

Supporting consumers to compare and switch electricity plans

Decision paper

9 July 2024

Executive summary

Consumers are at the heart of everything the Electricity Authority Te Mana Hiko (the Authority) does. Electricity is a crucial service in our everyday lives and one that will continue to innovate and develop for future generations.

Consumer mobility and the consumer of the future

The Electricity Authority envisions a future where every consumer is empowered to take full advantage of a dynamic and competitive energy market. In this new landscape, consumers are not just passive users of electricity but active participants, equipped with data and innovative tools to make informed decisions. This is what we call **consumer mobility**.

We imagine a world where you can seamlessly switch providers, choose sustainable energy options, and even sell surplus power back to the grid, all with a few taps on your smartphone.

This is a future in which consumers have more control over their energy bills and reduce their carbon footprint. By fostering competition, we aim to drive innovation and the delivery of better services, ultimately putting the power—literally—back in consumers' hands.

We recognise significant challenges ahead, from upgrading our infrastructure to ensuring equitable access to new technologies. We are committed to making this vision a reality by encouraging investment in cutting-edge technologies, enhancing our regulatory frameworks, and engaging with stakeholders to build a system that truly serves the needs of consumers now and into the future.

Comparing and switching electricity plans easily matters

Supporting consumers to easily compare and switch electricity plans is key to our vision for improved consumer mobility. By supporting consumers, we empower them to manage their energy consumption and costs effectively, while fostering competition in the electricity retail market.

Today, consumers face complexities when comparing and choosing a power plan that best suits their household's energy needs and budget. We want to ensure consumers have access to accurate and timely information and processes to make informed choices about the best electricity plan for their household or business.

We have made four decisions to improve consumer mobility

Following consultation, the Authority has made four key decisions on how we will support consumers to compare and switch electricity plans.

The Authority will procure a comparison and switching service.

We will continue to support an externally run comparison and switching website.

We will shortly launch procurement processes to ensure we have a new contract in place by 1 July 2025.

1

The Authority will explore alternative funding models.

We will consider different funding arrangements to ensure consumers trust the comparison service, including models where the Authority covers the full cost.

2

The Authority will develop and implement changes to give consumers an enhanced comparison and switching experience.

Alongside selecting a service provider we will explore, develop, and implement improvements to address some of the feedback we received, such as mandating retailer participation, standardising information, and enhancing access to data.

3

The Authority will explore other options to improve consumer mobility.

We will broaden initiatives to support consumers in making informed choices, including exploring options for better access to consumption data.

4

Next steps

We will begin a competitive tender process to secure a comparison and switching service provider for a contract term beginning 1 July 2025.

Concurrently, we will develop and implement changes to address some of the feedback received, to give consumers an enhanced comparison and switching experience and improve consumer mobility in general, with a focus on how we can improve access to information and data.

We are committed to serving consumers by promoting a more competitive electricity retail market. We look forward to working with stakeholders to achieve this, and we will report publicly on progress.

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1. Purpose

- 1.1. This paper presents the Authority's programme of work to enhance consumer mobility by supporting consumers to compare and switch electricity plans. This programme is informed by feedback received from our recent consultation paper *Options to Support Consumer Comparison and Switching*.

2. Introduction

The Authority is committed to supporting consumers to make informed choices

- 2.1. The Authority envisions a future in which consumers are empowered and equipped with the necessary tools to make informed electricity decisions.
- 2.2. To achieve this, the Authority is working on initiatives that will give consumers tools and information that will enable them to have more control over their power use and access to new electricity products and services (including those that reward consumers for being flexible with their electricity usage). Consumers will need greater access to information about these products and services to understand the choices available to them and the benefits of making those choices.
- 2.3. These initiatives will enhance consumer mobility, enabling consumers to benefit from competitive markets and innovative technologies, ultimately driving a more efficient and consumer-centric landscape in a more electrified economy.
- 2.4. In early 2024 we consulted on options to support consumer comparison and switching. The consultation paper considered how the Authority can better support consumers to compare electricity plans and facilitate switching if consumers find a better option. In particular, the paper considered the best platform through which the Authority could provide this support.
- 2.5. We also explored additional ways we could support consumers by making energy choices easier for New Zealanders, raise consumer engagement with the retail electricity market, and educate consumers about the benefits of maximising the benefits of an increasingly diverse and innovative electricity market.

Our electricity use is changing, and with it the electricity market

Evolution of our electricity use

- 2.6. Electricity is crucial to modern life: from small daily tasks, like boiling the kettle, to more significant activities like keeping homes healthy and warm, being digitally connected, or charging electric vehicles. Consumers are also more conscious of the environmental impact of their energy use and are seeking smarter choices about their energy generation and when they choose to use it.

Evolution of the market

- 2.7. The retail electricity market in New Zealand is transforming in response to evolving consumer needs and technological advancements. Electricity retailers are offering more diverse plans such as bundled services, time-of-use rates, and promotional

incentives. However, increased options can complicate decision-making for consumers.

- 2.8. Consumers need easy access to accurate, understandable, comparative information to make informed energy decisions now and into the future, especially amid rising living costs. The Authority is taking a proactive approach to supporting consumers in this changing environment. We want to ensure any comparison service we support will quickly adapt to new and emerging technologies, and other developments in the retail electricity offerings to consumers.
- 2.9. As such, the Authority considered it timely and beneficial to reassess how we can best support and promote consumer comparison and switching services.

The current service faces challenges

- 2.10. The Authority currently contracts Consumer NZ to provide Powerswitch – a comparison and switching website tool with an annual budget of approximately \$1.4 million. This includes a development plan for ongoing improvements to the site.
- 2.11. The accelerating pace of technological change, together with growing complexity and choice in the market, means the challenges to be addressed by a comparison and switching service are increasing.
- 2.12. Data from the Authority indicates most New Zealanders switch retailers infrequently - on average, around 10,000 'trader' switches (not motivated by a house move) each month. These low switching rates indicate consumers are not actively comparing their electricity plans with those available on the market and may not be getting the best deal available to them. This could be both in terms of taking advantage of competition between providers to get the best value for their money, or not making the most of innovative plans, products or technologies.
- 2.13. Furthermore, comparison service providers currently face significant challenges in accessing consumption data, limiting their ability to offer accurate recommendations and innovate their service. Giving consumers greater access to their own electricity data is essential to promote innovation in electricity services, meaning that addressing the barriers to accessing accurate data is a priority for the Authority.

Consumer mobility is wider than just comparison and switching

- 2.14. Consumer mobility encompasses both accessibility and affordability. The Authority is working on several projects to support consumer mobility beyond comparison and switching.
- 2.15. The Authority wants to ensure consumers are well supported with the tools and services needed to benefit from a competitive electricity market and new technologies and innovations. Feedback from the consultation highlighted the need for broader improvements and additional tools to aid consumer decision-making.
- 2.16. There is also a growing need for consumers to have access to plans that reward flexibility in electricity consumption. The use of distributed energy resources such as solar, home battery systems, controllable EV chargers and water heaters is increasing across householders and businesses.
- 2.17. Distributed energy resource can provide flexibility in the electricity system as individuals and traders manage consumption to minimise costs and maximise their

electricity usage. This flexibility can help lower costs for consumers and increase overall system security. Providing efficient incentives to adopt or engage with flexibility services is one way to encourage its uptake.

- 2.18. The Authority has important work underway, focusing on encouraging flexibility by reducing regulatory barriers to innovation and investment, ensuring cost-reflective market and network price signals, and increasing transparency and access to information (for both consumers and industry participants).
- 2.19. Our broader programme of work to enable flexibility is an intrinsic part of our approach towards improving consumer mobility.

3. A quick look at our consultation paper and the feedback we received

Our consultation paper explored options to improve consumer comparison and switching in the retail market

- 3.1. The Authority sought feedback on eight options to support consumers in comparing and switching electricity plans – five website-related options and three consumer choice support options.

Website-related options

- **Option 1:** No Authority/Government supported website.
- **Option 2:** Retailer-run collective website.
- **Option 3:** Authority-accredited, externally run websites.
- **Option 4:** Authority-supported existing or new, externally run websites.
- **Option 5:** Expanded Government utility comparison website.

Consumer choice support options

- **Option A:** Retailers provide consumers with the best plan information.
- **Option B:** Community advisers to support comparison and switching.
- **Option C:** Promotional activity and campaigns for comparison and switching services.

The Authority proposed a four-pronged approach

- 3.2. The Authority's preference in the consultation paper was a four-pronged approach of website Option 4 and consumer choice support Options A, B and C. The Authority considered this the most comprehensive support package to assist consumers in comparing and switching electricity plans.

Summary of feedback on the Authority's proposed options



3.3. We received 79 submissions and a summary of feedback on the proposed options is provided below. Appendix A includes more commentary on the feedback received A.

Website options

3.4. Option 4 (Authority-supported website) was strongly supported by submitters. Most supported this option as the most suitable means of promoting the benefits of switching to consumers, and to promote market competition and ensure an independent and trustworthy service.

3.5. Option 5 (expanded government utility comparison website) was also supported by consumer submitters, due to its capability to compare multiple utilities through a convenient one-stop-shop that would greatly benefit consumers by saving time and effort.

Consumer choice support options

3.6. Option A (best plan information) was supported by consumers and consumer advocates but was not supported by retailers, who raised concerns about the potential costs and practical challenges of implementing this option.

3.7. Option B (community advisers) was generally supported by both consumers and retailers. It was felt this would be the most effective intervention to address specific barriers targeting vulnerable consumers and those who struggled to switch. Submitters noted there are several similar existing initiatives.

3.8. Option C (promotional activity) was supported by consumer submitters, some retailers, and independent switching providers, but criticised by others as being potentially expensive and ineffective.

The Authority's proposed four-pronged approach

3.9. Feedback on the Authority's four-pronged approach was varied, mostly due to the mixed reception to the consumer choice support options (given we proposed

progressing all three options). However, all submitters supported both a website option and at least one consumer choice support option, demonstrating support for a multi-faceted approach.

- 3.10. A high-level breakdown of submissions is included in the next section. A more detailed summary of submissions is included as Appendix A.

4. Authority’s decision: four key actions

- 4.1. The Authority has decided on four actions to improve comparison and switching and promote consumer mobility:

<p>Procure</p> <p>Begin a procurement process to secure a provider of a comparison and switching service</p> <p>Mid-2024 to mid-2025</p>	<p>Fund</p> <p>Consider alternative funding models for the comparison and switching service</p> <p>Mid-2024 to mid-2025</p>	<p>Enhance</p> <p>Develop enhancements to the comparison and switching service</p> <p>Mid-2024 to mid-2025 onwards</p>	<p>Broaden</p> <p>Explore broader multifaceted approaches to improve consumer mobility</p> <p>2025 onwards</p>
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Action 1: Procure

- 4.2. The Authority has decided to progress Option 4 by supporting a comparison and switching service, to be selected through a competitive tender process. This will deliver a user-friendly, accessible, and inclusive service that drives competition.

Action 2: Fund

- 4.3. Many submitters – including consumers, advocacy groups, and retailers – emphasised the perception of the independence of the comparison and switching service is vital when seeking to engage consumers. Many individual consumer submitters expressed mistrust towards a service they perceived to be compromised due to commercial influence.
- 4.4. As part of the procurement process, the Authority will consider alternative funding model proposals for the provision of the comparison service, including whether the full cost of the contract should be funded by the Authority.
- 4.5. Full funding from the Authority was a prevalent suggestion among those who raised concerns about trust and confidence in the service. For context, Powerswitch currently receives funding from the Authority for approximately 75% of the cost to run and promote Powerswitch (~\$1.4m per annum). The remaining 25% is funded by a switching fee paid to Consumer NZ by retailers for each successful switch through the Powerswitch website.

Action 3: Enhance

- 4.6. The Authority will develop and implement changes to address some of the feedback received to give consumers an enhanced comparison and switching experience.
- 4.7. We will deliver enhancements in three ways:
- (a) As part of the procurement process to secure a provider of a comparison and switching service from 1 July 2025.
 - (b) Through amendments to the Electricity Industry Participation Code 2010 (the Code) to be progressed in parallel with the procurement process.
 - (c) Through an enhancement roadmap agreed with the future provider of the service.

Enhancements as part of the procurement process

- 4.8. During the procurement process, the Authority will seek a provider who can immediately deliver an improved service beyond the Authority's existing contract for the Powerswitch website. We will seek an improved service through our evaluation of proposals received by prospective providers and/or by including specific requirements in the contract. We will focus on enhancements that can be incorporated into the provision of the service without the need for Code changes and do not extend procurement timelines.
- 4.9. Necessary enhancements include improving the service's usability and accessibility and establishing public-facing accountability metrics.

Enhancements through amendments to the Code

- 4.10. The Authority will also investigate further enhancements to support consumers to compare and switch that may require amendments to the Electricity Industry Participation Code 2010 (the Code).
- 4.11. The Authority will pursue (and consult on) enhancements over the next six to 12 months to facilitate greater access to retailers' plans and pricing information. This can be done by mandating retailer participation in the comparison service and standardised electricity bill information.
- 4.12. These proposals align with feedback received in the consultation and will address barriers faced by consumers, retailers, and comparison service providers.

Developing an enhancement roadmap with the future provider

- 4.13. Given the rapid development in the electricity sector, the comparison service procured by the Authority will need to be improved over time to keep up with new technologies and retail offers.
- 4.14. The Authority will seek an enhancement roadmap to be agreed upon with the future service provider.

Action 4: Broaden

- 4.15. The Authority will progress two initiatives based on the consumer choice support options proposed in the consultation paper.

Option A: Retailers provide their existing consumers with best plan information

- 4.16. The Authority will progress Option A and will develop a version of the best plan proposal.
- 4.17. Individual consumers and consumer advocacy groups strongly supported this option, and in some cases argued for there to be an “automatic” component to this proposal. In contrast, all but one retailer did not support this option citing concerns about its workability and practicability.
- 4.18. We will begin developing this proposal in greater detail, examining its potential implications, costs, and overall effectiveness as a tool to increase consumer mobility. We will consider the feedback received in this consultation and, following a policy development process, will aim to consult on options for this proposal in late 2024. A Code amendment may be required as part of this process.

Option B: Community advisers to support comparison and switching

- 4.19. The Authority will pursue an initiative to support vulnerable consumers. This option was endorsed by industry electricity consumer groups and industry during a wānanga held by the Authority in February 2024.¹
- 4.20. The proposal to endorse community advisers was supported by consumer advocates. Those in support commonly noted it would be a strong intervention that would reach vulnerable consumers. Implementation was a key concern raised about this option. Feedback encouraged the Authority to work collaboratively with existing agencies who already provide such services.
- 4.21. The Authority will host a second wānanga later this year and we look forward to working with those involved in the kaupapa to progress this initiative.

Not progressed - Option C: Promotional activity and campaigns for comparison and switching services

- 4.22. The Authority will not pursue Authority-funded promotional activity, beyond what is/will be provided for in the current and future comparison service contract.
- 4.23. Some submitters supported the idea, while others considered this option expensive and ineffective. They noted the Authority has run promotional activities in the past, which have not resulted in long-term increases in switching rates, and that these activities often don't reach those consumers who would benefit most from the messages.

The Authority will also explore ways to enhance access to data about how consumers use electricity

Submitters noted the need for greater access to data

- 4.24. Several submitters highlighted the importance of improving the data environment in which a switching service (and consumers who use that service) operate. More specifically, access to individual consumption data was said to be necessary to make significant improvements in how consumers can be empowered to make more informed choices about their electricity.

¹ Refer to the [Report on electricity consumer and industry wānanga](#)

- 4.25. Several submitters suggested the Authority should aim to resolve existing barriers to data access. Comparison service providers such as Consumer NZ, Glimp, and NZ Compare highlighted a low-data environment is a barrier for further developing the tools and services offered to consumers. Greater access to consumer data would likely drive innovation in product offerings that benefit consumers.

Improving access to data for the benefit of consumers is a key focus

- 4.26. Unlocking the use of data in the electricity market is a key strategic priority for the Authority. Facilitating consumers' access to their consumption data is vital for enhancing consumer mobility and empowering consumers to make informed choices.
- 4.27. Improving consumers' access to and usage of their own consumer data empowers them to take advantage of retail market competition. Consequently, if consumers can make more informed choices about electricity (and this leads them to compare and switch more often), this will strengthen incentives for retailers to remain competitive both in terms of pricing and innovation of their offerings.
- 4.28. The Authority recognises the significant benefits of improving consumers' access to consumption data, which can foster market competition and afford consumers agency over their own electricity usage. The consumer of the future will benefit from being more informed about the benefits of making active choices about their energy resources, including how and when they use their electricity (ie, time of use tariffs).

The Authority is investigating how access to data can be improved

- 4.29. To enable this future, the Authority has work underway to enable consumers to unlock the value of their own data. This includes investigating ways to improve access to data by both consumers and third parties (such as a switching provider), and by encouraging the development of the flexibility market through actions to encourage new innovative products and service offerings to consumers.
- 4.30. We are also working alongside other regulatory agencies to align our work with that of other regulatory reforms underway - specifically, the progression of legislation and the designation of a Consumer Data Right (CDR) for the electricity sector.

5. Additional issues raised by submitters

- 5.1. Several additional issues were raised by submitters, including accessibility barriers for disabled consumers. The Authority is considering how a website service can be made accessible for all consumers, including through accessibility requirements as part of the contract with the provider of the service.
- 5.2. Feedback on other various issues lies beyond the scope of this consultation. These include affordability of electricity, concerns about disconnection fees, the impact of metering configurations on retail plans available to consumers, regional price differences and competition issues, market testing, and carbon emissions information. While these issues are beyond the immediate scope of improving consumer switching, they are valid concerns the Authority will consider in future actions.

- 5.3. The Authority is actively working on some of these issues in other projects, including affordability and competition issues, and will consider whether further investigation on other issues is necessary in due course. The Authority will communicate progress on these areas of concern through our usual channels.

6. Next steps

- 6.1. The Authority will commence a procurement process to secure a provider of a comparison and switching service in July 2024. We will be seeking a provider of a service to begin 1 July 2025.
- 6.2. Concurrently, we will explore enhancements to be made to the service, via improving the regulatory environment in which the service operates. Specifically, we will begin workstreams aimed at:
- (a) mandating participation of retailers on the comparison service the Authority providers,
 - (b) implementing standardised electricity bill information, and
 - (c) developing options for retailers providing best plan information to consumers,
- 6.3. The Authority will continue to collaborate with Consumer NZ over the remainder of its contract term for the Powerswitch website, to ensure the service is delivering for New Zealanders, and that Consumer NZ continues to deliver against the existing development roadmap.

7. Attachments

- 7.1. The following appendices are attached to this paper:

Appendix A Summary of feedback received in submissions

Appendix A Summary of feedback received in submissions

- A.1. This appendix provides a high-level summary of feedback received in submissions, particularly a discussion of issues outside of the specific options presented by the Authority in the consultation.
- A.2. This summary is not intended to be a complete summary of submissions. The Authority has published the submissions it received to this consultation on its website.

Submissions analysis

- A.3. The Authority received 44 written submissions from submitters listed in Table 1 below.
- A.4. The Authority also received 36 substantive responses to the online questionnaire, primarily from individual consumers and Alpine Energy.

Table 1: List of submitters to the consultation paper by category

Category (number of submissions)	Submitter
Retailers (10)	ERANZ, Genesis, Meridian, Contact, Nova, Mercury, "Independent Retailers", Electric Kiwi, Flick, 2degrees
Consumer advocates (5)	Citizens Advice Bureau, Consumer Advocacy Council, Consumer NZ, Disabled Persons Assembly, Common Grace Aotearoa
Other (4)	Utilities Disputes Limited, Entrust, Ecobulb, Cortexo
Independent switching providers (2)	NZ Compare, Glimp
Individuals (5)	David Hingston, Paul Chapman, Peter Gibbard & Kevin Remmy, Neil Walbran, David Riley
Common Grace Aotearoa (18)	Individuals
Online survey submissions (36)	Individuals, Alpine Energy

Key themes

- A.5. Four main themes emerged from submitters' responses to the consultation paper. These themes encapsulate the major feedback we received from submitters, and, as such, are presented below in our summary of the feedback we received.
- A.6. These themes are:
- (a) General distrust of retailers and commercial influences on switching sites.
 - (a) Strong support for the Authority to fully fund an independent and non-commercial comparison and switching website.
 - (a) Recurring issues with the current main website (Powerswitch).
 - (b) Opportunities for improvement:

Consumers expressed dissatisfaction with the switching process

- A.7. Consumer submitters expressed a widespread belief that comparison and switching processes are confusing and difficult due to a lack of standardised information on retailer plans and tariffs (especially on power bills).
- A.8. Consumer submitters perceived the switching process as time-consuming and fraught with hidden loopholes such as exit fees and contract issues. Concerns were also raised about potential disruptions to services during the switching process.
- A.9. Regional competition and regional price differences were also reported as issues for some people. One respondent particularly noted the lack of retail electricity competition (and consequently the price of electricity) in Tauranga.

Strong support for the Authority to fully fund a comparison and switching website they perceive as independent and non-commercial.

- A.10. All consumer submitters supported the Authority's funding of a comparison and switching website (Option 4), on the basis that the Authority has a clear role to play in creating a trustworthy, credible, and non-commercial service where consumers can easily find information.
- A.11. Many submitters were sceptical of retailers' interests interfering if a more commercially focused approach is taken, such as the accreditation model of Option 3.
- A.12. Those who did not support Option 4 instead supported Option 3 or 5. Support for the Authority funding a comparison website was driven by the view that it promotes market competition and ensures a neutral, trustworthy source of information for consumers. A couple of submitters suggested that the Authority should run the website itself (as done in Australia).
- A.13. The Authority's proposed approach was supported by 17 of 18 Common Grace submissions, although this was mostly in part due to the condensed nature of the questionnaire offered by Common Grace Aotearoa. The questionnaire only asked if submitters supported the Authority's approach in general rather than asking for views on each specific option, so the Authority has taken this to mean these submitters supported all four options.

Recurrent issues with current website (Powerswitch)

- A.14. Most submitters raised existing problems with Powerswitch. Some raised that the website is difficult to use, and others raised issues ranging from inaccurate estimates to difficulties in comparing plans. Key issues raised were:

- **Website not widely known by consumers** – Many consumer submitters said that Powerswitch is not widely known as a tool to help consumers (some were unaware it existed).
- **Difficult to use** – Various submitters raised that they found the website difficult to use (mainly related to an inability to find the correct plan/pricing information). Several commented that the site often appears to show the wrong pricing (eg, does not match what's on a bill) and said there is no ability for a consumer to enter their own rates into the system along with usage data or specific energy use/heating options in the initial survey.
- **Inaccurate estimates** – Some consumer submitters found Powerswitch's estimates unhelpful, and potentially misleading, especially when considering potential savings from time of use plans. Other submissions also echoed this sentiment, particularly when comparing services that are bundled together.
- **Comparison is difficult** – Various consumer submitters felt it was very difficult to compare 'apples with apples' due to the large number and type of plans available. Multiple submitters noted that not all plans are shown on Powerswitch, which causes issues of representation and competition.
- **Infrastructure issues** – It was noted by one consumer survey respondent that some meter types are not compatible with certain types of plans, limiting consumer access to potential savings (eg, time of use plans). Access to load control options is also an issue.

Suggested opportunities for improvement

- A.15. Submitters provided various suggestions for improving a comparison service (although many referenced Powerswitch specifically), including enhancing consumer usability, adding consumption data customisation features, and improving home energy surveys.

Improved consumer usability

- A.16. Many consumer submitters raised the need for plan and pricing information to be presented in a clear standardised format by retailers (on their websites) and/or on Powerswitch.
- A.17. Plain English and non-technical language were also noted as an area for improvement to remove barriers, as well as accessibility for non-native English speakers and disabled persons. It was also proposed to include terminology around plans, such as information on what periods of 'free power' mean, and clarity on day/night rates and fixed/variable rates and what they mean.
- A.18. The need for a mobile app was raised in long-form submissions.

Consumption data

- A.19. Many submissions suggested Powerswitch would be greatly improved if consumers could add in actual consumption data and customise this to better suit individual household circumstances across the year. Consumer submitters also proposed enabling changes to plan tariffs if they do not match the plan type selected (as rates can change depending on when you signed up for a plan, etc).
- A.20. Several submitters raised the possibility of automatically using consumer data to help the switching process. This includes automatic ICP detection from the address, bulk-

loading APIs, and the ability to download consumption data to Powerswitch from a central location.

Minimum service requirements

- A.21. The introduction of Key Performance Indicators (KPIs), minimum service requirements, and/or regular audits was suggested by several long-form submitters as a means of ensuring service quality.
- A.22. Some submitters noted the current site needed clearer explanation(s) of what is done with private data entered into the website by consumers.

Additional technologies

- A.23. A few submitters suggested additional technologies that Powerswitch could adopt to improve functionality. This included the addition of a calculator or similar web-based tools to specifically show potential savings for consumers from load shifting or even investing in new technologies.
- A.24. Various submitters were interested in adding the capability to compare solar and electric vehicle (EV) plans and pricing alongside standard plan options. Others wanted to include retailer climate emission details alongside plan offerings.

Option A - Best Plan

- A.25. Most consumer submitters supported the proposal for a Code change requiring all retailers to regularly review their customers' accounts to identify the most cost-effective and appropriate plan for each customer, based on individual consumption data and needs. It was noted that some telecommunication companies already provide this service.
- A.26. Multiple submitters also suggested this option could be paired with a "standardised information" invoice.
- A.27. Most consumer submitters who supported this policy suggested that retailers should be required to offer the best plan to consumers every quarter with clear guidelines explaining why a particular plan was chosen for the individual. Other submitters suggested every six months and, in one instance, every time the retailer contacts the customer. Not all who supported this option also submitted a timeframe.
- A.28. Some submitters raised concerns about the compliance costs of this option and argued that these costs would outweigh any benefits. Several submitters advised that there is not enough evidence to support real benefits. Some submitters suggested it is difficult to define the problem.
- A.29. Three formal submitters raised the risk of incorrect recommendations, especially regarding the promotion of conditional pricing to consumers that is dependent on those consumers changing their consumption behaviour. Legal liability risks were also raised about this option.

Option B - Community Advisers

- A.30. Option B was generally supported for assisting consumers, particularly vulnerable groups, in navigating the comparison and switching process.
- A.31. Some submitters raised concerns about duplication of existing services, suggesting collaboration with existing community organisations to avoid redundancy.
- A.32. Consumer submitters provided several useful suggestions on this option. One of the survey questions specifically asked for submitters' thoughts on which existing

community organisations that this option could link into, generating a long list of potential organisations. Some supported linking this with general home energy assessments.

- A.33. Consumer submitters also provided several good suggestions on how this would function practically in terms of access (eg, private, quiet spaces in libraries or other public facilities to make it easier for people to talk/limit embarrassment; suggestion of this being a 'after hours'/late night and weekend service to help those balancing work commitments). Ecobulb and EnergyMate were mentioned as specific partners the Authority could consider.
- A.34. A few submitters suggested that advisers could also identify any breaches of the Consumer Care Guidelines and report these to the Authority.

Option C – Targeted promotional activity

- A.35. Some submitters supported the need for targeted advertising, particularly to reach vulnerable groups. Other stakeholders questioned the effectiveness and value-for-money of further advertising campaigns, given previous advertising campaigns have already been attempted and have not improved switching rates in the long term.
- A.36. Suggestions include qualitative research and targeting high-bill consumers instead of running traditionally broad advertising campaigns.

Other proposed options

- A.37. Some submitters made various additional suggestions, including standardising power bills, removing fees, meter equipment limiting a consumer's choice of plan, providing carbon emissions information, conducting market testing, and granting consumers access to real-time consumption data.
- A.38. Some submitters also suggested doing further market research to gain a better understanding of factors influencing consumers' decision to switch and to improve the data environment by providing direct consumer access to real-time consumption data.
- A.39. The Disabled Persons Assembly New Zealand submitted that information on the comparison and switching service should be accessible to those with disabilities. They also suggested that all retailers should be required to adopt the New Zealand Government Accessibility Standard.
- A.40. Researchers Peter Gibbard and Kevin Remmy highlighted that consumer procrastination is a likely cause of consumer inertia and low switching rates. They suggested a simple measure to address this could be to send a reminder to consumers who do not switch after a period of time using the comparison service.

Other issues raised

Equity issues

- A.41. Several consumer submitters noted that there are limited switching options for those with poor credit history or on debt/payment plans. Many consumer survey submitters also raised concerns about computer literacy and access to devices limiting consumers ability to compare and switch.

Cyber security and privacy concerns

- A.42. Several submissions raised concerns about how comparison and switching websites used private data. Many other submissions raised concerns how perceptions of low

cyber-security and possible privacy breaches may deter consumers from using comparison sites.

Sunk cost of investment into Powerswitch

- A.43.** Several submitters said that moving away from Powerswitch could be waste of previous investment. Some mentioned the “brand value” of Powerswitch and its existing standing within communities being important to consider.

Issues with data

- A.44.** The importance of data for comparison and switching was highlighted by many submitters. However, they also raised concerns about the current low-data environment and how this leads to a lack of accuracy of estimates for consumers. Some submitters suggested that more access to data would allow consumers more accurate and easier comparisons.

Inconsistency in bill information

- A.45.** A couple of submitters suggested that the lack of consistency in bill information limits consumers (or the website) to accurately compare the costs of bills and services.

Meter and load control device switching not considered by the Authority

- A.46.** An individual who sent a long-form submission highlighted a type of switching that the Authority did not consider as part of its analysis of rates of consumer switching – meter and load control device switching. This submitter also noted that the configuration of metering equipment may limit the choices available to a consumer.

Regional electricity pricing differences

- A.47.** A long submission from an individual living in the Tauranga region reported that their electricity prices are among the highest in the country. They raised concerns about market competition in Tauranga and the effect this has on consumer choice.

Disconnection fees

- A.48.** A submission from Common Grace Aotearoa stated that reconnection fees should be “completely eradicated”, due to their experience within their community of seeing people struggle to access food due to difficulties paying for electricity or choosing to pay for food and ending up disconnected.