EXPRESSION OF INTEREST

NOVEMBER 2026

Electricity Innovation Sandbox

Help shape the future of the electricity sector

ELECTRICITY AUTHORITY
TE MANA HIKO

Executive summary

The Electricity Authority is launching a regulatory sandbox

The Electricity Authority Te Mana Hiko (Authority) is establishing the Electricity Innovation Sandbox, a regulatory sandbox (Sandbox) to test different electricity products and services that could increase consumer choice, support greater participation, encourage innovation, enable flexibility and strengthen competition in the electricity market.

As technologies such as rooftop solar, batteries and electric vehicles become more common, new opportunities are emerging for consumers to buy, generate, store, share and manage electricity. However, current market rules may make these new consumer opportunities difficult to access.

These technologies could support a more reliable and affordable electricity system that strengthens system security, enables flexibility and supports network efficiency. The Authority is committed to maintaining responsive regulatory settings that removes barriers to competition and innovation.

To inform future regulatory decisions, the Authority seeks evidence to understand whether new approaches can deliver these outcomes, the costs and benefits of doing so, and whether current regulatory settings are inhibiting innovation.

The Sandbox will build evidence to inform regulatory decisions

The Sandbox will enable innovative energy services and market arrangements to be tested in a real-world environment under carefully managed conditions. Sandbox trials will generate evidence on the costs, benefits and risks of different approaches, as well as broader system impacts and implementation challenges. They will also help to assess consumer demand for these services and other market arrangements.

This evidence will inform future policy and regulatory decisions on how best to support consumer participation, innovation and competition in New Zealand's evolving electricity system. This includes considering potential reforms such as multiple trading relationships (MTRs) and alternative approaches that could deliver similar outcomes.

What we want to learn through the Sandbox

The Authority is using the Sandbox to understand:

- consumer demand for innovative electricity products and services
- the costs, benefits and risks of different approaches
- operational and implementation challenges
- the potential impacts on consumers and market participants, and
- the regulatory and market conditions needed to deliver net consumer benefits.

All evidence and information generated as part of the Sandbox will be made publicly available for the benefit of the wider sector.

Where and when will the Sandbox operate?

The Sandbox will operate for a minimum of 18 months in the Queenstown Lakes and Central Otago districts from **1 July 2027 to 31 December 2028**.

We are seeking expressions of interest for Sandbox trials

The Authority is currently seeking expressions of interest (EOIs) to conduct Sandbox trials in the Queenstown Lakes and Central Otago that:

- test MTRs use cases, with or without additional regulatory reforms
- achieve similar consumer outcomes through other market arrangements.

Who should apply and why?

We encourage interested parties to develop EOIs collaboratively between market participants, technology developers, flexibility service providers, community groups and other relevant organisations.

Selected participants will be able to test products, services and market arrangements with customers in a real-world environment. Trials can help participants demonstrate consumer value, better understand demand and operational impact, reduce implementation risks and contribute evidence that may inform future policy and regulatory decisions.

We will publish on our website market participants who express an interest in conducting Sandbox trials to support the Authority in gathering evidence to inform future decisions.

How to apply

Entering the Sandbox will follow a multi-stage approach: an initial EOI phase followed by a detailed trial design phase (which may include applying for regulatory exemptions).

There will be two rounds for parties to express their interest. This will allow for staggered entry into the Sandbox. Information on eligibility, proposal requirements, assessment criteria and the application process are provided in this document.

Expression of Interest phase

To express interest in conducting a Sandbox trial, complete the EOI form on the Authority's website by the applicable deadline.

- **Round 1** - EOI responses received by **28 February 2027** will be assessed for Sandbox entry on or before 1 July 2027.
- **Round 2** - EOI responses received between 1 March and **28 May 2027** will be assessed for entry on or before 1 October 2027.

Detailed trial design phase

Participants who are selected following the EOI stage enter into agreements with the Authority to develop and collaborate on a detailed Sandbox trial design, including any regulatory exemption requirements.

This staged process will help ensure any trials within the Sandbox generate the evidence base to inform future regulatory decisions without imposing undue costs on trial participants.

If sufficient detailed design information is provided to the Authority early in the application process (eg, at the EOI stage), and there is an interest from trial participants, Sandbox trials may be permitted to begin before the proposed 1 July 2027 start date.

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1. Challenge: Ensuring regulation does not inhibit innovation

Consumer interest in new types of electricity services is growing

1.1 With increasing uptake of distributed energy resources, consumers are becoming aware of potential opportunities to access benefits through buying, generating, storing and sharing electricity in different ways.

1.2 Examples of these opportunities include the potential for electricity products and services like peer-to-peer trading, virtual power plants, community energy sharing initiatives and separate consumption tariffs for flexible loads such as hot water or electric vehicles.

1.3 Through initiatives such as the Power Innovation Pathway (Pathway),[1] the Authority is aware that parts of the sector continue to be interested in new types of electricity products and services which are currently hard to develop within existing regulatory settings.

1.4 Since launching in September 2024, the Pathway has received over 140 applications and around 25% of all Pathway engagements have proposed concepts or initiatives which rely on the availability of these types of products in the market.

The Authority wants to enable flexibility, increase choice and encourage competition, but gaining real-world evidence is difficult

1.5 As the electricity market regulator, we want to promote market development by ensuring the regulatory environment is not a barrier to innovation and that new technologies and services can be readily accessed to enable electrification and deliver better consumer outcomes.

1.6 There are different arrangements that could support consumer interest in new electricity products and services. One potential example is multiple trading relationships (MTRs), a market arrangement that would allow consumers to engage with multiple electricity providers at a single connection point.

1.7 The Authority's MTRs consultation in February 2026 showed stakeholders broadly support the policy objectives, but some had concerns about its complexity and implementation costs.

1.8 Given the significance of the proposed changes and with the existing evidence gaps, the Authority has decided that further work is needed to inform decisions on whether to enable MTRs, and if so, how it should be implemented.

[1] The Power Innovation Pathway is the Authority's 'open front door' to provide regulatory guidance to energy innovators and new entrants to accelerate bringing new products and services to market. More information is available here: Power Innovation Pathway | Electricity Authority

2. Proposed approach: Sandbox to inform decision making

A regulatory sandbox can gather evidence to inform future regulatory decisions

2.1 The Authority is seeking clear information from market participants, innovators and other interested parties on the costs and benefits of MTRs to enable an informed decision on any regulatory reforms.

2.2 This includes whether MTRs is the best proposal to support consumer choice or if an alternative regulatory approach is more suitable.

2.3 We consider a regulatory sandbox (Sandbox) is the most efficient and timely way to test and understand the outcomes of certain regulatory settings before deciding whether or not to make system-wide changes.

2.4 A Sandbox is a set of regulatory tools which together enable innovators and market participants to test innovative products, services, and/or business models, using real-world data and customers, within a controlled but flexible regulatory environment.[2]

2.5 A Sandbox will:

(a) enable multiple participants to conduct a range of trials to test various MTRs use cases and alternative approaches, while enabling net consumer benefits and demand to be assessed

(b) allow the Authority to provide participants with regulatory guidance on trial design and the exemptions which will be required to enable that trial to go ahead

(c) generate evidence to inform future decisions on whether and how regulatory reform should be enabled in New Zealand (whether that is MTRs or an alternative reform)

(d) improve the efficiency of conducting innovation trials for both participants and the Authority due to the direct support the Authority can provide to identify trial exemptions and process all proposed sandbox exemptions together.

2.6 Most importantly, the Sandbox approach will ensure the Authority meets its statutory objectives by enabling informed decisions on potential regulatory reforms, such that the Authority continues to promote competition in, reliable supply by, and the efficient operation of the electricity industry for the long-term benefit of consumers

Objectives of the Sandbox

2.7 The primary objective of the Sandbox is to generate real-world evidence to help the Authority determine whether MTRs, or alternative market arrangements, would deliver net consumer benefits compared with the status quo.

2.8 Net consumer benefits, in the context of the Sandbox, is defined as a situation where the benefits to consumers and the electricity system resulting from a product, service, market arrangement or regulatory change exceed the associated costs, risks and adverse impacts.

(a) Benefits may include lower electricity costs, increased consumer choice, greater market participation, improved competition, increased flexibility and broader system efficiencies.

[2] Within the New Zealand context, the concept of regulatory sandboxes has been of recent interest with the Ministry for Regulation publishing guidance to support Ministers and agency leaders to establish and manage regulatory sandboxes. Regulatory Sandboxes: Adapting your regulatory system in a safe-to-try way | Ministry for Regulation

(b) Costs may include increased participant implementation and/or operational costs, market risks such as cross-subsidisation (where costs are imposed or allocated elsewhere) and any other unintended consequences.

2.9 Specifically, the Sandbox aims to:

(a) assess whether MTRs or alternative arrangements deliver net consumer benefits

(b) understand the costs, risks and implementation challenges associated with new market arrangements before making decisions about broader regulatory reform

(c) determine the conditions required for success of MTRs, including what Code changes, market process changes or other regulatory reforms may be needed

(d) test whether equivalent consumer outcomes can be achieved without MTRs reform, and if alternative approaches could deliver similar benefits at lower cost or complexity

(e) build a robust evidence base for future policy decisions, including data on costs, benefits, consumer demand, and system-wide impacts

(f) identify areas of future investigation or evidence gathering.

2.10 Detailed objectives of the Sandbox are provided in Appendix A.

Potential outcomes of the Sandbox

2.11 Following the completion of the Sandbox, the trial outcomes will be compared against a counterfactual to evaluate whether the trials:

(a) delivered net consumer benefits through channels such as enhanced choice, bill savings, greater participation in the electricity market and behaviour change leading to system benefits, or

(b) did not deliver net consumer benefits due to unintended consequences, increased costs or risks imposed on consumers, participants or the wider electricity system.

2.12 Alongside other sources of evidence (eg, retail monitoring data and consumer surveys), the evidence gathered through the Sandbox trials may support:

(a) **implementation of MTRs reforms**;

(b) **implementation of alternative regulatory reforms**; or

(c) **no regulatory reform at all**.

2.13 Importantly, as noted above, the establishment of the Sandbox does not imply future regulatory approval or permanent regulatory change.

2.14 All evidence generated as part of the Sandbox (including any data produced through consumer surveys) will be made publicly available (noting that personal or commercially sensitive information will be anonymised or redacted where appropriate).

3. Opportunity: Conduct Sandbox trials to inform policy

3.1 The Authority is seeking expressions of interest from parties to conduct Sandbox trials that

(a) test MTRs use cases, with or without additional regulatory reforms

(b) achieve similar consumer outcomes through alternative market arrangements.

3.2 We expect that interested parties will include:

(a) market participants including electricity retailers, distributors and metering equipment providers

(b) non-participants including:

(i) energy innovators, technology companies, aggregators and flexibility service providers

(ii) consumer advocates and community energy organisations

(iii) renewable energy developers, commercial and industrial energy users and engaged residential consumers.

Why take part in the Sandbox?

3.3 The Authority wants to gain real-world evidence to inform future regulatory decisions, but it cannot run trials itself. Trials in a regulatory sandbox require willing market participants.

3.4 Participating in the Sandbox offers organisations an opportunity to work alongside the Authority to directly inform future regulatory decisions.

3.5 Participation benefits may include:

a) **The ability to test innovative ideas**: Trial products and services in a controlled environment before wider deployment.

b) **Create consumer value:** Demonstrate innovative ideas to the wider sector and test consumer demand in a real-world setting.

c) **Work through challenges before potential regulatory change:** An opportunity to test and quantify operational issues before wider implementation, as well as the potential to test internal biases.

d) **Work with the Authority to help shape future regulatory decisions**: Work closely with Authority staff throughout the trial design and implementation process.

e) **Inform future regulation**: Help shape future regulatory arrangements through practical experience and evidence.

3.6 We will publish on our website market participants who express an interest in conducting Sandbox trials to support the Authority in gathering evidence to inform future decisions.

4. Expression of Interest

4.1 If your organisation is interested in participating in the Electricity Innovation Sandbox, we encourage you to complete the Expression of Interest (EOI) form on our website.

4.2 The terms associated with the EOI are also provided on the Authority website.

4.3 Any expression of interest to enter the Sandbox to conduct a trial will need to be prepared collaboratively with any relevant or affected market participants (including retailers, distributors and metering equipment providers)

4.4 This is because market participants:

(a) are subject to the Code,

(b) are able to provide electricity services to consumers,

(c) interact with electricity market systems (such as the registry), and

(d) are able to receive regulatory exemptions from the Code in order to trial MTRs.

4.5 Expressions of interest should be submitted jointly by all parties required to deliver the proposed Sandbox trial.

4.6 In special cases, where a respondent(s) has demonstrated strong consumer demand for a service but, despite best intentions, has gained no interest from other market participants to offer the proposed service in the Sandbox, the Authority will consider how best to enable these respondents (including non-participants at the time of application) to facilitate trials as part of the Sandbox environment.

4.7 Any questions about the EOI should be directed to:

Jono Barnard
Power Innovation Pathway Manager
Email: innovate@ea.govt.nz.

4.8 Note that, when responding to queries, the Authority will publish responses to any queries that could be helpful to others potentially interested in responding to the EOI.

We want to identify suitable participants to conduct Sandbox trials

4.9 This EOI is intended to identify potential Sandbox trials and suitable participants to enter the Sandbox.

4.10 At this stage, respondents are not expected to have fully developed trial methodologies, implementation plans, exemption applications or final trial designs.

4.11 Detailed trial design will be undertaken collaboratively between the Authority and selected participants during Stage 2 of the Sandbox entry process (see section 6).

Respondents need to provide sufficient information to the Authority

4.12 Despite not needing information that is fully formed, the EOI form in on the Authority website requires prospective respondents to provide some information regarding their proposed Sandbox trial.

4.13 This includes:

(a) noting all parties involved in the trial, including key individuals and their contact details

(b) the proposed trial including its scope and design considerations

(c) the expected benefits and costs associated with the trial

(d) a detailed outline of the plan for gathering and providing required information to assess trial outcomes, the potential trial risks and the approach to managing them

(e) examples of the specific data that the proposed trial will be able to provide

(f) the primary interest for involvement with the Sandbox, and

(g) any other additional information, such as any preliminary market research (including consumer demand) and funding arrangements.

4.14 Respondents should provide sufficient information for the Authority to assess the proposed trial concept and its suitability for the Sandbox. Supporting evidence should be provided where available.

The Authority will assess all expressions of interest received

4.15 The Authority will assess each EOI response against a common set of criteria to determine whether the proposed trial is suitable for inclusion in the Sandbox.

4.16 Please consider these criteria when formulating your expression of interest response.

4.17 The assessment criteria, where relevant, includes:

a) **Alignment with Sandbox objectives:** The extent to which the proposed trial helps test and evaluate potential MTRs or alternative arrangements and provides insights, including costs and benefits, relevant to future policy development.

b) **Alignment with the Authority's objectives:** The extent to which the proposed trial helps test and evaluate potential market arrangements which link to the Authority's statutory objectives and strategic priorities, and has the potential to deliver on our strategic outcomes.

c) **Risk management and consumer protection considerations:** Whether appropriate arrangements are in place to manage operational, customer, market, and security risks during the trial**.**

d) **Applicant data and evaluation capability:** The applicant's ability to collect, analyse, and report information that will enable the Authority to evaluate trial outcomes and lessons learned.

e) **Regulatory learning value:** The extent to which the trial(s) would help identify regulatory, operational, technical, or market barriers to broad implementation of MTRs.

f) **Trial feasibility and applicant readiness:** Whether the applicant(s) has demonstrated a credible plan, appropriate capabilities, and sufficient stakeholder engagement to successfully deliver the trial(s).

g) **Policy relevance and scalability:** The degree to which the proposed trial reflects products, services, or market arrangements that could reasonably emerge if future regulatory reforms were implemented.

4.18 The Authority may also consider the overall balance and diversity of trials within the Sandbox to ensure a broad range of use cases, participants, and learning opportunities are represented.

5. How will the Sandbox work?

The Sandbox design supports safe and effective operation of trials

5.1 The Sandbox has been designed using key features which will allow approved participants to undertake trials in a controlled environment to inform future regulatory decisions.

5.2 Key features include:

a) **Support from the Authority to Sandbox participants:** As a first step, the Authority will work with approved participants to finalise trial designs and help apply for regulatory exemptions to undertake the trial. The Authority and approved participants will enter an agreement to govern the basis on which the Authority will provide this support.

b) **Obtaining regulatory exemptions to enter the Sandbox**: Market participants wanting to conduct trials within the Sandbox will need to separately apply for exemptions from specific Code provisions that would otherwise prevent the trial from going ahead. The Authority will support participants selected as part of the EOI with this process.

c) **Sandbox duration**: Approved trials would be eligible to operate within the Sandbox for a specified term. Our initial view is that Sandbox trials would operate for up to 18 months.

d) **Defined trial scope**: As part of the trial exemption conditions, participating organisations will be required to provide and/or agree to:

- clearly defined trial objectives
- specified customer groups
- agreed operational processes
- risk management controls.

e) **Monitoring and reporting**: As part of the trial exemption conditions, and as noted in the Sandbox objectives, participating organisations will be required to provide regular information to the Authority,[3] including (but not necessarily limited to):

- usage and participation data, including the ICP identifier of participating customers
- consumption and/or export data of participating customers
- relevant hardware (eg, installed battery capacity) of participating customers
- total distributed generation of participating customers (if available and relevant)
- metering upgrade costs (if required)
- plan and tariff information (both before and during trial)
- payments and billing of participating customers
- feedback from participating customers
- demographic characteristics of participating customers/households
- customer complaints
- operational performance

[3] We note that some participants may already be providing some this data to the Authority via the retail market monitoring information notice or other means. In these cases, the data does not need to be resubmitted provided there is clear identification of data related to the trial (such as ICP identifiers and dates). If required, the Authority may request additional information from the participants. Other trial participants may be provided exemptions from requirements such as the retail data notice on condition that they provide the information required for the trial.

- issues and incidents
- lessons learned
- benefits and costs to organisations conducting a trial(s), such as capital and operating costs of trial, changes in revenue and cost to serve
- any further data required based on specific trial objectives.

f) **Concluding trials and exiting the Sandbox:** In order for participants to exit the Sandbox at the end of the trial period, all exemptions will have exit conditions to ensure any Sandbox trials can end in specified circumstances without having to revoke the exemption, and that any ICPs and/or consumers involved in any trials can transition back into normal regulatory settings without issue.

g) **Evaluation**: The Authority will use the data collected to develop metrics to compare trial outcomes to each other and to counterfactual outcomes to refine its cost-benefit analysis of the proposed MTRs reforms to inform future regulatory decisions. Examples of metrics to be calculated include consumer savings (or costs), changes in customer consumption, increased revenue (or costs) for consumers and participants, and wider system impacts through peak savings (or congestion) and network benefits (or costs). Ultimately, these metrics will be used to assess total net benefits and benefit-cost ratios.

5.3 The Authority intends to work closely with all organisations involved in trials throughout the Sandbox's operation period to help coordinate their trial(s), answer questions where relevant and to share any learnings as required.

The Sandbox will be implemented in a way to minimise impacts on normal market systems

The registry is the key tool to enable Sandbox trials

5.4 To trial MTRs and gain insights into any potential implementation challenges or unintended impacts on other participants, market participants in the Sandbox need access to the appropriate tools to carry out their trials.

5.5 The key tool of relevance is the Electricity Registry (registry), the national database of every electricity connection in New Zealand.

5.6 The Authority wants to ensure that any investment in the Sandbox is good value and, as a result, one of two options will be taken to enable Sandbox activities.

5.7 If uptake is high, a dedicated registry environment will be set up to simulate the potential mass-market solution. The proposed Sandbox registry environment would support the management of participating ICPs, or the relevant components of those ICPs and related market activities. All non-participating ICPs and market participants would remain within the production registry environment.

5.8 With a more modest uptake, the Sandbox will utilise a duplicate ICP approach which does not require any development in the registry. This approach has proven to be suitable in existing innovator-led MTRs trials, but is less representative of the potential mass-market solution.

5.9 The technical specifications associated with either technical approach will depend upon the range of trials to be enabled in the Sandbox.

5.10 A user manual and training will be provided to market participants who are selected to enter the Sandbox.

Any trials which require reconciliation changes are out of the Sandbox's scope

5.11 Complex MTRs use cases, including sophisticated approaches to peer-to-peer trading may require changes to the reconciliation manager's processes.

5.12 This will likely result in increased Sandbox costs and the Authority does not consider changes to the reconciliation process will be required to sufficiently deliver on the Sandbox's objectives.

5.13 As a result, changes to reconciliation manager processes are outside the Sandbox's scope.

5.14 However, the Authority is open to considering Sandbox trial proposals for complex use cases where the trial participants manage any additional reconciliation responsibilities themselves (eg, the role of the data agent in the Franklin energy sharing pilot).

The Sandbox will be location bound to simplify compliance and monitoring arrangements

5.15 By definition, a Sandbox is a controlled environment, with specific time and location constraints, where the opportunities and risks associated with different innovations can be understood using relaxed (or different) regulatory settings.

5.16 Enabling MTRs to be trialled requires regulatory exemptions for both the distributor and metering equipment provider (MEP), as well as the secondary retailer/participant associated with a specific ICP.

5.17 For simplicity, given the Electricity Industry Act 2010 (Act) requires each market participant to individually apply for exemptions, the Authority considers nominating a single location to 'host' the Sandbox is appropriate to minimise the requirement of monitoring multiple trials across multiple regions.

The Sandbox will be located in Queenstown Lakes and Central Otago

5.18 Following an assessment of the 38 electricity network reporting regions, Queenstown Lakes and Central Otago were selected to host the Sandbox due to high consumer appetite, community and industry readiness, and location scalability.

Consumer appetite

5.19 In order to trial many MTRs use cases, distributed generation (DG) is required. The selected regions have among the highest uptake of DG, as well as the highest rate of uptake, in the country.[4,5,6]

(a) Central Otago has the highest relative uptake of DG nationally and is among the fastest growing regions. Installing DG in Central Otago also has the highest rate of return nationwide.

(b) Queenstown Lakes is ranked fourth nationwide on the penetration and growth rate of solar installs and is considered to have the second largest rate of return.

5.20 A key reason for the selected region's potential interest in trialling MTRs is the costs of living.

5.21 Queenstown residents face New Zealand's highest electricity costs and highest mortgages and rents relative to their incomes (noting the median household income in Queenstown is effectively nationally-representative).[7,8]

Community and industry readiness

5.22 Due to the cost-of-living pressures and other external factors, the community in the selected regions are actively aware of the opportunities of electrification and using energy you make yourself through installing distributed generation.

5.23 This is through the presence of:

(a) events such as Electrify Queenstown

(b) significant interest and advocacy from the local district councils (who have been calling for an energy innovation sandbox)

[4] Installed distributed generation trends | Electricity Authority

[5] Commercial scale solar in New Zealand | EECA

[6] Understanding the value of residential solar PV and storage in NZ | EECA

[7] Regional power prices | Electricity Authority

[8] Infometrics Regional Economic Profile

(c) local expertise, advocacy and community support provided by Rewiring Aotearoa and their sister organisation, the Queenstown Electrification Accelerator (QEA), and

(d) other community groups such as the Arrowtown Energy Nerds, Electrify Wānaka and Electrify Cromwell.

5.24 Community interest in energy innovation has already led to a number of trials, hosted by the QEA with funding from EECA, including New Zealand's first Vehicle-to-Grid trial and a Business Battery Project (both of which have the potential to be involved with MTRs trials).[9,10]

5.25 Local industry is also aligned with the community. The primary distributor associated with these regions is Aurora Energy. PowerNet are also present in the region through operating the Lakeland electricity network at Frankton, along with embedded networks in Wānaka and Cromwell.

(a) Both these distributors have demonstrated interest in implementing non-network solutions with Aurora currently with an open call for flexibility service providers to manage constraints on their network and PowerNet recently investing in Queenstown's first grid-scale BESS.[11,12]

(b) They have also been engaging with the local community alongside the grid owner (Transpower) with respect to upcoming lines upgrades.[13] This includes investigating non-traditional solution opportunities to defer infrastructure investment.

Location scalability

5.26 Queenstown Lakes and Central Otago represent a good Sandbox location due to the opportunity to conduct a wide range of trial use cases.

(a) Queenstown Lakes is considered more urban than the national average and has among the highest proportion of renters nationally, making it good to trial use cases such as solar for renters.

(b) Central Otago is the opposite with a greater rural population than the national average with very few renters, enabling trials associated with ICP aggregation and flexible load provision.

[9] Vehicle To Grid Trial | QEA

[10] Business Battery Project | QEA

[11] Aurora Energy Flexibility Solutions Guide

[12] Lakeland Network Partners on first grid-scale battery for Queenstown – PowerNet

[13] Energising Queenstown

6. Next steps

6.1 The proposed process to enter the Sandbox is as follows:

Stage 1: Expression of interest

6.2 Interested organisations complete the Expression of Interest (EOI) form (https://www.ea.govt.nz/industry/electricity-innovation-sandbox/apply). Additional guidance for completing the form is provided in Appendix C.

Initial assessment

6.3 The Authority will assess EOIs received against the criteria set out in point 4.17.

6.4 The Authority will undertake the EOI assessment process in a fair, impartial, and transparent manner, having regard to its assessment criteria and the objectives of the Sandbox.

6.5 While all EOI responses will be considered on their merits, the Authority reserves the right to make decisions regarding participant selection, trial approval, and Sandbox participation.

Information gathering discussions

6.6 Following the initial assessment, Authority staff will meet with organisations to discuss their EOI response, including:

a) their proposed trial(s) in further detail via a consistent set of additional questions such as how the trial will achieve the objectives of the Sandbox, and testing assumptions made about the trial operation

b) the Authority's expectations including trial monitoring, data, and reporting requirements.

Authority selects applicants to enter Sandbox

6.7 Considering the selection criteria, the Sandbox objectives and the additional information gathered, the Authority will select preferred EOI respondents to enter the Sandbox.

Stage 2: Authority supports detailed design of Sandbox trials

6.8 Entry into the Sandbox will be conditional on participants entering into agreements with the Authority, reflecting a commitment to conduct a trial in the Sandbox.

6.9 Once agreements are entered, Authority staff will work closely with preferred organisations on their trial(s) design to ensure it will produce the evidence to inform regulatory decisions.

6.10 The Authority will guide preferred organisations through the exemption application process, including identifying the Code exemptions that may be required for their trial(s) to go ahead.

Stage 3: Authority decision on exemptions

6.11 Following the detailed trial design process, selected organisations will be invited to apply for regulatory exemptions (note approval of Sandbox exemptions is not guaranteed).

6.12 The Authority Board will decide on whether to approve Sandbox trial exemptions and any associated conditions. Applicants will be advised of the decision outcome and reasoning.

Stage 4: Trial implementation

6.13 Once exemptions have been granted and gazetted, participants approved to enter the Sandbox may commence trials in accordance with approved conditions.

Appendix A Detailed objectives of the Sandbox

A.1 The primary objective of the Sandbox is to build the evidence base needed to assess whether new regulatory arrangements could deliver net consumer benefits and to understand the costs, risks and implementation challenges associated with those arrangements.

A.2 An example of these new regulatory arrangements is MTRs, however this does not mean that there is not a more suitable alternative. For example, the Sandbox may demonstrate that MTRs are beneficial, that another approach is preferable, or that no regulatory reform should proceed.

A.3 We are specifically interested in understanding whether and how the products and services trialled in the Sandbox provide greater consumer choice, costs savings, greater participation in the electricity market, and incentivise changes in demand side behaviours.

A.4 We are equally interested in understanding circumstances where MTRs or related market arrangements do not deliver net consumer benefits, create unintended consequences, increase costs, or impose risks on consumers, participants or the wider electricity system.

A.5 We also want to better understand:

(a) the extent to which MTRs could enable new products and services,

(b) the costs of implementing changes to the electricity system that would be necessary to allow for MTRs on a nationwide scale, and

(c) whether there are alternative regulatory approaches to MTRs which lead to similar consumer benefits at a lower cost.

A.6 The core policy question for the Sandbox to answer is would MTRs or alternative arrangements deliver net consumer benefits compared with the status quo?

We are interested in understanding which use cases (if any) are most likely to deliver net consumer benefits

A.7 The Authority is interested in exploring a range of trials within the Sandbox to test various potential multiple trading use cases to inform future regulatory decisions.

A.8 Our key focus is understanding which use cases are most likely to deliver consumer benefits (of the type noted above) which can then be assessed against any implementation costs.

A.9 These use cases include, but aren't necessarily limited to:

(a) **Peer-to-peer trading or energy sharing:** Allowing electricity generated at one location to provide benefits to consumers at other locations, such as:

(i) Selling excess generation to family, friends and neighbours through community energy sharing schemes.

(ii) Donating excess generation via social and/or charity oriented solar sharing arrangements.

(iii) Aggregator programmes, such as battery-as-a-service, where consumers with solar but no battery, can access community storage allowing energy to be provided to the market at the best times.

(b) **Sharing distributed generation (DG) with tenants**: Allowing landlords and tenants to more easily benefit from DG investments, such as rooftop solar, at tenanted premises.

(c) **Competition for electricity exports**: Allowing consumers to switch their provider for electricity exports without switching their consumption retailer.

(d) **Virtual power plants (VPPs)**: Allowing specialist providers and aggregators to access customers' generation resources (eg, batteries, vehicle-to-grid) to respond to market and network signals.

(e) **Flexible load service provision (ie, multiple consumption retailers):** Enabling specialist providers to manage EV charging, hot water systems, batteries, or other controllable loads independently from a customer's primary retailer.

A.10 See the Appendix B for further details on the above use cases.

A.11 The Authority welcomes additional use cases to be proposed that could demonstrate value for consumers and the electricity sector.

A.12 The only specific use case which the Authority is excluding from the Sandbox scope at this stage is intraday or intraweek retailing, where a consumer could have different consumption retailers for different hours of the day or for different days of the week.

A.13 The key policy question we have with respect to use cases is understanding what the priority use cases are, from the perspective of which MTRs-enabled (or alternative) products and services:

(a) are most likely to deliver identifiable consumer benefits,

(b) have the greatest consumer demand,

(c) are market participants interested in offering to consumers,

(d) which are most likely to be scaled nationally if reforms were implemented.

We want to understand the conditions likely to be required for MTRs reform to deliver net consumer benefits

A.14 To understand whether MTRs can deliver net consumer benefits, the Authority is interested in identifying the regulatory, operational and market conditions required for different use cases to succeed.

A.15 This includes the need for any additional Code reforms, or reforms in other regulations.

A.16 As a result, Sandbox trials may require other Code exemptions (in addition to those to enable MTRs) to create the necessary conditions such that a net benefit is delivered to consumers.

A.17 The Authority is also interested in identifying whether barriers exist in other regulatory regimes, potentially limiting the benefits of any Authority proposed reforms or increasing any associated costs. The Authority will work closely with other regulators if such barriers arise.

A.18 The key policy questions we have with respect to the conditions required for MTRs to deliver net consumer benefits are:

(a) What are the relevant Code changes required for MTRs-enabled products and services to deliver net consumer benefits?

(b) What are the relevant changes needed to market and participant processes for MTRs-enabled products and services to deliver net consumer benefits?

(c) What are the non-Code barriers, for example in other legislation or regulations, currently in place which need to be removed for MTRs-enabled products and services to deliver net consumer benefits?

A.19 A key overriding policy question is what are the costs associated with making each of these changes to the electricity system at scale and who bears them.

A.20 This may result in the outcome that there are no regulatory, operational or market conditions which enable certain use cases to succeed.

We are also interested in enabling trials within the Sandbox which deliver similar consumer outcomes through alternative approaches

A.21 Through engagement with stakeholders, the Authority has been told that similar outcomes to MTRs can already be achieved under current regulatory arrangements.

A.22 The Authority is interested in receiving trial proposals to enter the Sandbox which demonstrate how similar consumer outcomes to enabling MTRs can be achieved through alternative regulatory or market arrangements.

A.23 The key policy questions we have with respect to whether similar consumer outcomes can be achieved without MTRs reform include:

(d) Can similar products and services be provided to consumers without MTRs reforms?

(e) If yes, are the net consumer benefits (including financial benefits and ease/simplicity of access) of these products and services similar, better or worse compared to MTRs-enabled products and services?

(f) What are the costs (if any) associated with offering these products and services to consumers?

There are several other questions which we think can be answered through MTRs Sandbox trials

A.24 In addition to our core policy questions, we think the Sandbox will also help the Authority understand:

(g) the potential for MTRs-enabled services to defer infrastructure investment.

(h) broader benefits associated with supporting consumers in hardship.

(i) potential impacts (including costs) on non-participating organisations (ie, market participants who are not involved with or offering MTRs-enabled products and services).

Sandbox trials will create the evidence base to inform regulatory decisions on MTRs

A.25 To answer the range of research questions that we have, the Authority will gather information from market participants conducting trials within the Sandbox.

A.26 The information gathered will be used to inform policy analysis of MTRs reforms and different implementation options. A key consideration is how representative the Sandbox results are of the outcomes expected under any broader Code and market reform.

A.27 The key metrics used from trial outcomes to assess implementation options will be total net benefits, and benefit-cost ratios.[14] These will be used to assess which options (including the status quo) produce the greatest system benefit and how much of those benefits fall to consumers.

[14] We may separately report these metrics across consumers and participating organisations (ie, excluding wealth transfers between organisations and consumers), as well as for consumers only.

A.28 Other considerations in assessing implementation options will include total system costs, consumer demand, how costs and benefits are distributed among different consumer groups and participants, and potential unintended consequences.

A.29 We will also assess if the trial participants are representative of wider New Zealand, and the scalability of the trial outcomes to the nationwide context.

A.30 The types of raw data that the trials should provide include:

(j) trial ICP identifiers and associated data from before and during the trial including:

(i) consumption data (including exports)

(ii) disconnections

(iii) reconnections

(iv) new connections of distributed generation.

(k) types of tariffs/plans offered to consumers in trial(s)

(l) increased revenue (or losses) of market participants facilitating trial

(m) consumer savings and additional income (or additional spend)

(n) evidence of infrastructure deferrals as a result of new product or service

(o) evidence of distribution congestion costs alleviated

(p) incidents requiring remediation

(q) customer complaints

(r) any observable unintended consequences

(s) participant capital and operating costs (including system updates, marketing spend etc)

(t) manual process workarounds to enable the trials with existing systems.

A.31 Importantly, the Authority's access to evidence generated in any Sandbox trial underpins not only the reason for the trial itself but provides the basis for granting any regulatory exemptions as these are required to meet the statutory exemption test.[15]

A.32 Data sharing will form part of the conditions of granting any trial exemptions.

A.33 If Sandbox trials do not require regulatory exemptions, trial participants will also be asked to provide the Authority with relevant information through a data sharing agreement.

[15] Part 11 clause 2 of the Electricity Industry Act 2010 states that *The Authority may grant an individual exemption to an industry participant or a specified person (as the case may be) only if the Authority is satisfied that it is not necessary, for the purpose of achieving the Authority's objectives, for the participant or specified person to comply with the Code or the specific provisions of the Code.*

Appendix B Detailed use case examples

Use case 1: Peer-to-peer trading or energy sharing

Overview

B.1 Peer-to-peer trading and energy sharing would allow distributed generation (DG) owners to sell or share the value of surplus electricity to other consumers.

B.2 Recipients could include family members, community groups, social housing tenants, or other designated beneficiaries.

Why are we interested?

B.3 Current arrangements generally limit the value of distributed generation to self-consumption and retailer export tariffs.

B.4 Energy sharing models could increase the return on investment of distributed generation through potentially higher export revenues, improve affordability for recipients through potentially lower consumption costs, support community energy initiatives, encourage local use of system charges, and help address energy hardship.

B.5 The key potential benefits are:

(a) increased income to DG owners

(b) lower electricity prices for consumers without DG.

B.6 The key potential costs are:

(a) reduced primary retailer revenue to those servicing both the DG owner (due to lost export value) and the energy sharing recipient (due to lost consumption value)

(b) capital and operating costs for delivery.

How might the trial work?

B.7 A secondary retailer, aggregator, or other market participant would monetise exported electricity from participating distributed generators (via their generation channel). A separate settlement mechanism, facilitated by the participant enabling the energy sharing, would then transfer some or all of that value to designated beneficiaries (on their consumption channel).

B.8 Trials could test a range of energy sharing models, including family and friends-based sharing arrangements, community energy schemes (such as battery-as-a-service, see use case 6), and social-purpose initiatives.

Why would this need regulatory change?

B.9 Most peer-to-peer and energy sharing models require participants to engage with more than one electricity provider.

B.10 The exception to this is when both the generator and the recipient are with the same retailer. However, it may not make sense for the recipient to change their retailer if that retailer has higher consumption tariffs or their products do not align with the recipient customer's preferences.

B.11 Regulatory change would enable both the generating and receiving parties to maintain their choice of electricity retailer. Exemptions and conditions would likely be required to enable multiple traders at a single ICP, and to support consumer protection, settlement, and information-sharing responsibilities.

Use case 2: Incentivising landlords to install distributed generation

Overview

B.12 An ‘incentivising landlords to install distributed generation (DG)’, or alternatively a ‘DG for tenants’, trial would allow a DG owner at a rental property (residential or commercial) to sell surplus generation to a trader (a retailer, generator or aggregator) whilst their tenant retains their choice of electricity supplier (primary retailer).

B.13 This means that DG owners receive any export generation revenue rather than this being credited to the tenant. There would also be scope for the DG owner to make an agreement to charge the tenant (either through a retailer or by becoming a retailer themselves) for their consumption of DG, potentially at a rate lower than the tenant’s existing consumption tariff.

Why are we interested?

B.14 Landlords currently have limited ability[16] to capture the value of any DG installed on their properties because the tenant typically receives the benefit through lower electricity bills. This creates a split-incentive problem, reducing incentives to invest in DG.

B.15 This type of trial would assess whether MTRs can encourage additional investment in DG, improve access to lower-cost electricity for tenants, and deliver wider system benefits.

B.16 The key potential benefits are:

(a) landlords can simply access a return on any DG investment, without registering as a market participant or limiting tenant choice

(b) system-level benefits such as peak reduction and/or network constraint management associated with the additional DG investment

(c) financial savings for tenants if they have access to DG at lower rates than their electricity supply tariff from their primary retailer.

B.17 The key potential costs are:

(a) capital costs of additional DG investment

(b) system-level costs such as new peaks or congestion following additional DG investment

(c) capital and operating costs for delivery.

How might the trial work?

B.18 The generation component of an ICP would be separated from the tenant's consumption component, allowing the landlord to contract with a different trader for exported electricity.

B.19 More advanced trials may also explore arrangements to share the value of self-consumed generation between landlords and tenants.

Why would this need regulatory change?

B.20 Regulatory change would allow landlords and tenants to engage different electricity providers. Exemptions and conditions would likely be required to enable multiple traders at a single ICP, and to support consumer protection, settlement, and information-sharing responsibilities.

[16] Limited ability refers to the fact that a) landlords may register as market participants to offer a behind-the-meter power purchase agreement for any DG, but the landlord would need to comply with any relevant Code obligations, b) landlords could increase property rent, but many have concerns of applying flat ‘DG charges’ without certainty of tenants’ financial savings, and c) landlords can access some existing retail products to achieve similar outcomes, but this limits the tenants’ choice of primary retailer.

Use case 3: Increasing competition for export tariffs

Overview

B.21 This use case considers the competition benefits from allowing consumers to sell electricity exported from rooftop solar or other distributed generation (DG) to a trader that is different from their electricity retailer.

Why are we interested?

B.22 At present, consumers with DG must switch their electricity supplier if they want to take advantage of a higher export tariff. This constrains the competitive pressure on retailers' offered export tariffs.

B.23 The key potential benefits are:

(a) increased competition between traditional retailers and new market entrants resulting in consumer savings through higher export tariffs and/or lower import tariffs

(b) additional investment in DG induced by higher export tariff offers

(c) system-level benefits if new products and services induce DG exports to respond more to network and wholesale cost signals.

B.24 The key potential costs are:

(a) reduced primary retailer revenue through either lost export or providing higher export tariff offers

(b) reduced ability for retailers to manage volume risk and potential cross-subsidisation through different tariff components to offset losses elsewhere

(c) capital and operating costs for delivery.

How might the trial work?

B.25 Participating consumers with DG could remain with their existing retailer for electricity consumption while contracting separately with another provider for exported electricity.

B.26 The trial could include innovative export products, such as time-varying export tariffs or network and/or spot price-linked export arrangements. It may also invite the development of new business models such as generation-only retailers (or 'aggregators').

Why would this need regulatory change?

B.27 Current arrangements do not allow consumers to sell exported electricity to a provider that is different from their consumption retailer.

B.28 Regulatory change would enable consumers to choose separate retailers for consumption and export at the same ICP. Exemptions and conditions would likely be required to enable multiple traders at a single ICP, and to support consumer protection, settlement, and information-sharing responsibilities.

Use case 4: Virtual power plants

Overview

B.29 Virtual power plants (VPPs) combine separate distributed energy resources (DERs) at multiple homes and businesses (including commercial and industrial) into a coordinated network that can operate like a single power plant.

B.30 A VPP could aggregate dispatchable generation resources, such as batteries (including those in electric vehicles), or controllable demand appliances such as EV chargers, hot water cylinders, cool stores etc.

B.31 A VPP trial would allow participating consumers to engage a specialist VPP provider alongside their existing electricity retailer and be appropriately rewarded for their participation.[17]

Why are we interested?

B.32 VPPs have the potential to improve the utilisation of DERs, increase consumer participation in electricity markets, and provide valuable services to the wider electricity system.

B.33 The key potential benefits are:

(a) system-level benefits from improved orchestration of DERs across wholesale market, ancillary services and networks (distribution and transmission)

(b) revenue to VPP operators

(c) increased income to DER owners through access to VPP tariffs or incentives.

B.34 The key potential costs are:

(a) reduced primary retailer revenue due to lost export value

(b) reduced ability for retailers to manage volume risk and potential cross-subsidisation through different tariff components to offset losses elsewhere

(c) capital and operating costs for delivery.

How might the trial work?

B.35 The VPP provider would contract with consumers across residential or commercial and industrial settings, to manage a portfolio of DERs while another retailer could continue supplying each customer's electricity under existing arrangements.

B.36 A trial would demonstrate whether VPPs deliver benefits to consumers and participants, can be operated safely and efficiently, and whether there are unintended impacts.

Why would this need regulatory change?

B.37 While VPPs can operate under current arrangements, regulatory change would allow consumers to engage directly with a specialist VPP provider and retain their existing retailer.

B.38 Exemptions and conditions may be required to allow multiple providers to operate at a single ICP, and support consumer protection, settlement, and information-sharing responsibilities.

[17] Some VPP-type products exist in the market today, but participants may not be being fairly rewarded for the benefits their generation, flexibility or both are providing to the system. For any generation dispatched by a VPP provider or aggregator, the consumer receives payment at their typical export tariff (irrespective of the market value). Similarly, any demand flexibility is incentivised through consumption savings and, in some case, small incentivises (which may or may not be representative of market value). The VPP provider or aggregator, if they are a different entity to the primary retailer, can't sell the energy on the market and can only access any value for their services through commercial arrangements with the primary retailer or through charging the customer directly.

Use case 5: Flexible load service provision

Overview

B.39 Flexibility service providers (FSPs) help consumers adjust when and how they use electricity in response to network conditions, prices, or system needs.

B.40 Using smart software, they can coordinate devices such as hot water cylinders, EV chargers, batteries, heat pumps, and other controllable loads to reduce demand during peak periods or increase demand when surplus electricity is available.

Why are we interested?

B.41 Flexibility products and services are expected to play an increasingly important role in supporting an efficient and reliable electricity system.

B.42 Time-of-use consumption tariffs are the first step, but these apply to all behind-the-meter loads. Benefits can only be realised if most demand can be shifted out of peak periods, potentially disincentivising consumer uptake, even for those consumers with flexible loads.

B.43 This type of trial would assess whether specialist electricity providers can unlock additional consumer and system value by managing flexible demand independently of a customer's primary electricity retailer.

B.44 The key potential benefits are:

(a) system-level benefits from improved orchestration of DER

(b) revenue to FSPs

(c) increased income to DER-owners through access to flexible consumption tariffs for certain loads.

B.45 The key potential costs are:

(a) reduced primary retailer revenue due to lost consumption value

(b) reduced ability for retailers to manage volume risk and potential cross-subsidisation through different tariff components to offset losses elsewhere

(c) capital and operating costs for delivery.

How might the trial work?

6.14 Participating consumers would be able to engage a specialist FSP alongside their existing retailer. This would likely result in multiple consumption retailers.

6.15 The FSP would manage the supply of electricity to flexible loads behind-the-meter to deliver demand response or other flexibility services, while the primary retailer would continue supplying electricity to flat or base loads under existing arrangements.

Why would this need regulatory change?

B.46 While flexibility services can be delivered under current arrangements, for example where a retailer contracts a FSP (or aggregator) to manage demand response on behalf of its customers, regulatory change would allow consumers to engage directly with specialist FSPs while retaining their existing retailer.

B.47 Depending on the trial design, exemptions and conditions may be required to support multiple providers at a single ICP and any consumer protection, settlement, and information-sharing responsibilities.

Use case 6: Battery-as-a-service

Overview

B.48 Battery-as-a-Service (BaaS) models enable a third-party provider to own and/or control a commercial (or larger) scale battery and optimise its operation on behalf of consumers.

B.49 There are different options for how a BaaS trial might work including:

(a) Behind-the-meter battery service: A trader operates a battery installed at a consumer's premises, optimises charging and discharging, shares value with consumer.

(b) Energy-sharing battery: A BaaS provider uses excess generation from a 'donor' DG system, optimises charging and discharging, shares value with 'beneficiary' consumers.

(c) Community battery: A trader operates a battery on behalf of a community, optimises charging (either from the grid or DG) and discharging, shares value with the community.

Why are we interested?

B.50 Specialist battery operators may be able to extract greater value from battery assets by responding to wholesale prices, network needs, and other market signals. It also enables consumers with DG to access the value of storage without needing to install it themselves.

B.51 This trial would assess whether BaaS models can improve battery utilisation, increase consumer value, support community initiatives, and enhance electricity system efficiency.

B.52 The key potential benefits include:

(a) system-level benefits from improved orchestration of batteries

(b) revenue to battery service providers

(c) increased income and/or reduced costs to consumers through assessing BaaS.

B.53 The key potential costs include:

(a) reduced primary retailer revenue to those servicing both community DG owners (due to lost export value) and the BaaS recipients (due to lost consumption value)

(b) reduced ability for retailers to manage volume risk

(c) capital and operating costs for delivery.

How might the trial work?

B.54 A BaaS provider would manage battery operations and would share some value with participating consumers (who either own the battery or provide generation to charge it).

B.55 Depending on the trial design, the provider may participate in wholesale and ancillary service markets, provide network constraint management services, support local energy sharing arrangements, or optimise battery operation with certain loads to reduce customer costs.

Why would this need regulatory change?

B.56 Some BaaS models can operate under current arrangements. However, regulatory change could allow consumers to engage with a BaaS provider without switching primary retailer.

B.57 This would enable traders to offer BaaS services independently of primary electricity supply and test whether greater competition and local use of system improve customer outcomes.

B.58 Exemptions and conditions may be required to allow multiple providers to operate at a single ICP, and support consumer protection, settlement, and information-sharing responsibilities.

Appendix C Expression of Interest form guidance

C.1 The Authority invites parties interested in conducting a trial in the Electricity Innovation Sandbox to complete this expression of interest form (EOI) and submit it by 28 May 2027.

C.2 EOIs need to be prepared collaboratively with industry participants (retailers, distributors and metering equipment providers), as these parties are subject to the Electricity Industry Participation Code 2010 and may require regulatory exemptions to participate.

C.3 EOIs should be submitted jointly by all parties required to deliver the proposed trial. If an EOI is not jointly submitted, the applicant will need to provide the Authority with evidence of commitments from other participants who will be involved in the trial.

C.4 Please consider the Sandbox objectives, assessment criteria, the trial use case examples and the Sandbox terms and conditions when preparing your EOI response.

C.5 Where relevant, applicants may submit additional information. This may include, but isn't limited to, providing more detailed documents about how their trial will work in practice ie, a trial design and/or methodology.

C.6 EOIs will be assessed in two rounds:

(a) Round 1 - EOI responses received by 28 February 2027 will be assessed for entry into the Sandbox on or before 1 July 2027

(b) Round 2 - EOI responses received between 1 March and 28 May 2027 will be assessed for entry on or before 1 October 2027.

C.7 If sufficient detailed design information is provided to the Authority at this stage in the process, and there is an interest from trial participants, Sandbox trials may be permitted to begin before the proposed 1 July 2027 start date.

C.8 In special cases where there is demonstrated consumer demand for a service, but no market participant willing to offer it, the Authority will consider how best to enable respondents (including non-participants at the time of application) to undertake a trial within the Sandbox.

C.9 Due to the time-bound nature of the Sandbox and the trials within it, the Authority will only consider EOI that require energy assets where those assets already exist, or will be installed, irrespective of participation in the Sandbox.

C.10 Participation in the Sandbox does not guarantee regulatory change. Potential participants should not make investment decisions on the assumption that regulatory change will occur.

C.11 Any questions about the EOI should be directed to Jono Barnard, Power Innovation Pathway Manager by email to innovate@ea.govt.nz.

ELECTRICITY AUTHORITY
TE MANA HIKO