

SEANZ Submission

Improving Consumer Access and Choice

Electricity Authority issues paper – 30 June 2026

Submitter

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Overall submission

SEANZ supports the Electricity Authority’s focus on ensuring that all consumers can access electricity supply and exercise meaningful choice. We agree that credit barriers and metering constraints can exclude consumers from competition and can compound energy hardship.

However, SEANZ considers the issues paper frames “access and choice” too narrowly if it is confined principally to access to a retailer and a retail tariff. The electricity system is becoming increasingly decentralised and consumer participation will include rooftop solar, batteries, electric vehicles, flexible demand, peer-to-peer and community energy arrangements, aggregation and other distributed energy resource (DER) services. Meaningful choice must therefore include the ability of consumers — including renters, lower-income households and consumers with poor credit histories — to participate in and share the benefits of that transition.

SEANZ strongly agrees with the Authority’s concern that the future market should not evolve so that consumers with the greatest financial resilience capture the greatest benefits from innovation and flexibility while vulnerable consumers are excluded. In our view, this principle should become a central design test for future retail, metering, data and flexibility-market reforms.

SEANZ recommends that the Authority broaden the next stage of this work to include: universal access to communicating metering and usable consumption data; access to time-varying pricing and flexibility services; pathways for renters and low-income consumers to benefit from distributed generation and storage; enabling community energy and peer-to-peer models; and ensuring that market arrangements allow DER and aggregated flexibility to compete on a fair basis with conventional network and generation investment.

Appendix A – Submission form

Risks, impacts and market performance

Question	SEANZ comments
Q1. Do you agree with the risks identified for consumers who may have constrained access to electricity supply or limited retail choice?	Yes. SEANZ agrees with the identified risks. Electricity is an essential service and inability to secure supply, switch retailer or access an appropriate product can increase costs and disconnection risk. We would add a further risk: consumers who cannot access communicating metering, suitable tariffs, data or distributed energy services can be structurally excluded from the growing value available from solar, batteries, EVs and demand flexibility.
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?	SEANZ does not hold better quantitative evidence than that presented in the issues paper. The Authority's data nevertheless indicates the issue is material, including 46,895 recorded credit-related refusals in 2025. We encourage the Authority to track consumer outcomes after a refusal, rather than only the number of refusal events.
Q3. Are there particular groups of consumers, regions, housing situations or metering circumstances where these risks are more likely to occur?	Yes. The risks are likely to be greater for renters, lower-income households, consumers with limited or adverse credit histories, consumers in areas with legacy or non-communicating meters, and households where property or landlord constraints prevent upgrades. Rural and remote locations with weaker telecommunications coverage may also be disproportionately affected.
Q4. Do you agree that access and choice constraints may affect retail market performance?	Yes. Consumers who cannot switch, respond to price signals or access new products weaken competitive pressure and reduce the pool of demand-side flexibility available to the system. As DER grows, exclusion also risks creating a two-tier market: active consumers able to reduce bills and earn value from flexibility, and passive consumers left carrying a greater share of system costs.

Credit history and access to post-pay electricity

Question	SEANZ comments
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?	Yes. Credit-risk assessment is commercially legitimate, but electricity is an essential service and credit assessment should not result in a practical inability to obtain supply. Risk-management measures should be proportionate and should not unnecessarily prevent consumers accessing products that could lower their bills.
Q6. What factors influence whether a retailer accepts, declines or offers alternative arrangements following a credit-risk assessment?	Factors include credit history, expected payment risk, existing debt, retailer risk appetite, cost-to-serve, metering capability, availability of prepay or supported arrangements, and the ability to establish payment plans or guarantees. SEANZ supports greater transparency and consistency around alternative pathways following a failed credit assessment.
Q7. Are there existing practices, safeguards or support arrangements working well for consumers with adverse or limited credit history?	Tailored payment plans, early engagement, advocacy/referral pathways, social retailing and exceptional onboarding can help. However, these should complement rather than replace a robust mainstream pathway to supply.
Q8. Are you aware of unintended behaviours or consequences when consumers cannot access electricity supply in their own name?	The issues paper identifies use of another person's account or identity following refusal. Other consequences can include reduced independence, informal debt arrangements and avoidance of switching. SEANZ supports better outcome tracking to establish scale.

Metering capability and access to services

Question	SEANZ comments
Q9. Do legacy and non-communicating smart meters limit access to services, retail plans or competition?	Yes. A communicating smart meter is increasingly a gateway not simply to billing but to time-of-use tariffs, prepay, dynamic pricing, flexibility, DER optimisation and future market participation. Metering capability should therefore be regarded as core enabling infrastructure.
Q10. What are the most prevalent barriers to upgrading legacy meters or restoring communication?	The paper correctly identifies site wiring, physical access, landlord consent, telecommunications coverage, health and safety constraints and upgrade cost. SEANZ would add fragmented responsibility and incentives between retailer, MEP, distributor, landlord and consumer, which can leave no party responsible for resolving a difficult site.
Q11. What happens when a communicating smart meter is required but an upgrade is delayed, declined or cannot be arranged?	The consumer can become trapped in a circular process: a product requires a communicating meter, but arranging the meter may depend on already having a retailer. This is unacceptable where it prevents practical access to supply. A defined escalation and upgrade pathway is needed.
Q12. How are upgrade/remedial/communication costs managed, and can they prevent access or choice?	Costs vary and may be absorbed by a retailer or passed to the consumer, while remedial electrical work may fall to the property owner/consumer. Where a meter upgrade is necessary for basic access or meaningful market participation, inability to pay should not become a permanent exclusion mechanism. Targeted support should be available for genuinely uneconomic or hardship cases.
Q13. Are existing arrangements sufficient for harder-to-upgrade premises?	No. For the residual hard-to-upgrade sites, clearer responsibilities, service standards and escalation processes are warranted. Coordination should include retailers, MEPs, distributors, landlords/property owners and telecommunications providers where communications are the constraint.

Constrained access can affect health, wellbeing and participation

Question	SEANZ comments
Q14. Do you have further evidence on consumers affected and what happens after a consumer is declined or cannot access a suitable service?	SEANZ has no additional quantified evidence to add. We support the Authority collecting longitudinal data on what happens after refusal or failed onboarding, including time to secure supply, eventual retailer/product, meter status and whether the consumer relies on another person or an advocate.

Alternative access pathways

Question	SEANZ comments
Q15. Are prepay, social retailing and exceptional onboarding sufficient, suitable and sustainable?	Not on their own. These pathways are valuable but are too narrow to be the principal solution. The objective should be a mainstream, sustainable route to electricity supply, with prepay and social retailing available where they suit consumer circumstances rather than functioning as a default destination for consumers rejected elsewhere.
Q16. Are there groups, regions or metering circumstances with limited or no practical pathway to supply?	Yes. Consumers facing both poor credit and a legacy/non-communicating meter are particularly exposed. Regional disparities in smart-meter penetration and telecommunications coverage can compound the problem.

Prepay electricity

Question	SEANZ comments
Q17. Do prepay customers have sufficient access to pricing innovation and savings opportunities?	No. Prepay consumers appear to have materially less access to time-varying pricing, flexibility, free-power periods and emerging products. This matters increasingly as value shifts from a simple cents/kWh tariff toward when electricity is consumed, generated, stored or exported.
Q18. What role is prepay playing for consumers unable to access standard post-pay, and what benefits does it provide?	Prepay provides an important pathway without conventional credit assessment and can help consumers manage expenditure and avoid accumulating debt. It should remain available where chosen and suitable, but should not become a second-class retail market.
Q19. Is there effective choice and competition in the prepay market, and what are the main barriers?	Current effective choice appears weak, particularly while only one provider is widely accepting new prepay customers. Barriers include operational cost, customer-support requirements, metering dependency, technology platforms, scale and commercial risk.
Q20. To what extent do prepay disconnections reflect choice/budgeting versus inability to top up?	Both occur. Short disconnections can be consistent with deliberate budgeting or temporary absence, but repeated or extended disconnections may indicate hardship. The Authority should distinguish these circumstances rather than treating all prepay disconnections as equivalent.
Q21. What information could identify when repeated or longer prepay disconnections indicate affordability pressure?	Retailers should monitor frequency and duration of disconnection, time of day, repeated emergency-credit use, top-up patterns, failed payments, reconnection delay and contact with hardship teams. Data should be used to trigger support rather than punitive action.
Q22. Are additional safeguards needed for medically dependent consumers on prepay?	Yes. Medically dependent consumers should have strong safeguards against being placed on unsuitable prepay arrangements, supported by clear identification, escalation and transition to an appropriate post-pay or guaranteed-supply arrangement.
Q23. Do prepay customers have reduced access to innovation, competition and cost-reduction opportunities?	Yes. The technical capability of a smart meter should be used to broaden rather than restrict consumer options. Regulatory and market settings should encourage prepay offerings that can support TOU pricing, demand response, DER and other flexibility services.
Q24. Does use of prepay to recover prior debt create additional risks?	Potentially. Debt recovery through prepay can reduce the amount available for current essential consumption. Settings must be transparent, affordable and adjustable where recovery creates hardship, with clear limits and consumer support.

Social retailing

Question	SEANZ comments
Q25. Should social retailing remain targeted or become a more substantial national pathway?	Social retailing should remain an important targeted and community-linked model, and there may be value in scaling it. But it should not become the mechanism by which mainstream retailers collectively externalise responsibility for higher-risk consumers.
Q26. What are the main barriers to scaling social retailing?	The paper identifies the principal barriers: hedging, prudential requirements, metering, funding, referral pathways and operational scale. SEANZ particularly notes that access to competitive hedging and wholesale arrangements can be difficult for small and innovative retailers and can inhibit new business models.
Q27. What support would expand social retailing without crowding out providers or mainstream retailer responsibility?	Support should focus on lowering structural entry barriers, improving access to hedging and shared services, enabling efficient referral pathways, and supporting community partnerships. Assistance should be designed so mainstream retailers retain strong incentives and obligations to serve consumers in hardship.

Exceptional onboarding

Question	SEANZ comments
Q28. Are there other examples of exceptional onboarding beyond those outlined?	SEANZ has no additional examples to provide.
Q29. How do consumers find out about onboarding opportunities?	Information is fragmented. A single, clearly publicised pathway should explain available alternatives and support. A consumer declined by a retailer should not have to discover the next option unaided.
Q30. How are benefit redirections used, and are consumers declined if unable or unwilling to redirect?	SEANZ has no additional evidence on the scale of benefit redirection. Any such arrangement should be voluntary, transparent and proportionate; inability or unwillingness to redirect a benefit should not automatically leave a consumer without a practical route to supply.
Q31. How many consumers are offered contracts after third-party advocacy/referrals, and what are the benefits, risks and limitations?	SEANZ does not hold data on numbers. Third-party advocacy can be effective but is inherently difficult to scale and can create unequal outcomes depending on whether a consumer knows how to access an advocate.

Proposed outcomes and areas for improvement

Question	SEANZ comments
Q32. Do you agree with the proposed outcomes, and are there additional outcomes?	Yes, but SEANZ recommends an additional outcome: all consumers should have a reasonable opportunity to participate in and benefit from the decentralised electricity system, including time-varying pricing, distributed generation, batteries, EV charging, demand flexibility, aggregation and community energy. Access should not mean merely being connected to a retailer.
Q33. What international approaches to ensuring access could suit New Zealand?	The Australian default retailer/default market offer framework identified in the paper merits further examination as a guaranteed-access backstop. SEANZ also encourages examination of overseas community energy, shared solar and peer-to-peer models that allow consumers who cannot install their own generation — particularly renters — to access distributed-energy benefits.
Q34. Do you agree with the proposed areas for improvement, and are there additional areas?	Broadly yes. SEANZ recommends adding a seventh area: “enabling equitable participation in distributed energy and flexibility”. This should cover DER access, data portability, aggregation, community energy, peer-to-peer arrangements, renters and low-income participation, and removal of unnecessary barriers to consumer-led energy services.
Q35. Which areas should be prioritised for further work, and why?	SEANZ would prioritise: (1) universal practical access to communicating metering; (2) a guaranteed mainstream pathway to electricity supply; (3) access to usable data and time-varying/flexibility products; and (4) market settings that allow all consumers to participate in DER and community energy. Metering and data are foundational because they enable many of the other choices.
Q36. What practical steps or quick wins could improve access and choice in the short term?	Quick wins include a standard referral pathway after a credit decline; transparent publication of alternative onboarding options; a defined escalation process for meter upgrades; reporting on outcomes after refusal; accelerated replacement of legacy meters in high-incidence regions; and requiring consumers with suitable meters to have access to at least one meaningful time-varying tariff. The Authority should also progress practical frameworks for community energy and aggregation.
Q37. What additional data and monitoring would improve understanding, practices and outcomes?	Track unique consumers, not only refusal events; repeat refusals; time until supply is secured; meter capability; regional location; eventual

	product; prepay disconnection duration/frequency; access to TOU/flexibility products; and whether consumers can participate in DER or community energy. Data should be capable of identifying persistent exclusion without creating unnecessary privacy risk.
Q38. What changes could increase access to mainstream post-pay services, and what roles should other agencies play?	A guaranteed last-resort/default pathway should be investigated alongside consistent alternative onboarding and early hardship support. Government and community agencies can support payment guarantees, referrals and targeted assistance, but the core retail market should remain responsible for providing workable access.
Q39. How could outcomes for prepay consumers be improved while preserving valued benefits?	Preserve the budgeting and debt-avoidance benefits valued by some consumers, while improving product competition, access to TOU/flexibility, hardship triggers, protections for medically dependent consumers and clear pathways from prepay to post-pay.
Q40. What role should social retailing and community-based models play, and what are the risks of relying on them too heavily?	Community-based models can build trust, target support and develop innovative local solutions. They should be enabled to participate in shared solar, batteries, aggregation and community energy as well as retail supply. The risk of over-reliance is creation of a separate market for vulnerable consumers while mainstream competition serves only lower-risk customers.
Q41. Are current incentives to install communicating smart meters appropriate, and who is disproportionately affected?	Current incentives have delivered high national smart-meter penetration, but the residual problem is concentrated and may not be solved by commercial incentives alone. Where a communicating meter is necessary for meaningful retail and flexibility participation, there should be a clear pathway and, where justified, targeted support to complete upgrades in difficult regions and premises.
Q42. What opportunities exist for stronger cross-agency/community responses, and what should an inclusive market look like in 5–10 years?	A well-functioning market in 5–10 years should give every consumer a practical pathway to supply, a communicating meter and access to their data; enable switching and time-varying pricing; and allow households to consume, generate, store, export and trade electricity or provide flexibility directly or through an aggregator/community model. Cross-agency work should connect electricity policy with housing, hardship and finance, while the Authority ensures retail, metering, data and flexibility rules do not create a two-tier electricity transition.

SEANZ concluding position

SEANZ supports further work by the Authority. The central opportunity is to ensure that consumer protection and consumer participation are treated as two sides of the same issue. New Zealand should not build a future electricity market in which access to the lowest-cost and most flexible energy options depends on home ownership, strong credit, capital availability or a particular meter. The next phase should therefore address both the immediate barriers identified in this paper and the structural settings needed for equitable participation in distributed energy.