7 August 2026

Electricity Authority
By email to: consumer.mobility@ea.govt.nz

Tēnā koe

Consultation - Improving Consumer Access and Choice

Public version – Confidential information has been redacted

Contact Energy welcomes the opportunity to submit on the Electricity Authority's Improving Consumer Access and Choice issues paper. Contact supports the Authority's focus on ensuring consumers can access electricity supply and participate meaningfully in the retail market.

In our view, it comes down to one key issue: customers who are unable to access post-pay energy services still need access to electricity. While we cannot quantify how many customers are being declined elsewhere, the continued growth in our prepay customer numbers indicates these customers are seeking alternative pathways into the market. As the only retailer currently accepting new prepay customers, Contact is seeing clear evidence of this demand. Ultimately, it is unsustainable for this burden to fall on one provider.

If no provider were accepting customers with a low credit score, there is a risk that around [ ] per month would be unable to find any power supply. We recommend that the Authority pause the current consultation and urgently implement an obligation to connect. We have proposed a code amendment as Attachment A. The amendment would:

- require all retailers to offer at least one electricity service to any customer, regardless of their credit rating;
- provide flexibility for this obligation to be met in a number of ways, including prepay, bonds, partnerships with other retailers, or government guarantees; and
- preserve retailers' ability to manage genuine credit, safety and operational risks.

The regulatory framework should establish a requirement that customers who meet reasonable technical, safety and operational requirements have a practical pathway to electricity supply, but allow the market flexibility to determine how best to deliver it. Rather than trying to define how the market should solve the problem, we encourage the Authority to focus its sights on the desired outcome: that is, ensuring that consumers who meet reasonable technical, safety and operational requirements have a practical pathway to supply.

We also encourage the Authority to give weight to issues outside retailers' direct control, including income adequacy, housing and tenancy settings, digital exclusion, health needs, family violence, and the role of government, iwi and community agencies.

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Contact would be very cautious about broad product mandates, including any requirement for prepay to replicate all post-pay innovation or time-varying pricing offers. Prescriptive requirements of this nature risk increasing cost and complexity across the market, which may have unintended consequences for product development, innovation and the availability of sustainable customer offerings over time. Similarly, any additional monitoring or reporting should be proportionate, targeted and designed to distinguish genuine consumer harm from ordinary product use, such as short prepay disconnections that reflect budgeting preferences or temporary pauses in consumption.

Overall, Contact supports an inclusive electricity market in which all consumers have a practical pathway to supply, can access suitable products in their own name, and can benefit from innovation where it is technically feasible, commercially sustainable and safe. Achieving that outcome will require a shared framework that preserves retailers' ability to manage genuine credit and operational risk, while ensuring government and community agencies provide the broader social, financial and housing support needed to address the underlying causes of access barriers.

Our responses to the consultation are at Attachment B.

Ngā Mihi

Helen Roberts
Senior Specialist Regulatory, Contact Energy

Attachment A: Request to amend the Electricity Industry Participation Code 2010 to introduce an ‘obligation to connect’

This form is to request:

☒ an amendment to an existing clause or clauses in the Electricity Industry Participation Code 2010 (Code)

☐ the removal of an existing clause or clauses in the Code

☐ a new clause or clauses in the Code

Please refer to the Code amendment request guidelines [insert link] when completing this form. The Guidelines contain more information about requesting a Code amendment and the Authority’s process when it receives a request.

Please complete all relevant sections of this form, with as much information as you can. The more information you include in your request, the better we will understand and be able to assess your request. If there is not enough room in this form, you can attach more pages.

Email completed forms to info@ea.govt.nz.

Proposer

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Section 1: Information to include for all requests

Complete this section for all Code amendment requests.

The proposal

1. Objective of the proposal What do you want the proposal to achieve? Provide supporting information on the problem or issue the proposal seeks to resolve	The objective of this proposal is to ensure that all residential consumers who meet reasonable technical, safety and operational requirements have a practical pathway to electricity supply, even where they do not meet a retailer's standard credit criteria. Contact's experience is that responsibility for serving customers who face credit-related access barriers is becoming concentrated among a small number of providers. The proposal is intended to set up a more sustainable way to serve customers with a low credit rating while preserving retailers' ability to manage genuine credit, safety and operational risks.
2. Category of request State whether you think the request is minor, medium or complex, and why (applying the criteria in the Guidelines). For minor requests, specify whether you think the nature of the amendment is technical and non-controversial.	We consider the proposal is medium complexity. The amendment would introduce a new obligation on retailers to identify and maintain at least one pathway to gain an electricity connection for consumers who do not meet standard credit criteria. The proposal is targeted and outcome-focused, it can be implemented through a range of mechanisms, including prepay, bonds or security, alternative payment arrangements, government or third-party support, partnerships with other retailers, or other reasonable pathways to supply.
3. Clause(s) to which the proposal relates If the proposal relates to existing Code clause(s), state the full clause reference/s here. If the proposal relates to a new clause, state where you think this would best fit in the Code.	Part 11A-Consumer Care, clause 11A.1 Schedule 11A.1, Clause 10
4. Description of the proposed amendment	**Amendment 1: clause 11A.1 Purpose of this Part**

Describe the Code amendments you are proposing (or attach a draft of the proposed Code amendment when submitting this form). Note: if you are providing draft wording of the proposed Code amendment, see the Code drafting manual for guidance.	**11A.1 Purpose of this Part** The purpose of this Part is to impose a set of minimum standards on retailers requiring them to: (a) adopt behaviours and processes that foster positive relationships with residential consumers; (b) support residential consumers in accessing and maintaining an affordable and constant electricity supply suitable for their needs; and (c) help minimise harm to residential consumers caused by insufficient access to electricity or by payment difficulties; and (d) provide time-varying pricing plans for consumption and injection.; and (e) support access to electricity supply by ensuring that residential consumers are not excluded from obtaining an electricity supply solely because of their credit circumstances. **Amendment 2: Schedule 11A.1, clause 10** ~~**10 Declining to enter into a contract**~~ ~~If a retailer decides not to enter into a prepay or post-pay contract with a residential consumer seeking such a contract, the retailer must provide the person with:~~ ~~(a) information about 1 or more electricity plan comparison platforms;~~ ~~(b) reasons for the retailer's decision; and~~ ~~(c) information, including hyperlinks to the websites and contact details, of 1 or more support agencies from which the residential consumer could seek assistance.~~ **Access to electricity supply and alternative supply pathways** (1) A retailer may decline to enter into a contract with a consumer for a particular product or offering, including on the basis of credit risk, provided that the retailer continues to comply with subclause (2). (2) A retailer that declines a residential consumer for a particular electricity product or offering must still ensure the consumer has a practical way to obtain a contract for supply, including where the decline is based on credit history, credit rating, or previous payment difficulties. (3) A retailer may determine the means by which it satisfies subclause (2), including through: (a) a prepay product; or

	(b) a requirement to provide a bond or other security; or (c) alternative payment arrangements; or (d) a guarantee or support arrangement provided by a government agency or third party; or (e) an arrangement under which another retailer supplies the consumer; or (f) any other reasonable mechanism that enables the consumer to obtain an electricity supply. (4) Any prices, terms, conditions, payment arrangements, security requirements, or credit limits applying to a pathway established under subclause (2) must be reasonably necessary to manage the retailer's risk and must not have the effect of unreasonably preventing access to electricity supply. (5) If a retailer declines to enter into a contract for a particular product or offering, the retailer must advise the consumer: (a) of the reason for the decline; and (b) of the pathway available under subclause (2); and (c) of the steps required to access that pathway. (6) Nothing in this clause limits a retailer's ability to disconnect or arrange the disconnection of a consumer's premises in accordance with this Code, including under Part 6 of these Consumer Care Obligations. (7) Subclause (2) does not apply where the retailer has reasonable grounds to believe that supplying the consumer would be unlawful or would create a material health and safety risk for the retailer's employees, contractors, agents, or the public. (8) A retailer's consumer care policy must describe: (a) the pathway or pathways established under subclause (2); and (b) the eligibility requirements, security requirements, and payment arrangements that apply to each pathway; and (c) how a consumer may apply for or access each pathway. (9) In this clause, pathway includes a product, service, arrangement, or process made available by a retailer or through arrangements with another person.
5. How the proposal supports the	**Competition:**

Authority's main objective Identify how your proposal would support the Authority's main objective of promoting competition in, reliable supply by, and/or efficient operation of the electricity industry for the long-term benefit of consumers. If the proposal is not expected to impact a limb of the main objective, use "No impact on this limb" See section 15(1) of the Act	The proposal supports competition by reducing the risk that consumers with adverse or limited credit history are effectively dependent on a single retailer or a very small number of access pathways. It would require responsibility for maintaining at least one practical pathway to supply to be shared more evenly across retailers, while preserving scope for retailers to compete and innovate in how they meet that outcome. The proposal does not require any retailer to offer a particular product, such as prepay, and therefore should not constrain product differentiation or competition. **Reliability:** No impact on this limb **Efficiency:** The proposal supports efficient operation by setting an outcome-based obligation rather than mandating a particular product or delivery model. Retailers would be able to choose the most efficient way to provide a pathway to supply. This should reduce the risk of inefficient and unsustainable concentration of higher-risk customers with one provider and avoid the cost and complexity of more prescriptive product mandates.
6. Application of the Authority's additional objective Identify whether your proposal relates to the dealings of industry participants with domestic consumers and small business consumers. If it does, identify how your proposal will protect the interests of domestic and small business consumers in relation to the supply of electricity to those consumers. See sections 15(2)-(3) of the Act	The proposal directly relates to the dealings of retailers with domestic consumers. Its purpose is to protect the interests of residential consumers who may otherwise be unable to obtain electricity supply in their own name because they do not meet standard credit criteria for a particular product or offering.
7. How the proposal complies with section 32 of the Act	The proposal promotes the matters in section 32(1)(a), (c) and (d) of the Act. It promotes competition by reducing the risk that particular consumer groups are effectively limited to one retailer or one product

The Code may only contain provisions which are necessary or desirable to promote specific matters listed in section 32(1) of the Act which are: a) competition in the electricity industry b) the reliable supply of electricity to consumers c) the efficient operation of the electricity industry d) the protection of the interests of domestic consumers and small business consumers in relation to the supply of electricity to those consumers e) the performance by the Authority of its functions f) any other matter specifically referred to in the Act as a matter for inclusion in the Code. Identify which of the section 32(1) matters listed in the adjacent column your proposal relates to.	pathway. It promotes efficient operation by using an outcome-focused obligation that allows retailers to choose the least-cost and most practical mechanism for meeting the access objective. Most importantly, it protects the interests of domestic consumers by reducing the risk that consumers are excluded from electricity supply because of their credit circumstances.
8. Affected parties Who is likely to be substantially affected by the proposal? Thei could include other participants (such as generators, distributors metering equipment providers, intermittent generation owners), consumers, market operation service providers.	The parties affected are retailers and residential consumers who face credit-related barriers to supply. Retailers would need to identify and maintain at least one pathway for affected consumers, which may require changes to customer onboarding, credit assessment, consumer care policies, staff guidance, system processes, partnerships or support arrangements. Consumers with adverse or limited credit history would be affected positively, because they would have greater assurance of a pathway to supply.
9. Urgency	Contact considers this request should be treated as urgent given the potential consequences for

Identify whether you consider your proposal to be urgent (providing supporting rationale). Section 40 of the Act	consumers if existing access pathways become unavailable. If existing access pathways become constrained or unavailable, a significant number of consumers could face difficulty obtaining electricity supply. It is therefore in the public interest for the Authority to address the gap promptly, rather than waiting for the issue to become more acute.
10. Support for the proposal Do you consider there is widespread support for your proposal among the people likely to be affected? If so, provide supporting rationale.	Contact expects there will be broad support for the outcome that residential consumers should have a practical pathway to electricity supply. However, affected parties may have different views on the best mechanism for achieving that outcome, particularly given the commercial, operational and credit-risk implications for retailers. The proposal seeks to address those concerns by being outcome-focused and flexible, rather than prescribing prepay or any other particular product. That flexibility should make the proposal more workable across different retailer business models.
11. Prior consultation Do you consider there has been adequate prior consultation on the proposal so that all relevant views have been considered? If so, provide supporting rationale.	The Authority is currently consulting on Improving Consumer Access and Choice, and the issues paper directly raises questions about credit-related access barriers, prepay, social retailing, exceptional onboarding, metering constraints and consumer outcomes. That consultation provides relevant context for this request. However, Contact does not consider that consultation on the specific Code amendment proposed here has yet occurred.
12. Other relevant information Is there any other relevant information you would like the Authority to consider?	Contact's proposed drafting is intended to preserve retailer flexibility and avoid an unintended product mandate. The key regulatory outcome should be that consumers who meet reasonable technical, safety and operational requirements are not left without a practical pathway to supply solely because of their credit circumstances.

Section 2: Standard Code amendment requests

This section should be completed for all standard Code amendment requests. A request will be treated as a standard Code amendment request unless the Authority is satisfied that one of the following applies:

- the nature of the amendment is technical and non-controversial (question 2)

- the proposed amendment should be made urgently (question 9)
- there is widespread support for the amendment among the people likely to be affected by it (question 10), or
- there has been adequate prior consultation so that all relevant views have been considered (question 11).

You do not need to complete this section of the form if any of these apply. However, if the Authority does not agree with your assessment and decides to treat the request as a standard Code amendment request, we may come back to you and ask you to complete this section.

Provide a summary of the costs and benefits in the table below. Benefits can be qualitative and/or quantitative.

Costs and benefits of the proposal

13. Costs of the proposal Identify the expected costs of the proposal, including: • your assessment of the direct cost to develop and implement the proposed Code amendment, and • the consequential costs as a result of the amendments.	The proposal would impose implementation costs on retailers and minor administrative costs on the Authority through the Code amendment process. Retailers would need to review and update onboarding processes, customer communications, consumer care policies, staff guidance and any systems or referral pathways used to identify and offer a practical pathway to supply. Some retailers may also incur costs to develop or maintain alternative supply pathways, such as prepay capability, payment arrangements, bond or security processes, partnerships with other retailers or support agencies, or other operational mechanisms. These costs are likely to vary depending on each retailer's existing systems, products and customer support arrangements.
14. Benefits of the proposal Identify the expected benefits of the proposal	The proposal would provide significant consumer and market benefits. It would reduce the risk that residential consumers with adverse or limited credit history are unable to obtain electricity supply. It would also reduce the risk that responsibility for serving higher-credit-risk customers becomes concentrated on a single retailer or a small number of access pathways. By taking an outcome-based approach, the proposal would preserve retailer flexibility and encourage different models for meeting the access objective, while avoiding the cost and complexity of a prescriptive product mandate.

15. Net benefit of the proposal State whether you consider the proposal has a positive net benefit, and why.	Contact considers the proposal has a positive net benefit. The expected costs are mainly implementation and administration costs for retailers, and those costs are moderated by the flexible, outcome-based design of the proposal. Retailers would not be required to provide any particular product, and could choose the most practical and cost-effective pathway for their business model. We expect that these costs are outweighed by the benefits of ensuring residential consumers have a practical pathway to electricity supply, reducing the risk of consumer harm, improving market-wide responsibility for higher-risk customers, and preserving sustainable access pathways such as prepay, social retailing, supported onboarding or other retailer-led arrangements.

Assessment of alternative options

	Alternative means of achieving proposal's objective ***(repeat column as necessary)***	
	Alternative 1	Alternative 2
16. Describe alternative option Include a brief description of any alternative means identified of achieving your objective	Status quo. Under this option, no new Code obligation would be introduced. Consumers who do not meet a retailer's standard credit criteria would continue to rely on existing market pathways, including prepay where available, social retailing where available, exceptional onboarding, support agency referrals, or voluntary retailer discretion. In practice, this would leave the burden of serving many higher-credit-risk consumers concentrated on the small number of retailers currently willing and able to provide those pathways, particularly Contact as the only retailer currently accepting new prepay customers.	Nominated provider(s) of last resort. Under this option, the Authority could run a competitive process to appoint one or more retailers or providers to act as a designated access provider for consumers who are unable to obtain standard post-pay supply. The successful provider would be selected through an auction or tender process and could receive funding in return for accepting referred customers and maintaining specified access-to-supply services.
17. Identify extent to which the alternative would achieve your objective	The status quo is not a sustainable model for ensuring that all customers have a pathway to gaining electricity supply. The current model depends heavily on one company continuing to accept and serve a disproportionate share of customers who may be declined elsewhere. If that pathway becomes unavailable or constrained, there is no market-wide backstop.	An auctioned provider of last resort could achieve the access objective to some extent. However, it would still centralise the access obligation in a designated provider, reducing customer choice and competition. Its effectiveness would depend heavily on the design of the tender, the level of funding, eligibility criteria, referral processes, and the capability and long-term sustainability of the appointed provider.

	Alternative means of achieving proposal's objective *(repeat column as necessary)*	
18. Affected parties Who is likely to be substantially affected by the alternative?	The parties most affected would be consumers with adverse or limited credit history, Contact and any other retailers currently providing alternative access pathways, social retailers, support agencies, and the Authority. Consumers would remain exposed to uncertainty if existing voluntary pathways narrowed.	The parties most affected would be the appointed provider or providers, retailers not appointed under the auction, consumers referred into the scheme, and the Authority.
19. Expected costs and benefits Please include direct costs to develop the alternative and consequential costs and benefits to all affected parties	The status quo would avoid immediate Code amendment and implementation costs for most retailers. However, those apparent savings are achieved by leaving the existing costs and risks concentrated on the few providers currently serving higher-risk customers. That concentration is not sustainable. It creates creates a material risk of consumer harm if the current pathway becomes constrained or unavailable. The main benefit is short-term simplicity, but that is outweighed by the lack of resilience and the absence of a market-wide access obligation.	This option would involve material design, procurement, governance and administration costs. It would also require ongoing public or industry funding to compensate the appointed provider for bad debt, higher customer support costs, and other risks. The benefit is that it could create a visible access pathway and may allow the role to be funded transparently. However, it risks creating a separate residual market for higher-risk consumers, reducing incentives for other retailers to develop their own access pathways, and making the appointed provider highly dependent on the adequacy of the auction funding and support arrangements.

	Alternative means of achieving proposal's objective *(repeat column as necessary)*	
20. Why do you prefer the proposal over this alternative?	Contact prefers the proposal because the status quo does not solve the problem and is not sustainable. A Code obligation would provide a clearer and more durable market-wide framework, while still allowing each retailer flexibility to determine how best to provide a practical pathway to supply.	Contact prefers the proposal because an provider of last resort model would be more complex, more interventionist and potentially less durable than an outcome-based obligation on all retailers. The proposed Code amendment better shares responsibility across the market, avoids creating a residual customer segment, and preserves flexibility for retailers to meet the access objective in different ways.

Attachment B: Submission form – Improving Consumer Access and Choice

Submitter: Contact Energy Ltd

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.

We agree that consumers with constrained access to electricity supply or limited retail choice can face a range of risks, including difficulties securing supply, reduced ability to switch retailers, reliance on a narrower set of alternatives, and limited access to emerging products and services.

However, it is important that these risks are carefully distinguished and appropriately characterised. For example, having fewer available options does not necessarily mean a consumer is unable to access electricity supply. Similarly, some consumers may prefer alternative arrangements, such as prepay products, because they provide greater certainty and control over household budgeting, reduced risk of accumulating unmanaged debt, and avoiding unexpected bills. For some consumers, these features make prepay a preferred product rather than simply an alternative when post-pay supply is unavailable

We therefore encourage the EA to clearly distinguish between situations where consumers are genuinely unable to obtain supply and those where access is affected by temporary or practical barriers, such as metering constraints or other operational issues.

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?

We expect evidence on these issues may come from a range of sources, including retailer onboarding and credit assessment data, declined applications, customer support interactions, and disconnection and reconnection patterns. These sources can all help build a clearer picture of the circumstances in which consumers face barriers to accessing services or retail choice.

We encourage the EA to exercise caution when interpreting headline disconnection numbers. Disconnection data does not necessarily indicate that a consumer was unable to obtain supply through another retailer or pathway. It also does not explain the circumstances that may have led to the disconnection or the outcome experienced by the consumer.

Similarly, we cannot assume that retailers are responsible for all disconnections. A prepay disconnection may occur for a variety of reasons, including consumer choice, budgeting preferences, temporary absence from a property, or delayed top-ups. Therefore, disconnection figures alone are likely not to provide a complete picture of consumer wellbeing or access.

Q3. Are there particular groups of consumers, regions, housing situations or metering circumstances where these risks are more likely to occur?

We agree that these risks are likely to be most present where multiple barriers overlap. Consumers may be more vulnerable where they face challenges such as adverse or limited credit histories, low incomes, unstable housing circumstances, limited digital access, language barriers, disability, medical dependency, experiences of domestic violence, or limited access to support services. Renters may also face additional constraints, particularly where they have limited control over metering or other aspects of their electricity connection.

Metering circumstances can also play an important role. Consumers with legacy or non-communicating meters may be unable to access products and services needing timely usage data, including prepay and time-of-use (ToU) plans. This can limit both retail choice and access to pricing options and services.

Q4. Do you agree that access and choice constraints may affect retail market performance? Please explain why or why not.

We agree that consumers benefit when they can compare offers, switch retailers, and access products that best suit them.

However, sustainable retailer participation is also a critical component of a well-functioning market. If regulation limits retailers’ ability to manage genuine credit, operational, or service risks, it could have unintended consequences, including reduced innovation, higher costs that are ultimately borne by other customers, or a reduced willingness to offer products designed to support higher-needs consumer groups.

Rather than imposing prescriptive requirements on how retailers should serve these customers, we consider the EA's role should be to ensure consumers who meet reasonable technical and operational requirements have access to electricity supply. The market should retain flexibility to determine how best to deliver that outcome.

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.

We acknowledge that access issues can arise where consumers do not meet retailers’ credit assessment criteria. However, we consider credit assessment to be a legitimate and necessary commercial practice that enables retailers to manage credit risk appropriately.

In our view, the focus should not be on whether retailers should be able to assess and manage credit risk, but rather on electricity access for consumers who do not meet the criteria for a particular product.

Q6. What factors influence whether a retailer accepts, declines or offers alternative arrangements to a consumer following a credit-risk assessment?

Metering arrangements may influence the options available to a consumer. For example, some products and services rely on communicating smart meters, meaning consumers with legacy or non-communicating meters may face practical limitations in accessing certain plans or alternative retail arrangements.

Additional considerations may also arise where a consumer is medically dependent on electricity or connected through an embedded network, as these circumstances can often affect both the suitability and availability of retail offerings.

More broadly, outcomes may vary depending on a retailer’s approach to supporting customers experiencing energy hardship or financial vulnerability, including the extent to which wellbeing considerations are incorporated into areas like onboarding and customer support processes. Other important factors are the retailer's risk appetite, the maturity of their hardship and wellbeing programmes, the level of investment they've made in supporting vulnerable customers their willingness and capability to work with higher-needs customer group.

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?

There is already a number of practices, safeguards and product offerings that are successfully enabling consumers with adverse or limited credit histories to access and maintain electricity supply. Prepay itself is an example of an existing mechanism that is already working well for many consumers. It continues to be an effective pathway to supply for many consumers who may not meet traditional post-pay credit criteria. It can help customers access electricity, avoid accumulating unmanaged debt, prevent bill shock, and maintain greater control over energy spending.

Another example of an existing support arrangement is Contact Energy’s The Good Initiative, a $5 million programme launched in 2025, expanded to $7.5m in 2026, to support customers and communities experiencing hardship. Through the initiative, Contact partners with social agencies and community organisations, covering costs such as electricity, broadband and mobile services so those organisations can focus their resources on supporting vulnerable New Zealanders. This sits alongside Contact’s customer wellbeing initiatives, including flexible payment arrangement and the continued provision of prepay, which offers customers another route to receive electricity supply. This combination of supports provides multiple ways for customers experiencing financial difficulty or other challenges to maintain access to electricity supply while receiving assistance that reflects their individual circumstances.

Previous initiatives such as ConnectMe (run by ERGANZ and the major retail energy providers, and trialled in 2023-2024) targeted residential consumers with adverse credit histories who would traditionally be declined a post-pay contract. While early outcomes appeared promising, scaling and sustaining these models can be challenging where ongoing funding, underwriting, and ownership responsibilities are not clearly established. This reinforces that access solutions need to be both effective for consumers and sustainable for the organisations responsible for delivering them.

The challenge overall is not a lack of safeguards, but whether they remain sustainable when responsibility becomes increasingly concentrated among a small number of providers. In Contact's case, we are currently the only retailer accepting new prepay customer sign-ups, resulting in a disproportionate concentration of customers who may be unable to access traditional post-pay products elsewhere.

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?

We are aware there can be unintended and potentially harmful consequences when consumers are unable to access electricity supply in their own name. In some circumstances, consumers may rely on another person to hold an electricity account on their behalf. This can create risks where the account holder is not the primary occupant or bill payer, and may reduce the consumer’s independence, autonomy, and visibility over their electricity services.

Examples include situations involving fraud, elder abuse, or family and domestic violence, where a consumer may be forcefully prevented from establishing an account in their own name and made to rely on another person’s account to maintain access to electricity. This can make it hard for affected individuals to manage their energy usage and payments, engage directly with retailers, or seek support services.

It is also worth noting that safety and network risks may arise when consumers are unable to obtain electricity supply in their own name. In some circumstances, consumers may seek to bypass normal connection processes, including unauthorised connections, meter tampering, or other unsafe workarounds to maintain access to electricity. These situations can create safety risks for occupants, communities and field staff, as well as increasing the risk of fraud and network losses. This reinforces the need to maintain a legitimate pathway to supply.

Q9. Do you agree that legacy and noncommunicating smart meters may be limiting some consumers’ access to electricity services, retail plans or retail competition? Please explain why or why not.

Contact agrees that legacy meters and non-communicating smart meters can limit some consumers' access to retail plans, electricity services, and competition, but notes that the issue is concentrated in a relatively small cohort of customers.

Customers without functioning smart meters may not be readily able to access a range of products and services such as ToU tariffs, support for solar export arrangements, load management and demand flexibility programmes and half-hourly consumption data that supports modern billing arrangements. Accordingly, they may miss out on these benefits.

It is important to note that the evidence does not show a strong correlation between the lack of smart meters and deprivation in many cases the lack of a smart meter is driven by practical installation barriers rather than deliberate exclusion from competition.

And while access to smart meter-enabled products and services can improve consumer choice and competition, the more fundamental question is whether consumers can access and maintain electricity supply. Smart meters enable a range of potential benefits (e.g. ToU pricing, solar export arrangements, demand flexibility programmes and more innovative retail offerings) but access to these products is not synonymous with addressing energy hardship or access concerns. Many customers experiencing financial hardship may not have the consumption profile needed to benefit from ToU plans, and few would be in a position to make the upfront investment required for solar generation or similar technologies. While these products can deliver value for some consumers, they are not necessarily the primary solution to affordability or access challenges.

Q10. What are the most prevalent barriers to upgrading legacy meters or restoring communication capability to non-communicating smart meters?

The main barriers are practical ones. They include site access constraints, customer or landlord control over meter access, poor cellular signal or difficult meter locations, ageing communications technology and network shutdowns, meter-type incompatibility, and uncertainty that a replacement meter will communicate once installed. These issues are compounded by the cost and operational complexity of serving a shrinking legacy-meter base, including manual reads, estimates, site visits, manual reconnections and remedial work. In some cases, particularly for renters or customers switching retailers, the retailer may also lack the practical ability to arrange or confirm an upgrade quickly. The result is that smart-meter capability is not always within Contact's control, and some premises remain difficult or uneconomic to upgrade.

In Contact's experience, key barriers are:

(i) **Access to the meter/site** — upgrades or communication fixes can be delayed where contractors cannot access the meter because it is inside, behind locked gates, affected by dogs/site hazards, or requires the customer to be home

(ii) **Customer / landlord consent and control issues** — renters may have limited ability to authorise a smart meter installation or remedial work.

(iii) **Physical or technical communication constraints** — smart meters may fail to communicate because of poor signal quality, meter placement, underground/inside locations, thick concrete or brick walls, or known weak network coverage. Contact's internal smart meter guidance says these issues often require a site visit.

(iv) **Meter type limitations / incompatibility** — not all smart meters support the services customers want. Contact's prepay guidance lists eligible meter types and notes that some communicating smart meters, some Metrix meter variants, WASN meters, and other configurations are not eligible for prepay or remote reconnection

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?

In practice, this can mean the customer remaining on a more limited product, being placed on a standard post-pay arrangement (if eligible), using prepay only if the meter supports it, or relying on manual/estimated reads while remedial work is investigated.

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?

Meter upgrade and communications costs are generally managed through the commercial arrangements between retailers, metering equipment providers and, where relevant, other service providers. In many cases the customer is not directly charged for a standard smart-meter installation or routine remedial work, but the cost is still real and is ultimately recovered through retailer and metering service costs. More complex cases can involve site visits, repeat access attempts, modem or aerial work, meter replacement, manual reads, estimates, rebilling or other operational workarounds. These costs can be material, particularly for a small and declining cohort of legacy or non-communicating meters.

Those costs will not usually prevent an individual consumer from accessing electricity services directly, because they are not typically asked to pay the full upgrade cost upfront. However, they can affect retail choice in practice.

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 likely sufficient for most standard smart-meter upgrades and routine communications issues, but they are less well suited to the remaining harder-to-upgrade premises. Those cases often involve practical barriers that no single party can resolve alone, such as landlord consent, customer consent, site safety, weak communications coverage, unsuitable meter locations or ageing communications technology.

There is therefore an opportunity to improve coordination between retailers, metering equipment providers, distributors, landlords and consumers. This could include clearer escalation pathways for difficult sites, better information-sharing on the reason an upgrade or communications fix has failed, agreed timeframes for repeat access attempts or technical assessment, and clearer responsibility for deciding whether a site is genuinely uneconomic or technically impracticable to upgrade.

We also see merit in considering whether tenancy settings should better support smart-meter access. For example, the Residential Tenancies Act contains a process for fibre broadband installations that limits when a landlord can decline installation. A similar model could be considered for smart meters, with appropriate modifications such as a cost cap or safeguards for unreasonable property impacts. This may help address cases where a tenant wants communicating smart meter but cannot authorise the work themselves.

Any new arrangements should be targeted and proportionate. The goal should not be to require uneconomic upgrades in every case, but to ensure that consumers are not left without access to suitable retail products just because responsibilities are fragmented or escalation pathways are unclear.

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? Contact has observed increasing demand from customers who are unable to access traditional post-pay products due to credit-related factors. As the only retailer currently accepting new prepay customer sign-ups at scale, Contact is increasingly supporting a disproportionate share of consumers who face barriers to accessing electricity supply through current market offerings.

Our experience suggests that credit assessments remain one of the primary drivers of access constraints, particularly for consumers with adverse credit histories, existing debt, or limited credit records. For many of these customers, the challenge is not access to electricity supply itself, but access to a product that appropriately balances customer needs and retailer risk.

Prepay continues to play an important role by providing a viable pathway to supply for customers who may not qualify for traditional post-pay products. More broadly, customer outcomes can vary depending on a retailer's risk appetite, product offerings, and the maturity of its hardship and wellbeing programmes.

In our view, the key issue is ensuring consumers have access to electricity supply, recognising that access to supply does not necessarily mean access to every product or pricing plan available in the market.

Q15. Are the three main alternative pathways — prepay, social retailing and exceptional onboarding — sufficient, suitable and sustainable?

Prepay, social retailing and exceptional onboarding all have a role to play, but none is a sustainable market-wide solution on its own. Prepay is effectively only available to new customers through Contact, social retailing remains geographically limited and dependent on provider capacity and funding, and exceptional onboarding should remain a discretionary tool for genuinely exceptional cases.

The more fundamental issue is that responsibility for consumers who cannot access standard post-pay arrangements is not currently shared across the sector. Instead, the obligations are increasingly concentrated among a small number of retailers willing to serve higher-risk customers. This is not sustainable and risks undermining the viability of existing pathways.

Scaling any one of these options would expose the same underlying challenges retailers already manage, including bad debt, non-payment risk, hardship support and the cost of serving higher-needs customers. What is needed is a broader market mechanism that ensures access to electricity supply is shared more equitably across retailers.

It is also important to distinguish between access to electricity supply and access to a specific product type. Exceptional onboarding should support individual circumstances, but it should not become a substitute for a broader, sustainable access-to-supply framework.

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?

The risk of limited access is likely to be concentrated where several barriers overlap, rather than in a single consumer group, region or network area. The consumers most affected are likely to be those with adverse or limited credit history who also face one or more practical constraints — for example, living in rental accommodation, having a legacy or non-communicating meter, lacking reliable digital access, being medically dependent, living in an embedded network, or needing support from a community or social agency.

We are not aware of evidence showing that these risks are confined to particular regions or network areas. However, regional or network-level issues can arise where there is weak communications coverage, a higher proportion of legacy meters, difficult housing stock, embedded networks, or limited availability of retailers willing to serve higher-credit-risk customers. There is also the case of customers who have elected to be fully remote or off grid, and know that their options are limited. Within that group there may be remote customers who would like to connect to the grid but where the cost to connect is not feasible (for example, they are at end of the line or there is no existing network infrastructure nearby).

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?

Prepay customers do not currently have the same range of options as standard post-pay customers. While prepay provides important budgeting and access benefits, its primary value proposition is access to supply, simplicity and control, rather than access to the full suite of retail innovations. It is not always well suited to more complex offers such as time-varying pricing, demand flexibility, free-hour products, managed load services or other emerging propositions.

Prepay relies on real-time or near-real-time balance management, accurate consumption information, automated disconnection and reconnection processes, suitable customer communications and a communicating smart meter with the right functionality. Not all meter types, configurations or communications arrangements can support prepay or more advanced services. Where interval data is delayed, incomplete or unreliable, it becomes difficult to support dynamic pricing or flexibility products in a way that is accurate, transparent and safe for customers.

There is also a cost and suitability question. If retailers are expected to provide all pricing innovations across all products, those costs ultimately need to be recovered somewhere. There is a risk that mandating parity of features across products could ultimately undermine the viability of prepay itself. Some innovations may also be less suitable for financially vulnerable customers, particularly where they involve complex pricing structures, variable outcomes, digital engagement or active usage management.

The objective should be to improve customer outcomes, not achieve full product parity between prepay and post-pay. Prepay customers should be able to access meaningful savings and support where practical, but this does not mean every post-pay feature should be replicated in a prepay environment. Contact's prepay product is priced at the same rate as our standard basic plan, and customers can access key affordability and wellbeing supports, including credits, discounts and other support mechanisms.

In our view, the priority should be to preserve prepay as a viable access and budgeting product, while encouraging innovation where it is practical, cost-effective and safe. The EA should focus on identifying savings opportunities that can be delivered without compromising prepay's core functionality, consumer protections or commercial sustainability.

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 provides an important access-to-supply pathway for consumers who cannot obtain standard post-pay electricity services. For many of these consumers, prepay is not simply a budgeting tool; it is the mechanism that enables them to access and maintain electricity supply. Its benefits include helping customers manage electricity costs in real time, avoid accumulating further debt, maintain greater control over household budgeting, and reduce the risk of unpaid debt escalating into broader financial consequences.

Prepay also enables retailers to balance access to an essential service with appropriate credit-risk management, allowing some consumers who may otherwise be excluded from the market to obtain supply. However, prepay should not be viewed as either the cause of energy hardship or the solution to energy hardship. It is one mechanism that can support access, budgeting and debt management, while the underlying drivers of hardship often sit outside the retail product itself.

Consumers should have a practical pathway to electricity supply, but there should be flexibility in how that outcome is delivered. Prepay is one example of how retailers can provide access, but the market should retain discretion to determine the most appropriate mechanisms for different customer groups rather than prescribing a single solution. While prepay is not appropriate for every consumer, reducing access to prepay would not address the underlying causes of energy hardship and could remove an important pathway for customers who may otherwise struggle to obtain supply.

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?

Contact agrees that there is currently limited choice and competition within the prepay market. Contact is currently the only retailer accepting new prepay customers, meaning consumers who need or prefer prepay have limited ability to compare providers, switch retailers, or access competing prepay propositions. However, we encourage caution about allowing the discussion to become overly focused on prepay itself.

The broader issue is not simply a lack of choice in prepay, but a lack of effective access and choice for some low-credit or higher-risk consumers across the retail market more generally. Prepay is one mechanism that can support access to supply for this cohort, but it is not the only possible solution. Different retailers may choose to meet these customers' needs in different ways, including through prepay, alternative onboarding approaches, tailored support programmes, social retailing models or other innovations. The barriers arise from the systems, safeguards and customer-support requirements needed to serve the current prepay cohort sustainably.

The focus should therefore be on ensuring consumers have a sustainable pathway to electricity supply, rather than prescribing a particular product. Contact supports the principle that consumers should be able to access electricity supply, but the market should retain flexibility in how that outcome is delivered. The "what" should be access to supply; the "how" should largely be left to retailers to determine.

In relation to barriers, many of the challenges identified are not unique to prepay. They are largely the same challenges retailers face when introducing any new product, service or innovation, including system development, customer support requirements, metering capability, data availability, regulatory obligations and commercial sustainability.

We would therefore be cautious about policy responses aimed at increasing prepay participation specifically. A more effective approach may be to focus on removing barriers to customer access and ensuring responsibility for serving higher-risk consumers is shared across the market, while allowing retailers discretion in how they meet those obligations. The key question should not be "how do we get more retailers offering prepay?", but "how do we ensure low-credit consumers have a sustainable pathway to electricity supply?". Prepay is one answer to that question, but it should not be viewed as the only one.

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?

Prepay disconnections can occur for a range of reasons and should not automatically be interpreted as evidence that a customer is unable to afford electricity. Some disconnections may reflect consumer choice, budgeting preferences, temporary absence from the property, delayed top-ups, or a decision to pause use for a short period.

However, repeated or extended disconnections may indicate affordability pressure or difficulty maintaining supply, particularly where they occur frequently, for long periods, or alongside other vulnerability indicators. The key issue is therefore not whether every prepay disconnection is harmful, but whether retailers and the EA can distinguish ordinary prepay usage patterns from cases where self-disconnection may signal consumer harm.

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?

Retailers may capture information such as disconnection frequency and duration, top-up behaviour, customer contact history, and vulnerability indicators to help identify customers who may be struggling to maintain supply.

We monitor customers who experience a high number of disconnections within a rolling three-month period, as well as customers who remain disconnected for extended periods through a five-day disconnection report. These reports can help identify customers who may require additional support or follow-up.

However, these indicators should be interpreted carefully, as repeated or extended disconnections do not necessarily indicate affordability pressure and may also reflect normal prepay behaviours such as temporary absence, delayed top-ups, or customer choice.

Q22. Are additional pathways, safeguards or protections needed to reduce the risk that medically dependent consumers are placed on, or remain on, prepay arrangements?

We consider that targeted safeguards for medically dependent consumers are already an important part of managing risk within prepay arrangements. Retailers should maintain appropriate identification, escalation and support processes for medically dependent consumers, but we do not currently see evidence that additional obligations or protections are required beyond ensuring the effective operation of existing safeguards.

Contact has targeted processes to reduce the risk that medically dependent consumers are placed on, or remain on, prepay arrangements. Medically dependent customers are strongly advised that prepay is not recommended because of the risk of self-disconnection, and post-pay is the preferred option. Where Contact already supplies the property and a medically dependent customer does not meet standard credit criteria, Contact can sign the customer up on post-pay rather than prepay. Contact also has exception processes for existing prepay customers who are identified as medically dependent, including moving them from prepay to post-pay where appropriate, and monitoring prepay debt reports to identify cases where medical dependency and stopped payments may require escalation.

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?

Duplicate of Q17 – please see response above.

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?

Rolled-in debt arrangements can provide a practical pathway for customers to maintain electricity supply, avoid collections activity, and repay debt in a structured and sustainable way. However, they need to be managed carefully, particularly for customers experiencing affordability pressure, vulnerability, or difficulty maintaining regular top-ups.

Contact implements rolled-in debt arrangements in consultation with the customer and with their agreement. Customers are made aware of how the arrangement works, how debt recovery will occur, and what proportion of each top-up will be allocated to outstanding debt. We can offer prepay with rolled-in debt where a customer has arrears, cannot pay those arrears in full, and the property is eligible for prepay. These cases are checked and approved by our Customer Wellbeing or Credit teams.

Debt-recovery settings are tailored to individual circumstances rather than applied as a one-size-fits-all approach. Contact generally recovers 10% of each top-up against the outstanding debt, with the balance available for ongoing electricity use, but settings can be reviewed and adjusted where appropriate. The objective is to balance debt repayment with maintaining ongoing access to electricity supply.

Contact actively monitors and reviews prepay debt recovery through debtor reports, disconnection reporting and exception processes. Where customers have repeated disconnections, stopped payments, medical dependency, or signs they are struggling to manage prepay, cases can be escalated for wellbeing support, debt review, rolled-in debt adjustments, or movement to post-pay where appropriate.

Contact also has a range of tools available to support customers, including rolled-in debt adjustments, general wellbeing support, referrals to support channels such as Work and Income, MoneyTalks or other community agencies, and, in some circumstances, partial or full debt forgiveness where this is considered the most appropriate outcome for the customer. In our view, the issue is not whether debt recovery can occur through prepay, but whether it is done transparently, with customer agreement, appropriate safeguards, active monitoring, and flexibility to respond when circumstances change. That is where the consumer protection focus should sit.

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?

Social retailing should remain a targeted, community-based and industry-led response, rather than becoming a large-scale access pathway. However, Contact would avoid characterising social retailing as inherently better suited to customers with more complex hardship or vulnerability needs. Our experience does not necessarily support the view that social retailing delivers better outcomes by design. In some cases, Contact's disconnection outcomes are stronger than those observed within social retailing models.

The distinction is therefore less about customer suitability and more about customer choice, delivery model, and the services offered alongside electricity supply. Social retailing can play an important role for consumers who value a community-based approach or who benefit from additional wraparound support, but it should not be viewed as the default or preferred solution for all customers experiencing hardship or access barriers.

Social retailing is unlikely to be sustainable if expected to carry a significantly larger share of access-to-supply issues. Scaling it nationally would likely expose many of the same commercial, operational, affordability and debt challenges faced by mainstream retailers today. While stronger government support for energy hardship is important, the bigger access-to-supply question is how responsibility for higher-risk consumers is shared across the market.

A more sustainable approach would be to establish a clear expectation that consumers should have a pathway to electricity supply, while allowing retailers flexibility in how they meet that outcome. This would help distribute risk and responsibility more evenly across the sector rather than concentrating it within a small number of retailers, products, or community providers.

Ultimately, the objective should not be to expand social retailing as the primary solution, but to ensure all retailers participating in the market contribute to providing access to supply for consumers who face barriers to standard post-pay services. This would improve sustainability, support competition, and reduce the risk of a small number of organisations carrying a disproportionate share of higher-needs customers.

Q26. What are the main barriers to scaling social retailing, including access to hedges, prudential requirements, metering capability, funding, referral pathways and operational capability?

Contact does not have specific knowledge of the operating models, cost structures or commercial arrangements of individual social retailers. However, at a general level, social retailing requires reliable metering, billing, customer management, hardship support, payment processing and disconnection/reconnection capability. These systems are costly to build and operate, particularly for providers serving customers with complex needs and lower ability to pay. Social retailers may also lack the necessary scale or credit standing to manage wholesale market exposure and prudential requirements.

Funding is another major constraint. Scaling social retailing materially would require coordinated support across industry, government and community organisations. Where support is provided to reduce supply costs, including hedge assistance or similar arrangements, there should be a clear expectation that this translates into lower costs for consumers. A reduced wholesale hedge cost does not necessarily deliver a lower retail tariff unless the benefit is passed through. Previous market experience, including Nau Mai Rā, indicates that hedge assistance alone may not be sufficient to ensure lower consumer prices.

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?

Partnerships with a social retailer could be one way to meet an obligation to connect, if a retailer believed that it was the best way to meet the needs of the consumers in question. Such partnerships would require an increase in the capability of social retailers. In our view, the more sustainable solution is to ensure that all retailers participate in providing access to supply, rather than growing a social retailing sector that may ultimately face the same structural challenges.

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?

Yes. In addition to the approaches outlined in the paper, retailers may use a range of discretionary onboarding arrangements based on individual customer circumstances, risk assessments, payment history, existing customer relationships, vulnerability considerations, or evidence of a customer's ability and willingness to maintain supply. These arrangements are often operational rather than formal programmes and may not be publicly advertised.

Examples may include:

- Existing customers moving between products (including transitions from prepay to post-pay).
- Manual credit reviews that consider a broader set of factors than credit-reporting data alone.
- Approval of customers following engagement with Customer Wellbeing teams or specialist credit teams.
- Tailored payment arrangements or debt-management plans agreed prior to onboarding.
- Retailer discretion applied where additional information, advocacy, or customer circumstances support an exception to standard onboarding criteria.

Contact's experience is that exceptional onboarding can be an important mechanism for supporting access to supply. However, it is inherently a discretionary and often low-volume process. For that reason, it is best viewed as a complementary pathway rather than a scalable market-wide solution for consumers who cannot access standard post-pay services. A broader access framework is likely to require participation from the wider market rather than relying on exceptional onboarding alone.

Q29. How do consumers find out about what onboarding opportunities are available to access standard post-pay plans?

Consumers usually find out about onboarding options through direct engagement with the retailer during the sign-up process. Where a customer does not meet standard credit criteria, Contact can discuss available alternatives such as prepay, payment arrangements, Customer Wellbeing support, or other exception pathways depending on the customer’s circumstances and whether the property is eligible.

Customers may also become aware of options through referrals from support agencies, community organisations, MoneyTalks, Work and Income, or other advocates.

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?

Benefit redirections are used as a payment-support mechanism where a customer is receiving a benefit and needs help managing ongoing electricity payments or arrears. Customers arrange redirections directly with Work and Income, and Contact can provide account information, transaction history, balances and payment amounts where the customer has authorised this. Our guidance also links redirections with ControlPay, so the redirected amount should be enough to cover expected usage and any agreed debt repayment.

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?

Contact does not currently track the number of customers who are onboarded specifically as a result of third-party advocacy or referrals. In practice, advocacy and referral pathways are often embedded within broader customer support, onboarding and wellbeing processes rather than being captured as a distinct reporting category.

In our experience, the primary benefit of advocacy and referral-based onboarding is that it provides additional context that may not be visible through a standard credit assessment. This can include a customer's current circumstances, support arrangements, ability to maintain payments, and any underlying factors contributing to previous credit challenges. The process can support better-informed decisions and help establish more sustainable supply arrangements from the outset.

Referral and advocacy pathways can also improve customer outcomes by connecting consumers to broader support services, including budgeting assistance, hardship support, income support and financial mentoring. Where successful, these approaches can help customers maintain supply and avoid future debt escalation.

However, there are limitations. These pathways are typically highly manual, relationship-based and resource intensive. They rely on individual conversations, case-by-case assessment, and coordination between retailers, advocates and support agencies. This can increase cost to serve, create inconsistency between providers, and make it difficult to scale as a market-wide solution.

While advocacy and referral pathways can be highly effective for individual customers, they are generally best viewed as a targeted intervention rather than a primary access mechanism. Long-term access-to-supply solutions should not rely solely on specialist teams, community advocates or manual intervention, as these approaches are inherently capacity constrained and may not be sustainable at scale.

Q32. Do you agree with the proposed outcomes, and are there additional consumer outcomes the Authority should consider?

Contact broadly agrees with the proposed outcomes, subject to three qualifications:

1. the outcomes should focus on ensuring consumers have a practical pathway to electricity supply, rather than simply maximising product choice;

2. the framework should preserve the sustainability and viability of existing access pathways, including prepay; and

3. any access-to-supply obligations should share responsibility across the market, rather than concentrating cost and risk on the small number of retailers currently supporting higher-needs customers.

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?

Rather than focusing on specific international mechanisms, which may not be at all appropriate for New Zealand, we consider that the more relevant international lesson is that consumers should have a practical pathway to electricity supply, while preserving flexibility in how that outcome is delivered. Rather than adopting a particular prepay, social retailing, hardship or disconnection model, New Zealand should ensure that responsibility for access to an essential service should not become concentrated in a small number of retailers, products or community providers.

Overall, the focus should be on the access outcome, rather than prescribing a particular product, retailer model or support mechanism. A sustainable framework should ensure consumers have a pathway to supply, preserve retailer sustainability, share responsibility across the market, and allow retailers discretion over how access is delivered.

Q34. Do you agree with the proposed areas for improvement, and are there additional areas the Authority should consider?

Contact broadly agrees with the proposed areas for improvement. The issues identified by the Authority (credit-related access barriers, limited alternative pathways, prepay sustainability, metering constraints, vulnerability safeguards, social retailing, and better information) are the right areas to examine. However, we consider the Authority should frame the work as an access-to-supply issue, not simply a prepay or retail product issue. Prepay is a legitimate and valuable access and budgeting product, but it should not be expected to solve all access barriers. Social retailing and exceptional onboarding also have a role to play, but they are targeted or discretionary pathways and are not a full substitute for mainstream access.

We consider the Authority should also give greater weight to issues that sit outside retailers' direct control, including income adequacy, housing and tenancy settings, digital exclusion, metering access, medically dependent consumer pathways, and the role of government and community agencies. These matters are critical to consumer access but cannot be solved by retailer obligations alone.

Q35. Which areas should be prioritised for further work, and why?

Contact considers the Authority's priority should be establishing whether New Zealand needs a clearer obligation-to-connect or access-to-supply framework, and if so, what principles should underpin it. This should be the central workstream, with other issues considered through that lens:

1. The framework should focus on ensuring consumers who meet reasonable technical, safety and operational requirements have a practical pathway to electricity supply.

2. It should preserve sustainable access pathways, rather than elevating or protecting any specific product. Prepay is one mechanism through which access can be delivered, but it should not be prioritised above other potential market solutions.
3. The Authority should avoid prescribing detailed delivery models, referral processes or product requirements. A prescriptive framework could introduce cost, reduce retailers' ability to respond flexibly, and stifle innovation by binding the market to a defined process.
4. Further work on metering should focus on the practical barriers that prevent installation or restoration of communicating smart meters, particularly where consumers are unwilling to upgrade or landlords are unwilling to enable or fund necessary work. Retailers and metering equipment providers already have strong working relationships, but installation can be constrained by consumer concerns, site access, tenancy arrangements and landlord decision-making.

Q36. What practical steps, including any quick wins, could improve access and choice in the short term?

Contact would encourage the Authority to prioritise work on the access framework itself, including whether an obligation-to-connect or similar mechanism is required, rather than focusing too much on surrounding processes and support pathways. Access-to-supply is the core issue and merits prioritisation over referral pathways, guidance documents and process improvements.

Q37. What additional information, data and monitoring would help to improve understanding, practices and outcomes in relation to access and choice?

In Contact's view, there is already sufficient awareness and evidence in the sector that some consumers have limited access pathways, and that risk is concentrated amongst a small number of products and providers. Some of the suggested data points (e.g. prepay usage, disconnections, top-up behaviour and vulnerability indicators) can be very difficult to interpret in isolation, creating a risk of drawing incorrect conclusions. Again, we would urge the Authority to focus on progressing policy development rather than undertaking new monitoring exercises.

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?

Contact considers the most important change would be a clearer access-to-supply framework, including consideration of whether an obligation-to-connect model or similar mechanism is required to ensure consumers have a practical pathway to electricity supply. The focus should not be on requiring retailers to offer a particular product or onboarding approach, but on ensuring there is a consistent pathway to supply somewhere within the marketRetailers should continue to have the ability to manage legitimate credit, operational and safety risks. There is an inherent tension between expanding access and managing credit risk. If retailers are expected to accept materially higher levels of risk to increase access, there should be discussion about whether government is prepared to provide affordability support, guarantees, or debt-underwriting mechanisms to help share that risk.

Q39. How could outcomes for consumers using prepay electricity be improved while preserving any benefits that consumers value?

No comment

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?

Please refer to our previous comments on social retailing in several sections above.

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?

Retailers already have strong incentives to support communicating smart meters, because they enable lower-cost service, more accurate billing, remote reads, faster switching, prepay, time-varying pricing, better customer usage information and future flexibility services. Contact supports the continued transition to communicating smart meters and agrees that metering capability is increasingly important for access, choice and innovation.

The residual problem is not primarily a lack of retailer incentive. The harder cases often involve practical barriers outside a retailer's direct control, including site access, landlord consent, customer availability, weak communications coverage, unsuitable meter locations, older communications technology, meter-type incompatibility and uncertainty about whether remediation will succeed. These cases can be costly and complex to address.

We are not aware of clear evidence that particular regions or consumer groups are systematically disadvantaged by current metering arrangements, but disproportionate impacts can arise where several barriers overlap (e.g. renters who cannot authorise meter work, consumers in housing with difficult meter access or poor communications coverage, and customers in embedded networks).

Q42. What opportunities are there for stronger crossagency, 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?

There are significant opportunities for stronger cross-agency, community and partnership-based responses to improve electricity access and choice. Many of the barriers consumers face are not solely retail market issues. They often reflect wider challenges relating to income adequacy, housing quality and tenancy settings, digital inclusion, health needs, credit history, family violence, financial capability and access to trusted support services.

A well-functioning and inclusive electricity market over the next 5–10 years should ensure that all consumers have a practical pathway to supply, while preserving retailer ability to manage genuine credit and operational risk. Consumers should be able to access electricity in their own name, understand the options available to them, move between suitable products where appropriate, and benefit from smart-meter enabled innovation where it is technically feasible and safe.

The future market should not rely on one pathway, such as prepay or social retailing, to solve access issues. Instead, it should include a mix of mainstream post-pay access, viable prepay services, targeted social retailing, clear hardship and referral pathways, better metering capability, and stronger government/community support for consumers with more complex needs.