

29 February 2024

Sarah Gillies  
Chief Executive  
Electricity Authority  
PO Box 10041  
WELLINGTON 6143

Sent via email: [retaildata@ea.govt.nz](mailto:retaildata@ea.govt.nz)

Dear Sarah

## Improving retail market monitoring

1. This is a submission from the Major Electricity Users' Group (MEUG) on the Electricity Authority's (Authority) consultation paper "*Improving retail market monitoring: clause 2.16 information notice*"<sup>1</sup> published for consultation on 5 December 2023.
2. MEUG members have been consulted on the approach to this submission. Members may lodge separate submissions. This submission does not contain any confidential information and can be published on the Authority's website unaltered.

### Support streamlining of requests with recommendations for further areas of analysis

3. MEUG welcomes the Authority's discussion on how to improve its monitoring of the electricity retail market. While not a directly affected party, we support moves to streamline and consolidate the data request process and improve the transparency of retail market performance. We wish to make the following observations on this consultation paper and the retail market as a whole:
  - We support moves to monitor the uptake of Time of Use Plans (TOU) by consumers, as well as analysis of how retailers are passing through electricity distribution businesses' (EDBs) TOU tariffs. We believe that TOU plans will play an important role with managing and smoothing electricity demand during the energy transition. We also encourage a greater focus on multi-party relationships as an avenue to deliver demand-side response and achieve compensation for customers.
  - We encourage work by the Authority to open up metering data, including low voltage power quality data, to all EDBs to enable more timely monitoring and optimisation of the distribution network.

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<sup>1</sup> <https://www.ea.govt.nz/projects/all/improving-retail-market-monitoring/consultation/improving-retail-market-monitoring-clause-216-information-notice/>

- In the longer-term, we strongly encourage the Authority to look at how all retailers can report financial results on the same basis. For example, requiring all retailers (regardless of ownership structure) to report results as if a standalone business, with clearer data on profits/losses and the price of electricity it brought from the wholesale market and sold on to consumers. We consider that this would provide greater insight into the state of competition of the retail electricity market.
4. We would welcome the opportunity to discuss these areas further with Authority staff.

### Next steps

5. If you have any questions regarding our submission, please contact MEUG on [REDACTED]

Yours sincerely

A handwritten signature in black ink, appearing to read "K Boyes", with a long horizontal flourish extending to the right.

**Karen Boyes**  
Major Electricity Users' Group