Appendix A Submission form

Improving Consumer Access and Choice

Submitter	Peanut Butter Collective

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

Cover note

The Peanut Butter Collective (PBC) is a mission-led membership organisation being built to help New Zealand households get onto, and stay on, an electricity plan that suits them. We intend to act as an authorised agent for our members: with their authority, obtaining their consumption information and comparing plans across the market on their behalf. We are pre-launch and do not yet have members. We are not an electricity retailer and are not a participant under the Electricity Industry Participation Code.

We are responding to three questions where we have direct, if early, evidence or a specific perspective to add. We have not answered the others, where others are better placed.

Our interest in this consultation is narrow and specific: households that cannot obtain usable consumption data are, in practice, unable to have their plan options compared accurately. That is a form of constrained choice the paper touches on but does not fully draw out, and it is the point we want to put on the record.

We recognise the paper is primarily focused on households facing hardship — those declined on credit grounds, those relying on prepay, those in rentals or moving often. We have no direct evidence on those pathways and have not answered the questions covering them. Our contribution sits under the second and third of the Authority's three headings, better information and smarter choices. We would add only that the households least able to obtain and act on their own consumption data are very often the same households the rest of the paper is about, so the two sets of barriers are not as separate as answering them separately might suggest.

Disclosure. PBC is developing a household electricity comparison service and is in commercial discussions with electricity retailers, including some whose published pricing is analysed in this submission. No retailer is named here, and no retailer has seen or influenced this submission. The analysis rests entirely on retailer and distributor pricing that is already published, so none of the claims depends on naming anyone.

Questions	Comments
Risks, impacts and market performance	
Q1. Do you agree with the risks identified for consumers who may have constrained access to electricity supply or limited retail choice? Please explain why or why not.	
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?	
Q3. Are there particular groups of consumers, regions, housing situations or metering circumstances where these risks are more likely to occur?	
Q4. Do you agree that access and choice constraints may affect retail market performance? Please explain why or why not.	
Credit history and access to post-pay electricity	
Q5. Do you agree that consumer credit history or retailer credit-risk assessments may be limiting some consumers' access to electricity services or retail plans? Please explain why or why not.	
Q6. What factors influence whether a retailer accepts, declines or offers alternative arrangements to a consumer following a credit-risk assessment?	
Q7. Are there any existing practices, safeguards or support arrangements that are working well to help consumers with adverse or limited credit history access electricity supply?	
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?	
Metering capability and access to services	
Q9. Do you agree that legacy and non-communicating smart meters may be limiting some consumers' access to electricity services, retail plans or retail competition? Please explain why or why not.	Yes, and we would add a mechanism the paper does not fully draw out. The paper frames the problem mainly as *some plans require a communicating meter*. There is a second effect that reaches further. Without a communicating smart meter there is no half-hourly consumption data; without that data, no plan can be compared accurately, not only the plans that require the meter. The error is not evenly spread across plan types. A simple flat tariff can be estimated reasonably well from

	annual consumption. Time-of-use, free-hour and controlled-load plans cannot be assessed at all without knowing *when* a household uses power. So a household without a communicating meter is excluded twice over: once from the products that require the meter, and again from being able to tell whether any of the newer, potentially cheaper plans would leave them better off. This compounds with the circular barrier the paper itself describes at paragraphs 4.42 to 4.43. Where a switch may prompt a retailer to commission a meter upgrade, the household without a communicating meter has weak grounds to switch in the first place, because it cannot see whether a switch would pay. No data, no confident reason to move; no move, no upgrade triggered; no upgrade, still no data. The households caught in this loop are disproportionately the ones the rest of the paper is about — a household declined on credit grounds, in a rental, or moving frequently is also the household least likely to have the data needed to tell whether a better plan exists. Geography compounds it. The Authority's own Figure 1 puts legacy meters at their highest in Waitaki, the West Coast, Northland and Gisborne, and paragraph 4.34 notes that non-communicating meters often reflect cellular black spots. Rural and isolated households are therefore over-represented among those with no usable consumption data — and in several of those same areas Figure 2 shows only one retailer widely accepting customers who do not meet standard credit criteria. This speaks

	to the fifth of the Authority's areas for improvement, improving access to suitable metering. We do not suggest households should be advised to switch simply to obtain a meter. That would be a switch made without the data needed to know it is worthwhile, and in some networks it could carry other costs. Our point is that the circularity is a feature of the current arrangements, not a failing of the household, and it is worth the Authority's attention as such. There is one further limit worth putting on the record, because it bears on what a meter upgrade can be expected to deliver once a household has one. We compared the published residential peak windows of five retailers offering time-of-use pricing against the published residential peak windows of the 25 distributors that publish one. **Four of the five match no distributor's window exactly**, and the fifth matches about a third of those where the comparison is exact. Mean divergence runs from **0.4 to 2.9 hours per weekday**, and it runs in both directions: hours a distributor prices as peak that the retail plan does not, and hours the retail plan prices as peak that the distributor does not. One retailer's evening peak ends at 21:30, a boundary that appears in no distributor's published schedule anywhere in the country. This is not a criticism of any retailer's design, and it does not divide along gentailer and independent lines — two retailers on opposite sides of that divide share one clock, and two

	others share another. The two sets of windows are answering different questions. A retail time-of-use window is built around wholesale and hedging exposure, which is national; a network peak window is built around the local constraints of one network. Divergence is the expected outcome of that, not an anomaly, and it follows that no amount of retailer good intent closes the gap on its own — it is the arithmetic consequence of national retail windows applied across 25 differently shaped networks. The consequence for this consultation is narrow but real. A household given a communicating meter and moved onto a time-of-use plan responds to its retailer's window, which may not be its network's. Load shifted out of the retail peak is not necessarily load shifted out of the network peak. So the benefit of improving metering access should not be assumed to flow through in full, and for the household the saving available from shifting load is harder to predict than a plan's headline structure suggests. **A communicating meter opens the door to these products. It does not, on its own, deliver the household's saving — nor the system benefit that justifies time-varying pricing in the first place: load moved off the peak a network has to build for, and the investment every consumer on that network ultimately pays for.** The limits are worth stating. We looked at five retailers, which is not the market. The comparison is exact for the 15 networks that publish a single year-round peak window, and indicative only for the seasonal ones,

	because our method treats a network's windows as running concurrently and so overstates the gap there. The figures describe households on a network's time-of-use price category, not everyone connected to that network. And we have taken each retailer's windows to apply nationally because that is how they publish them, with no per-network qualifier, rather than because anyone has confirmed it to us.
Q10. What are the most prevalent barriers to upgrading legacy meters or restoring communication capability to non-communicating smart meters?	
Q11. What typically happens when a consumer needs a communicating smart meter to access a particular retail product or service, but an upgrade is delayed, declined, not technically straightforward, or cannot be arranged because the consumer does not have a retailer willing to serve them?	
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?	
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?	
Constrained access can affect health, wellbeing and participation	
Q14. Do you have any further information or evidence on the number and characteristics of consumers affected by access and choice constraints, the circumstances in which these constraints arise, and what happens after a consumer is declined or cannot access a suitable retail service?	We can offer a small, early observation from our own work, offered with its limits stated plainly. As part of building our service we asked a set of households to request their own half-hourly consumption data from their retailer and provide it to us. We built our import process to the Authority's own published specification for conveying this

	information, **EIEP13A, titled "Electricity conveyed information for consumers"**, and to validate each file against it. Of the 14 files we received, **not one conformed to that specification**. Every one required a manual cleaning or transformation step before it could be read. None arrived in a form a household, or a third party acting for them, could use directly. Of those 14, only two were obtained by self-service download; the remaining twelve could be obtained only by contacting customer support. We think this is the sharper point. The specification for delivering this data to consumers already exists, and it is the Authority's own. Yet the files households actually receive when they exercise their right to their own data do not meet it. The standard is in place; the consumer's experience of it is not. The variation between households on the same retailer is as telling as the averages. Two households with the same retailer had opposite experiences: one received usable data at the first request; the other, despite a long career in technology and knowing to ask specifically for half-hourly data by its protocol name, has still not obtained it after being sent two incorrect summary files. The characteristic worth drawing out is who these households were. They were engaged volunteers, technically literate, and motivated to complete the task. They are close to a best case. If obtaining usable consumption data is this uneven for the households best equipped to do it, the experience for a typical

	household, and especially one already facing hardship or low confidence, is very likely worse. Limits of this evidence, stated honestly: the sample is small and self-selected, and it is weighted to one region. But "non-conforming" here is measured against the Authority's own published EIEP13A specification, not against a standard of our own choosing, so it is not simply a matter of our software's preferences. We offer this not as a measurement but as a signal, and as a reason to gather the real measurement, which is the subject of our answer to Q37. **A second observation, on a different part of the same problem: a plan name no longer reliably identifies the terms.** Comparison depends on knowing which plan a household actually holds. We have found at least one case where the name does not settle it. A retailer's current published terms carry **two live vintages of the same named plan**: households that joined the plan before a certain cut-off date receive a materially better entitlement than those who joined after. The plan name is identical for both. A household cannot tell from its bill or its plan name which version it holds. Nor can a comparison service working from the plan name alone, which will therefore compute the wrong answer for one of the two groups — potentially showing a household a saving measured against terms it does not have, or failing to warn it that leaving forfeits

	an entitlement it cannot get back if it returns. We want to be clear that we do not raise this as misconduct, and we do not think it is. Honouring the original terms for existing customers is the right thing to do, and publishing both versions openly is more transparent than migrating everyone quietly. We have seen the same protective pattern at a second retailer, and in both cases it works in favour of longer-standing households. The problem is not the practice. It is that the market has no reliable way to express the difference, so the household with the better deal is the one most exposed to losing it by accident. This becomes more pressing shortly. From 30 October 2026, retailers must tell each customer annually whether a better plan is available to them with that retailer. The retailer is much the best placed party to do this well, because it holds the vintage information the household does not. The question is what that comparison is required to cover. A household on an older vintage could be shown a plan that is cheaper on its headline rates while giving up an entitlement it cannot recover. We suggest the assessment should account for the value of anything forfeited by moving, not only the rates gained. The obvious response to all of this is that a comparison service should work from a plan identifier rather than a plan name, and we agree. The Authority's work on unique plan identifiers, which already contemplates legacy plans that remain active, is the natural place for

	this to be resolved, and we support it. Two things limit how far it goes on its own. First, an identifier disambiguates only if the two vintages are actually issued different identifiers; published under a single identifier, the ambiguity survives in a new form. Second, and more fundamentally, the household is not a comparison service. It holds a bill, and the bill shows a name. Any process that depends on a household correctly reporting which version of a plan it is on will fail for precisely the group that cannot tell.
Alternative access pathways	
Q15. Are the three main alternative pathways — prepay, social retailing and exceptional onboarding — sufficient, suitable and sustainable?	
Q16. Are there consumer groups, regions, network areas or metering circumstances where consumers currently face limited or no practical pathway to access retail electricity supply? If so, which consumers are most affected and what do they do?	
Prepay electricity	
Q17. Do prepay customers have sufficient access to pricing innovation and savings opportunities, including time-varying pricing, demand flexibility, free-hour offers or other emerging retail products? If not, what are the main barriers to making these options available to prepay customers?	
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?	
Q19. Is there effective choice and competition in the prepay market, and what are the main operational, commercial, technological or regulatory barriers to offering prepay services?	
Q20. To what extent do prepay disconnections reflect consumer choice, budgeting preferences or temporary pauses in use, compared with	

circumstances where consumers are unable to top up?	
Q21. What information are retailers capturing that could help identify when repeated or longer prepay disconnections may indicate affordability pressure, difficulty maintaining supply, or other consumer impacts?	
Q22. Are additional pathways, safeguards or protections needed to reduce the risk that medically dependent consumers are placed on, or remain on, prepay arrangements?	
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?	
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?	
Social retailing	
Q25. Should social retailing remain a targeted community-based, industry-led response, or should it become a more substantial national access pathway for consumers who face barriers to standard post-pay electricity?	
Q26. What are the main barriers to scaling social retailing, including access to hedges, prudential requirements, metering capability, funding, referral pathways and operational capability?	
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?	
Exceptional onboarding	
Q28. Are there any other examples of exceptional onboarding for consumers with adverse or limited	

credit history onto standard post-pay plans, beyond the approaches outlined in this paper?	
Q29. How do consumers find out about what onboarding opportunities are available to access standard post-pay plans?	
Q30. How are benefit redirections being used to support access to electricity supply, and are consumers being declined supply if they are unable or unwilling to redirect their benefit?	
Q31. How many consumers with adverse or limited credit history are being offered contracts by retailers after third-party advocacy or referrals, and what are the benefits, risks and limitations of this approach?	
Proposed outcomes and areas for improvement	
Q32. Do you agree with the proposed outcomes, and are there additional consumer outcomes the Authority should consider?	
Q33. What international examples of approaches to ensuring electricity access for all consumers do you believe would be appropriate for the New Zealand context and why?	
Q34. Do you agree with the proposed areas for improvement, and are there additional areas the Authority should consider?	
Q35. Which areas should be prioritised for further work, and why?	
Q36. What practical steps, including any quick wins, could improve access and choice in the short term?	
Q37. What additional information, data and monitoring would help to improve understanding, practices and outcomes in relation to access and choice?	We suggest one addition that is small, proportionate and within the existing monitoring framework. Retailer response *times* to consumer data requests are already measured and published. What is not measured is whether the consumer actually receives **usable** data. A retailer can respond within the required time with a file that is not what was asked for, or not in a usable form, and still appear compliant on every published measure. Both of the outcomes

	described in our answer to Q14 would be recorded as met. We recommend the retail market monitoring extend from the clock to the outcome: alongside response time, capture whether the consumer received their consumption data in the requested form and at the requested granularity. This is the same distinction the Authority itself draws at paragraph 4.30, where it notes that current monitoring records the number of credit-related refusals but not the individual consumers affected. The gap on consumer data access is the same shape, in a different dataset. This matters for access and choice because the third-party tools and advisors that help consumers compare plans depend entirely on that consumer channel working. If it does not, the benefit of the Authority's wider data-access work does not reach the household, and the measures that would show the problem are not currently being collected. This speaks to the first of the Authority's areas for improvement, improving visibility of barriers to access and choice: a barrier nobody measures is a barrier that stays hard to see.
Q38. What changes could support increased access to mainstream post-pay electricity services, and what role could retailers, government agencies, iwi and other support agencies play?	
Q39. How could outcomes for consumers using prepay electricity be improved while preserving any benefits that consumers value?	
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?	
Q41. Are current incentives for retailers to install communicating smart meters appropriate, and are particular regions, consumer groups or housing situations disproportionately affected by current metering arrangements?	
Q42. What opportunities are there for stronger cross-agency, community or partnership-based responses to improve electricity access and choice, and what should a well-functioning and inclusive electricity market look like over the next 5–10 years?	