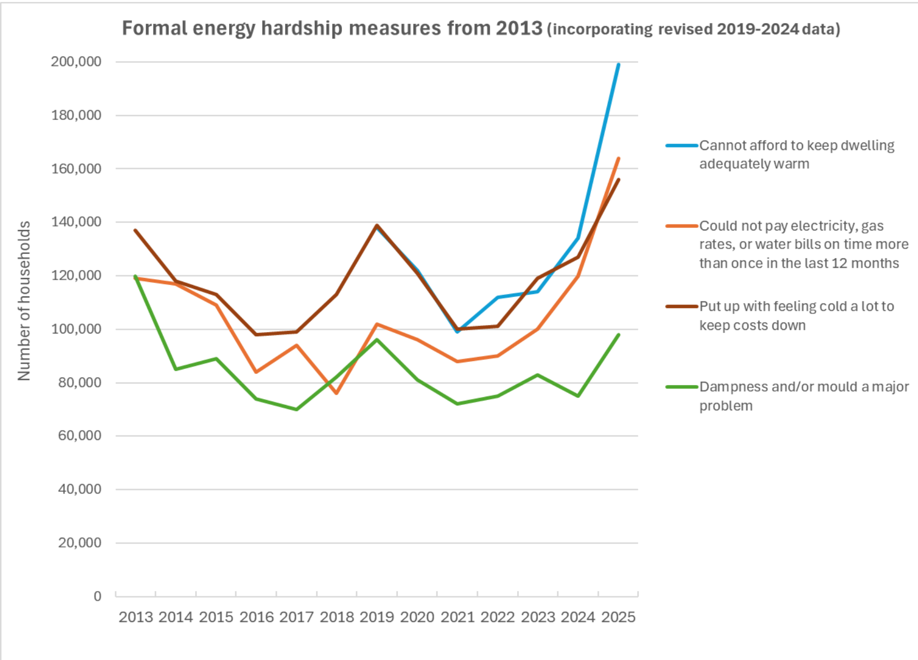
In response to: Electricity Authority Issues Paper, Improving Consumer Access and Choice (30 June 2026)

Executive Summary

Community Energy Network (CEN) welcomes the opportunity to submit on the Electricity Authority's Improving Consumer Access and Choice issues paper. CEN is a federation of over 30 community enterprises that have worked to increase energy wellbeing across New Zealand for around 25 years. Since 2009, CEN members have assessed more than 300,000 homes, completed over 175,000 retrofits, and given thousands of community workshops (alongside CEN co-owning the Home Performance Advisor training programme) giving us deep experience with the issues this paper is concerned about.

CEN agrees that credit history and metering capability are real and significant barriers to electricity access and choice. However, our frontline experience points to something deeper sitting behind both: New Zealand has no nationally cohesive and coordinated, trusted, locally-delivered system connecting energy-hardship households to the solution pathways. These solutions are based around supporting prepay, social retailing, exceptional onboarding, assessment of issues, advice and retrofits. The evidence bears this out. Formal hardship measures show the number of households unable to afford adequate warmth nearly doubled between 2021 and 2025, even as substantial investment and multiple access pathways operate in parallel across the system.



CEN's core recommendation to this consultation is that the Authority support the establishment of an Energy Wellbeing Network (EWN): a nationally coordinated, regionally and locally delivered system uniting the Energy Hardship/Healthy Homes and Community Energy sectors. A core function of the EWN would be to increase capacity and capability of the healthy homes and community energy education and advisor sector, training and supporting the assessors and advisors who work directly in communities and in people's homes. This work must sit with high-trust local people and organisations: the same community enterprises already doing this work today, because they are the ones households already trust enough to let into their homes and their financial lives.

Many of the access and choice issues raised in this paper, particularly around alternative pathways, exceptional onboarding, and identifying consumers in hidden hardship, cannot be solved by the current structure of the electricity market. They depend on someone trusted being present in the household to identify need, refer, and follow up. Currently, that role is performed informally, inconsistently, and without stable funding by CEN members and similar organisations. Beacon Pathway's 2026 research into the home energy advice sector confirms this: the sector is fragmented, uncoordinated, has no system-wide standards, and is currently in decline even as need grows.

CEN's detailed responses to the Authority's questions are set out below, using the Authority's submission form format. In summary, we recommend the Authority:

- Recognise, in its final view, that a coordinated national advice and referral layer (provided through the EWN) is a precondition for the alternative access pathways provided in this paper.
- Support funding and formal recognition of the referral and advocacy work already being performed informally by community organisations.
- Back the national scale-up of the existing ERGANZ Triage Pilot (with provision made for elements to be redesigned following evaluation early next year) and reverse the decline of the Eco Design Advisor service.
- Coordinate meter upgrades with the trusted-provider home visits already occurring under Warmer Kiwi Homes, Healthy Homes Initiative and other national or regional programmes, rather than treating metering as a separate, disconnected retailer-led process.
- Invest in the Energy Wellbeing Evaluation Consortium (EWEC) as the shared national data backbone connecting hardship, access and referral outcomes across government, retailers, networks and community providers.

CEN welcomes the opportunity to work further with the Authority, retailers, metering providers, government agencies, iwi and consumer advocates to build this connected system.

Specific Responses to Consultation Questions

The table below follows the Authority's submission form (Appendix A) structure. As invited, CEN has answered the questions most relevant to our expertise and experience; where a question falls outside CEN's direct knowledge, we have noted this rather than speculate.

Question	CEN Response
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.	CEN agrees with the risks identified. Our members see these risks daily through 25 years of home visits and retrofit delivery to households in energy hardship. We would add one further risk that is only partly captured in the paper: consumers who never enter the formal system at all. These consumers self-ration, rely on whānau or community support, or actively avoid contact with retailers, regulators and other institutions. This 'hidden hardship' population is an identified group that a nationally-coordinated, locally-delivered Energy Wellbeing Network (EWN) would be designed to reach, through trusted community organisations already embedded in these households' lives.
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?	Formal energy hardship measures show a sharp deterioration: the number of households reporting they cannot afford to keep their dwelling adequately warm rose from around 100,000 in 2021 to almost 200,000 in 2025 (see chart above). This tracks closely with other national indicators: over 360,000 households struggled to pay their power bill in the past year, and low-income households spend more than 7.5% of income on electricity compared with 1.3% for the wealthiest. We are aware of research from other institutions that put the number of households in some form of energy hardship closer to 550,000-600,000. These numbers indicate the scale of unmet need sitting behind the access and choice barriers this paper identifies. It appears that the sector has little clarity of the drivers for legacy-meter or third-party-access customers, and almost nothing about those who could connect but won't, a gap CEN agrees is significant and reinforces the case for the EWN's proposed research and evaluation function.

Question	CEN Response
Q3. Are there particular groups of consumers, regions, housing situations or metering circumstances where these risks are more likely to occur?	CEN member experience and feedback shows a strong regional overlap between the Authority's legacy/non-communicating meter 'hotspot' regions (Waitaki, West Coast, Tai Tokerau and Tairawhiti) and the regions where CEN members report the highest concentration of unmet structural retrofit need. This is not a coincidence: both reflect the same underlying pattern of older housing stock, lower incomes, and thinner retail and network service infrastructure. Renters, medically dependent consumers, disabled people, and Māori and Pacific households are consistently over-represented in both datasets.
Q4. Do you agree that access and choice constraints may affect retail market performance? Please explain why or why not.	Yes. This mirrors a finding from the Energy Transition Framework's Cost & Affordability Working Group Stage 1 report, which identifies an emerging 'two-speed transition': households able to invest in electrification, efficiency and flexibility access lower long-term costs, while those who cannot access capital, suitable housing or information are left exposed to legacy costs. Constrained access and choice (such as maintaining use of legacy meters) are two of the mechanisms that drives this divide.
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. CEN member organisations regularly support households referred to them by budgeting services and social agencies specifically because they have been declined electricity supply on credit grounds. We recognise that there have been efforts, in recent years, by the larger retailers especially to mitigate this issue. However, we are seeing many whanau who are unwilling to change retailers because of perceived risk of disconnection or receiving higher prices from being seen to be less loyal.
Q6. What factors influence whether a retailer accepts, declines or offers alternative arrangements to a consumer following a credit-risk assessment?	This sits outside CEN's direct expertise as a non-retailer. However, our community-based advisors consistently observe that early engagement and third-party advocacy materially change outcomes for households who would otherwise be declined. The EA should acknowledge that there are elements of this issue that sit outside the energy sector (such as whanau interaction with MSD or health providers). This is another reason why the EWN would be so useful as these wider social networks are able to be brought in to the programmes the energy sector engage with.
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?	Benefit redirection, guarantor arrangements and pilots such as ConnectMe can work well, but their success depends heavily on advocacy capacity within community organisations. That capacity is currently unfunded, inconsistent, and dependent on goodwill rather than a resourced system. This is precisely the gap the EWN's Training and Education, and Triage and Referral pillars are designed to fill. Noting that ERGANZ's EnergyMate programme had the potential to provide part of this support infrastructure but has been discontinued. A properly funded and redesigned EnergyMate style programme should be looked into.
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?	Yes. CEN member advisors report households using another person's name or account when declined supply, consistent with what the Authority has heard from retailers. This creates downstream complications when our members are separately supporting these households with retrofit, healthy homes or other services under a different account holder's name. This also opens to the door to issues such as financial abuse.
Metering capability and access to services	
Q9. Do you agree that legacy and non-communicating smart meters	Yes. As noted in response to Q3, the regions with the highest concentration of legacy meters closely match CEN's own high-deprivation retrofit waitlist

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may be limiting some consumers' access to electricity services, retail plans or retail competition? Please explain why or why not.	regions, indicating these barriers are compounding for the same households. Noting that the feature of a group in society who remain 'sticky' with regard to legacy meters represents the issue of low trust in the sector. The solution(s) to this issue need to be codesigned with those who understand this low trust issue the most – those who work with these people all the time. A centralised, 'one-design' programme that focuses on tweaking current market settings will fail to address this issue.
Q10. What are the most prevalent barriers to upgrading legacy meters or restoring communication capability to non-communicating smart meters?	Through retrofit delivery, CEN members regularly encounter the same barriers that block WKH eligibility also blocking meter upgrades: landlord consent, unsafe wiring, and poor physical access and low trust. These are frequently the same homes facing multiple problems simultaneously (and are therefore overwhelmed by the number of issues that need to be dealt with). Note that we have had verbal feedback from a member in one of these regions that an organisation with high trust in the community has explicitly told community members in a workshop to not accept offers to replace legacy meters.
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?	CEN members report becoming the practical last resort for advice and advocacy in exactly this circular-barrier scenario, despite this not being a funded or formally recognised part of our members' role.
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?	CEN does not hold data on retailer cost allocation practices but notes that any cost stacks on top of retrofit and repair costs already facing the same low-income households, compounding the barrier rather than resolving it in isolation. We are aware that some retailers are starting to offer free meter upgrades but that take up of that offer has been slow. We refer again to the issue of low trust.
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?	No, we do not believe existing arrangements are sufficient. CEN recommends coordinating meter upgrades with the trusted-provider home visits already occurring under WKH, HHI, and other regionally run programmes rather than treating metering as a separate retailer-led process disconnected from the assessments and retrofit visits already happening in the same home.
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?	Beacon Pathway's 2026 research into the home energy advice sector (commissioned in part to inform system design work in this space) found the sector is not connected or coordinated, has no system-wide standards, no stable funding base, and services are currently declining even as need grows. This matters directly for this consultation: without a coordinated advice and referral layer, consumers declined electricity supply have no consistent, trusted pathway to find out what happens next or where to turn.
Alternative access pathways	

Question	CEN Response
Q15. Are the three main alternative pathways — prepay, social retailing and exceptional onboarding — sufficient, suitable and sustainable?	No. Each pathway individually may be well designed, but consumers can only benefit from them if they know they exist and are supported to access them. CEN's frontline experience and the Beacon advice-sector research both show that the layer connecting consumers to these pathways is itself fragmented, under-resourced, and inconsistent across the country. Establishing the Energy Wellbeing Network, with a resourced Triage and Referral Platform (or redesigned EnergyMate style programme), is central to making these three pathways actually work at the scale intended.
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?	This mirrors the regional pattern described in Q3 and Q9: areas with high legacy meter prevalence and high housing deprivation overlap significantly. Medically dependent consumers, disabled people and renters are most affected. In CEN's experience, many of these households turn to whatever community organisation they already have a relationship with, whether or not that organisation has an electricity-specific mandate or funding to help.
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?	CEN does not hold retail market data on this question and defers to retailers and market participants with direct visibility of these products.
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?	Through our retrofit and advisory work, CEN sees that prepay customers value the budgeting control it offers, but many are the same households who need structural retrofit support to durably reduce the underlying energy demand driving high bills. Prepay and structural intervention need to be considered together, not as separate tracks. CEN notes SEA's submission adds an important nuance worth incorporating: SEA's qualitative research found some communities, including many Pasifika households, actively prefer prepay for the self-efficacy of managing their own disconnection without the whakamā of contacting a retailer directly. This doesn't remove the real cost and disconnection-frequency risks CEN sees in practice, but it complicates a purely deficit-based framing of prepay, and CEN agrees any future prepay reform should preserve this choice and dignity for households who value it.
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?	No strong view; this is a retail market question outside CEN's direct expertise. We would note though that the wording of this question opens to door to challenges of what 'effective choice' means. In this case, could effective be defined as 'easy to understand'? If so, then we do not think there is effective choice as there is still considerable confusion in our communities around how plans are structured and what they mean in the home.
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?	CEN's in-home advisors regularly see repeated disconnection as a symptom of a cold, poorly insulated home that requires more electricity than the household can afford, rather than simply a budgeting choice. We recommend disconnection-pattern data be used as a referral trigger into retrofit and advice pathways, a function the EWN's Triage and Referral Platform would be designed to perform. CEN also challenges the terminology in this question as it may highlight blindspots in how the EA perceive the issues. 'Consumer choice' and 'budgeting preferences' may adequately account for a squeezed middle type customer/issue but are a wholly inadequate description of those in genuine

Question	CEN Response
	hardship (when 'budgeting preference' is based on whether a parent keeps the house warm enough to stop their child going to the hospital again or buys enough food for them to be able to go to school for example).
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?	CEN does not hold retailer data systems information but notes that repeated disconnection data would be highly valuable if shared, with consent, into a national referral platform such as proposed in the EWN.
Q22. Are additional pathways, safeguards or protections needed to reduce the risk that medically dependent consumers are placed on, or remain on, prepay arrangements?	Yes. Retailers alone often lack visibility of medically dependent status; CEN's in-home advisors frequently identify this need through direct household contact. A standing local point of contact, such as an EWN supported community navigator, would help identify medically dependent households proactively rather than relying solely on retailer disclosure processes.
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?	No strong technical view, but this risk mirrors CEN's broader concern about a two-speed transition, where only households with capital and technology access benefit from flexibility and pricing innovation, as identified in the Energy Transition Framework's Cost & Affordability Working Group Stage 1 report.
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?	CEN does not hold data on specific debt-recovery settings, but flags that automatic top-up deductions increase disconnection risk for households already in hardship. Greater transparency, and consideration of a cap on the deduction rate, would help protect the most vulnerable prepay customers.
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?	CEN's strong view is that social retailing should scale into a substantial national access pathway. However, this must be underpinned by coordinated national infrastructure, not left to scale in isolation. 'Social retailing' (a practice some larger retailers also use) should not be conflated with 'social retailers' (the small number of dedicated providers such as Nau Mai Rā and Toast Electric). Scaling needs to include support for communities to engage with or establish their own dedicated social retailers where distrust or historical trauma is a major barrier to mainstream retail relationships.
Q26. What are the main barriers to scaling social retailing, including access to hedges, prudential requirements, metering capability, funding, referral pathways and operational capability?	In addition to the wholesale, prudential and metering barriers the Authority has identified, CEN highlights capacity and capability as a core barrier. Social retailers such as Nau Mai Rā and Toast Electric succeed because they combine electricity supply with trusted local relationships. Scaling social retailing requires investment in the trusted local workforce, advisors and navigators, that makes this model work. We note also that a reliance on hedge contracts from gentailers is also a very vulnerable position to be in for current social retailers. There should be a much stronger platform for this service to be offered from.
Q27. What forms of support, if any, would be most effective in	Fund the 'trust layer': training and support for community-based advisors and navigators, delivered through the EWN's Training and Education pillar,

Question	CEN Response
expanding social retailing without crowding out existing providers or reducing incentives for mainstream retailers to support consumers in hardship?	alongside the wholesale and prudential settings already being tested through arrangements like Pool of Power and the Authority's prudential security consultation.
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?	CEN member organisations already informally perform third-party advocacy for clients seeking electricity access, alongside their core retrofit and healthy homes work. This is currently unfunded and uncounted as a distinct service, despite being a regular part of the practical support our members provide.
Q29. How do consumers find out about what onboarding opportunities are available to access standard post-pay plans?	Largely through informal referral via community organisations and budgeting services already connected to CEN members. Formalising this through the EWN's Triage and Referral Platform would make these pathways consistent and visible nationally, rather than dependent on which community organisation a household happens to already know.
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?	CEN does not hold data on this question.
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?	The Authority is right that this isn't currently tracked. CEN can attest anecdotally that this occurs regularly through community organisations, and agrees better data collection is needed.
Proposed outcomes and areas for improvement	
Q32. Do you agree with the proposed outcomes, and are there additional consumer outcomes the Authority should consider?	CEN agrees with the proposed outcomes and recommends adding one further outcome: that all consumers have access to a trusted, locally-delivered advice and referral service that connects them to the full range of access pathways available to them.
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?	CEN has no strong view on default retailer mechanisms such as Australia's National Energy Customer Framework. Our caution is that any imported supply-guarantee mechanism must sit alongside, not replace, investment in trusted local relationships. International default-retailer models address supply guarantee, but not hidden hardship or engagement barriers, which require a different kind of solution rooted in community trust.
Q34. Do you agree with the proposed areas for improvement, and are there additional areas the Authority should consider?	CEN agrees with the six proposed areas and recommends adding a seventh: building the capacity and capability of the trusted, locally-delivered advice and referral workforce, through the establishment of an Energy Wellbeing Network. This underpins progress across all six of the Authority's other proposed areas simultaneously, since visibility, mainstream pathways, prepay outcomes, social retailing and metering access all ultimately depend on someone trusted being present in the household to identify need and connect people to what already exists.

Question	CEN Response
Q35. Which areas should be prioritised for further work, and why?	CEN recommends prioritising improving visibility of barriers, and supporting social retailing and community-based models, since both depend directly on the coordinated capacity the EWN would provide, and progress in these areas will make faster progress possible in the remaining areas.
Q36. What practical steps, including any quick wins, could improve access and choice in the short term?	Formally fund and recognise the referral and advocacy work already being done informally by community organisations; support the national scale-up of the existing ERGANZ Triage Pilot (or EnergyMate type programme); and reverse the decline of the Eco Design Advisor service, which has shrunk to only six advisors nationwide across four regions despite high and growing need. These EDAs provide (or should) the function of coach or mentor to home assessors and advisors in each region.
Q37. What additional information, data and monitoring would help to improve understanding, practices and outcomes in relation to access and choice?	CEN recommends investment in the Energy Wellbeing Evaluation Consortium (EWEC), proposed as the EWN's Research and Evaluation pillar, to act as the shared national data backbone connecting hardship, access, and referral outcomes across government, retailers, networks and community providers.
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?	Formalise and fund community organisations, iwi and advocates in a referral and advocacy role, coordinated nationally through the EWN, rather than leaving this work to occur informally and inconsistently as it does today.
Q39. How could outcomes for consumers using prepay electricity be improved while preserving any benefits that consumers value?	Pair prepay with proactive local advisor contact for households showing repeated disconnection patterns. This addresses the underlying structural cause of high usage (a cold, inefficient home) alongside the product itself, rather than treating disconnection purely as a billing event.
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?	Social retailing and community-based models should be a substantial pillar of the future access system. The risk of relying on them too heavily (especially with regard to current retailers 'dumping' non profitable customers) lies specifically in doing so without investing in the underlying market structure (social retailers should be able to access favourable pricing) and in the community workforce, capacity that is currently thin, unevenly distributed, and unfunded.
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 noted in Q9-Q13, CEN supports bundling meter upgrades into the ***trusted*** retrofit visits already occurring under WKH, HHI and other programmes, rather than treating metering as a separate retailer-led process. The regional overlap between legacy meter prevalence and CEN's high-deprivation retrofit backlog suggests significant efficiency could be gained from coordinating these visits.
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?	This is CEN's central recommendation to this consultation. New Zealand needs an Energy Wellbeing Network (EWN): a nationally-coordinated, regionally and locally delivered system that brings together Energy Hardship/Healthy Homes and Community Energy into one connected system, rather than the fragmented, siloed landscape described throughout this issues paper. A core function of the EWN is a significant increase in the capacity and capability of the healthy homes and community energy education and advisor sector: training and supporting the assessors and advisors who work in communities, and the navigators who connect households to the right pathway, whether that is retrofit, social retailing, prepay, exceptional onboarding, or another form of support. This workforce must sit within high-

Question	CEN Response
	trust local people and organisations, the same community enterprises already doing this work today, often without funding, because they are the ones households already trust enough to let into their homes and their financial lives. The EWN's four pillars, Research and Evaluation, Training and Education, Strong Regional Networks, and a Triage and Referral Platform, map directly onto the gaps this issues paper identifies: better visibility of barriers, stronger mainstream and alternative pathways, and coordinated cross-agency response. Over the next 5-10 years, CEN's vision is an electricity market where access and choice constraints are identified early by a trusted local advisor already known to the household, and resolved through a coordinated national referral system, rather than a household having to navigate a fragmented landscape alone at the point of crisis. CEN has not taken a position on how the EWN should be funded as there needs to be some thought in the roles of industry and government in the provision of this service. Ideally there would be some sort of energy sector levy supported by Government agencies who are working directly on energy wellbeing issues (especially health, housing, energy efficiency and social services.

Concluding Statement

Access and choice in the electricity market cannot be fixed by product design or credit policy alone. The households most affected by the barriers this paper identifies are, in CEN's 25 years of experience, the same households who need a trusted person to help them navigate a complex system, whether that is choosing a retailer, upgrading a meter, or getting a home retrofitted so the electricity they can access actually keeps them warm. The Energy Wellbeing Network is how New Zealand builds and sustains that trusted layer at national scale. CEN looks forward to continuing to work with the Authority on this shared challenge.