

Electricity Authority independent assessments of consumer centricity, trust and confidence, and low- emissions energy 2021/22



Introduction

Each year the Authority measures its performance, the progress made in advancing our statutory objective, and how well we are delivering against our strategy.

This document summarises the high-level findings from the 2021/22 financial year's independent assessment on four Authority impact measures for the strategic ambitions of consumer centricity, trust and confidence and low emissions energy.

In 2021/22, MartinJenkins was commissioned as independent reviewers to produce the assessment. The review ran from July – August 2022 but focused on documents from 1 July 2021 through to 30 June 2022.

The assessment was conducted using a mixture of desk research, review of project documentation and supplementary information, and interviews with Authority staff.

While the Authority is taking all feedback received on board, some of the stronger themes from the independent assessments have been summarised and responded to in this cover paper.

Results of the independent assessment have been included in the Authority's Annual Report 2021/22 as part of our performance measures. The Authority uses performance measures to assess progress against the impacts (contributions) the Authority is making towards our strategic ambitions. A range of measures and data sources may be used to assess an impact. The independent assessments are used alongside internally held data and perception surveys.

The use of multiple data sources allows the Authority to consider performance from a variety of angles, and these sources work together to paint an overall picture of performance. As such, individual performance measures should be considered in the wider context of the impact to which they relate.

Results summary

MarkinJenkins reported that the Authority has tracked beyond a very good rating result, embedding consumer centricity in the work that we do, inspiring trust and confidence of industry participants and the wider market, and facilitating a sustainable affordable pathway to achieve a low emissions economy. This was a significant improvement from last year's assessments although there is still room for improvement.

The independent assessments covered the following four measures:

#	Ambition	Impact	Measure
1	Consumer centricity	Our decisions improve the way the sector meets consumers' needs	Assessment of the quality of our decision-making processes on meeting consumers' needs
2	Consumer centricity	Consumers are engaged with through our decision-making processes	Assessment of the quality of our engagement with consumers in our decision-making processes
3	Trust and confidence	The EA and our actions promote trust and confidence	Assessment of the quality of material produced (e.g. EMI reports, thought pieces)
4	Low-emissions energy	Our electricity market settings enable an efficient transition to reliable low-emissions energy in New Zealand	Assessment of the ability of market settings to facilitate an efficient transition to low-emissions energy

Consumer centricity

We received an average score of 4.25 out of 5 for measure 1, and 4.1 for measure 2.

The assessment offered a range of positive feedback, including that there was a clear noting of our ambition to keep consumers in the centre of decision-making. The assessment found the Authority has demonstrated a good understanding of vulnerable and medically-dependent consumers and domestic consumers through the Consumer Care guidelines, including what these consumers needed in the context of external pressures such as COVID-19. It also found that that timeframes for consultation were generally appropriate, given the level of complexity of the matters at hand.

MartinJenkins also identified areas of opportunity for improving consumer centricity in technical documents, for example a more explicit recognition of consumer groups and intended benefits for consumers (rather than relying on readers to make the links for themselves), and enhanced integration of the voice of domestic consumers in consultation and decision making.

Stakeholder engagement is an important part of ensuring that we put consumers front of mind in our work, and we are continuing to build this across the Authority's activities. The Authority has developed a good working relationship with the Consumer Advisory Council (CAC). Authority staff meet with the secretariat of the CAC every four weeks to exchange information about matters affecting consumers. We arrange specific briefing sessions for the CAC on work that we are undertaking. We also attend the regular meetings of the Energy Hardship Reference Group, the Electricity Retailers Association Consumer Care Working Group and Utilities Disputes. These engagements help us ensure that consumer centricity is at the forefront of our work. When we have specific projects where consumer input is important, we consult directly with consumer representative organisations such as Anglican Care and FinCap. We are working collaboratively across the Authority to ensure that insights from these engagements inform our projects, bringing in the voice of consumers and clearly articulating the benefit to them where appropriate.

Consumer centricity also applies more widely than domestic consumers. The Authority considers larger consumers, such as industrial or commercial consumers, in our consumer-centric approach. Sustained elevated prices in the spot market were a key driver of the Authority's review of competition in the wholesale electricity market. This is of particular concern to industrial and commercial consumers who are more exposed to fluctuations in the spot market.

Observations from the review included some pricing not reflecting underlying supply and demand, and increased incentives for generators to structure their offers into the market in a way that keeps prices high. In August 2022, the Authority urgently imposed a temporary restriction on very large electricity contracts that can shift market prices. This is intended to address concerns about inefficient price discrimination and consumers effectively subsidising these contracts through higher electricity prices. The Authority is consulting on a permanent solution, with submissions due in October 2022.

Trust and confidence

We received an average score of 4.2 out of 5 for measure 3.

The assessment offered a range of positive feedback, including improving our understanding of our target audience and their needs and having content that is helpful for understanding the Authority's function in most documents.

MartinJenkins also identified areas of opportunity, for example, making more active efforts to be clear on our target audience, tailoring documents in a way that is most suitable for the audience we intend to engage, and exploration of multi-audience, multi-channel content.

Separately to this report from MartinJenkins, the Authority commissioned Kantar to undertake a stakeholder perception survey earlier this year to identify areas for improvement in its communication and stakeholder engagement. Many of the areas MartinJenkins identified for improvement in the areas of trust and confidence were also identified as opportunities by stakeholders interviewed by Kantar. Those stakeholders emphasised a preference for more regular engagement opportunities, and highlighted opportunities to communicate more clearly and more regularly.

The Authority appreciates these insights as it develops better ways to communicate and engage with its broad range of stakeholders in coming months. Already, it has begun to engage more regularly through social media to encourage more informal engagement and to increase awareness of its work, and it has begun to improve the readability of content issued through its weekly newsletter Market Brief. In coming months, the Authority will be developing a communications strategy that makes it easy for our audiences to understand and engage with our work.

The Authority's website redevelopment will also support the delivery of multi-audience, multi-channel content. The new website will make it easier for people to find the content relevant to them - for instance industry or a household consumer. We are aiming for the new website to go live in March 2023.

Low emissions energy

We received an average score of 4.2 out of 5 for measure 4.

The assessment offered a range of positive feedback, with some documents showing a very clear rationale and problem definition to achieve our ambitions for low-emissions energy. The review found the Authority is consistently providing a wide range of options under our statutory powers and undertaking good engagement with electricity industry participants in joint executive on roadmap activities under the 'Energy transition roadmap'.

Again, MartinJenkins identified areas of opportunity, including engaging more broadly with other sectors on the transition pathway, more active and earlier consideration of the low-emission transition in project scoping, and clearer recognition of where trade-offs exist between strategic ambitions and our statutory objective.

The Authority is actively taking on board this feedback, with plans to engage with a broader range of stakeholders across our workstreams. This will also be taken into consideration when developing our new communications strategy. We will focus on ensuring that our ambition for low-emissions energy is front and centre when embarking on new projects. This involves making sure that our papers show a clearer recognition and articulation of any trade-off that exists between strategic ambitions and our statutory objective.

MartinJenkins report provided to the Authority

The remainder of this document contains MartinJenkins' report to the Authority. The report details the findings of the independent assessments carried out by MartinJenkins, including observations of what the Authority currently does well and opportunities for continued improvement.

INDEPENDENT ASSESSMENT OF THE ELECTRICITY AUTHORITY'S FOUR IMPACT MEASURES

Final Report

8 September 2022





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PREFACE

This report has been prepared for the Electricity Authority by Sargam Shah and Daniel Miles from MartinJenkins (Martin, Jenkins & Associates Limited).

MartinJenkins advises clients in the public, private and not-for-profit sectors. Our work in the public sector spans a wide range of central and local government agencies. We provide advice and support to clients in the following areas:

- public policy
- evaluation and research
- strategy and investment
- performance improvement and monitoring
- business improvement
- organisational improvement
- employment relations
- economic development
- financial and economic analysis.

Our aim is to provide an integrated and comprehensive response to client needs – connecting our skill sets and applying fresh thinking to lift performance.

MartinJenkins is a privately owned New Zealand limited liability company. We have offices in Wellington and Auckland. The company was established in 1993 and is governed by a Board made up of executive directors Kevin Jenkins, Michael Mills, Nick Davis, Allana Coulon, Richard Tait and Sarah Baddeley, plus independent director Sophia Gunn and chair David Prentice.



EXECUTIVE SUMMARY

This report presents the findings of an independent assessment of four of the Electricity Authority's (the Authority) impact measures focussed on their strategic ambitions of consumer centricity, trust and confidence and low emission's energy. We evaluated a selection of projects and documents produced by the Authority in the last financial year using an agreed assessment framework (developed by MartinJenkins for this purpose). The scope for this was an assessment of documents produced for the period 1 July 2021 to 30 June 2022.

An initial long list of documents was produced by the Authority, which was shortlisted independently by us to include a total of 24 documents. In producing this shortlist, we focussed on ensuring a broad range of different types of work to represent in the assessment.

The Electricity Authority's statutory objective is "to promote competition in, reliable supply by, and the efficient operation of, the electricity industry for the long-term benefit of consumers."¹

This is supplemented with strategic ambitions; consumer centricity, trust and confidence, and supporting transition to low emissions energy, along with thriving competition and innovation flourishing (which is out of scope for this assessment) to respond to changes in the environment in which the Authority operates, societal changes in Aotearoa New Zealand, and evolving global realities. The strategic ambitions and the statutory objective are complimentary and intended to reinforce each other.

In order to assess performance of the underlying measures of their ambitions, the Authority has commissioned MartinJenkins to independently consider how well the Authority executed on the three strategic ambitions and four measures in scope.

Measures

Under the consumer centricity ambition, we evaluated how the Authority focusses on consumers' needs and the impact of their decision-making on those needs being met, and on how the Authority increases participation of, and engagement with, consumers in the organisation's decision-making processes. This involved consideration of two specific impact measures:

- **Measure 1:** Assessment of the quality of the Electricity Authority's decision making on meeting consumers' needs.
- **Measure 2:** Assessment of the quality of the Electricity Authority's engagement with consumers in their decision-making processes

It is important to note, in consideration of consumer centricity, that the consumers referred to are significantly broader than what a lay person might intuitively imagine as consumers. In the context of

¹ <https://www.ea.govt.nz/about-us/what-we-do/>; see also <https://www.ea.govt.nz/assets/dms-assets/28/Statement-of-Intent-2021-2025.pdf>, p.10.



the Authority, consumers represent any consumer of electricity – including industrial processes, commercial, transport, and residential consumers.

For the trust and confidence ambition, we evaluated how the Authority's actions promote trust and confidence. This involved consideration of a third impact measure:

- **Measure 3:** Assessment of the quality of material produced

For the low emissions energy ambition, MartinJenkins evaluated how the Authority unlocks the potential for more renewable generation and set out a pathway for delivery of New Zealand's 2050 net zero target in an achievable and affordable way. We assessed the Authority's impact on enabling an efficient transition to reliable low-emissions energy through the fourth and final measure within our scope:

- **Measure 4:** Assessment of the ability of market settings to facilitate an efficient transition to low emissions energy.

Results

With an average score (out of 5) for measure 1 of 4.3, measure 2 of 4.1, measure 3 of 4.2 and measure 4 of 4.2, the Authority have tracked beyond a very good rating result in their results to embed consumer centricity in the work they do, inspire trust and confidence of industry participants, consumers and the wider market, and in facilitating a sustainable affordable pathway to achieve a low emissions economy.

We note there has been a significant improvement from last year's assessment, showing that the Authority are rising to the challenge of stewarding the system quickly as the country responds to climate change and other challenges. The Authority are doing this whilst keeping consumers' best interests front and centre in ways that warrant trust and confidence, and sustainably building a pathway for future security and reliability of the market.

Although there is still room for some improvement, the Authority have noticeably shifted towards making knowledge more accessible to the general public.

Opportunities

Several opportunities for improvement are referenced throughout this report, including:

- A more explicit recognition of consumer groups and intended benefits for consumers in more technical documents, rather than relying on them to make these connections themselves, regardless of how capable of this leap the target audience may be
- Enhanced integration of the voice of domestic consumers in consultation and decision-making, such as through active engagement with a consumer advocate, particularly during more technical consultation processes
- Exploration of multi-audience, multi-channel content, such as taking more technical content and repackaging into "what this means for you" type guides for residential or small business consumers through more accessible channels, such as social media or online videos



- Setting a clear strategy and purpose for market commentaries, which show significant promise but suffer from an unclear purpose and audience. This would help in determining their intent and could allow these to be a strong source of insight, if readers could rely on a consistent level of complexity
- More active and early consideration of low-emission transition in project scoping. In more than one instance, the problem definition for a project was implicitly updated later in the project's lifecycle to include consideration of transition to low-emission energy. While this is better than remaining inflexible, the project may have progressed differently had this been included in the problem definition upfront
- Clearer recognition of where trade-offs exist between strategic ambitions. Strategy is about priorities and can suffer where the trade-offs between strategic ambitions are not recognised. In general, most Authority documents are targeted towards those with a technical understanding of the subject, who would reasonably be able to handle explicit acknowledgement of where trade-offs exist.



INTRODUCTION

Context

Our role

The Authority undertake statutory reporting on performance, the progress made in advancing their statutory objective, and how well they are delivering against their strategy. Progress made towards their statutory objectives is assessed against outcome measures, and progress made towards their strategic ambitions is assessed against impact measures.

MartinJenkins have been commissioned to assess the Authority’s impact measures through an independent qualitative assessment on a previously agreed upon data matrix and assessment rubric to assign each measure a 1-5 rating.

We have selected a range of documents to assess each ambition and drawn further insights by 6 internally held interviews. The full list of documents selected is listed in Appendix 2, and the full list of interviewees is listed in Appendix 8.

The results from the independent assessment will be integrated into the Authority’s 2021/2022 annual report.

The Authority’s Strategy

Five key strategic ambitions focus their work, and five key strategic capabilities underpin their success.²

Table 1: The Authority’s strategic ambitions and capabilities

Strategic ambitions	Strategic capabilities
Consumer centricity	Listening and empathy
Trust and confidence	Purposeful connection
Low-emissions energy	Inspired culture
Thriving competition	Transformative mindset
Innovation flourishing	Impactful delivery

These strategic ambitions are more than aims or prioritisations tools for the Electricity Authority, they describe success and how the electricity industry can make a difference to society in Aotearoa New Zealand and to our economy and environment.

² [Statement of Intent 2021-2025.](#)



OUR APPROACH

The evaluation is focused on three strategic ambitions: consumer centricity, trust and confidence and low emissions energy, and the following measures as outlined in the Statement of Intent 2021-2025:

Ambition	Impact	Evaluation assessment focus measures	
Consumer Centricity	Our decisions improve the way the sector meets consumers' needs	1	Assessment of the quality of our decision-making processes on meeting consumers' needs
	Consumers are engaged with through our decision-making processes	2	Assessment of the quality of our engagement with consumers in our decision-making processes
Trust and Confidence	The EA and our actions promote trust and confidence	3	Assessment of the quality of material produced (e.g., EMI reports, thought pieces)
Low-emissions energy	Our electricity market settings enable an efficient transition to reliable low-emissions energy in New Zealand	4	Assessment of the ability of market settings to facilitate an efficient transition to low-emissions energy

In order to assess these measures, each has been broken down into a series of dimensions developed initially by MartinJenkins. Dimensions were based on those applied in the previous year's assessment, updated with a few changes, and finally consulted back and agreed with the Authority. No significant changes from our proposal were suggested by the Authority at any stage in that process.

Dimensions used for the assessment framework

Consumer centricity

Impact: Our decisions improve the way the sector meets consumers' needs

Measure 1: Assessment of the quality of our³ decision-making processes on meeting consumers needs

- How well are the impacted consumer groups identified?
- Are the needs of, and the potential impact on consumer groups appropriately recognised in the decision-making process?
- Is the rationale for the option(s) chosen well evidenced?

Impact: Consumers are engaged with through our decision-making processes

Measure 2: Assessment of the quality of our engagement with consumers in our decision-making processes

³ Note that where measures mention "our," this refers to the Authority as the original author of those measures, not to MartinJenkins as the author of this report.



- Is there is a clear rationale for which groups are engaged and to what extent?
- The decision-making process uses the appropriate channels and offers sufficient timeframes to engage with identified consumers
- Did the decision-making process consider a range of different consumer opinions?
- Do final decisions appropriately respond to consumer feedback?

Trust and confidence

Impact: The EA and our actions promote trust and confidence

Measure 3: Assessment of the quality of material produced (e.g., EMI reports, thought pieces)

- Is the target audience identified and understood?
- Is the level of detail and complexity appropriate for the target audience and channel of delivery?
- Is the material likely to improve the target audience's understanding of the Electricity Authority, industry, or sector?

Low emissions energy

Impact: Our electricity market settings enable an efficient transition to reliable low-emissions energy in New Zealand

Measure 4: Assessment of the ability of market settings to facilitate an efficient transition to low emissions energy

- Is there a clear problem definition related to low-emission transition?
- Are an appropriate range of options and statutory powers considered?
- Has appropriate stakeholder engagement been conducted?
- Is there an appropriate rationale set out for the option(s) chosen, and the trade-offs balance of low emission transition sustainability with other considerations clearly explained?

A full table setting out the assessments dimensions and assessment rubric is listed in Appendix 3.

Project and document selection process

The Electricity Authority compiled a list of projects and documents that were relevant outputs under the consumer centricity and trust and confidence ambitions for the 2021/22 financial year (ended 30 June 2022). A copy of the full longlist can be found in Appendix 1.

MartinJenkins then selected a sample of five projects under the consumer centricity ambition, 13 projects/documents under the trust and confidence ambition and six projects under low emissions energy to review as part of this evaluation. In selecting the specific documents, we had consideration of their length and complexity, the resource and effort which went into their production, and ensuring good coverage across all functional areas of the Authority.



The 24 projects/documents selected are listed in Appendix 2

In many cases, appraising the documents was impossible without further context and nuance; for example, to confirm the intended audience of a document. To achieve this, a series of interviews were held with Authority staff-members. A list of the interviewees is available in Appendix 8.



ASSESSMENT OF CONSUMER CENTRICITY

The Electricity Authority have placed the long-term benefit for consumers in the heart of every decision through their development of mechanisms in the market that promote competition and drive prices at an efficient level, by embracing new technology, and ensuring security and reliability in the market.

We have evaluated five projects for both the measures under consumer centricity.

Overview of selected documents

The five projects that we evaluated in this section constitute some of the most important and significant work done by the Electricity Authority in 2021/22. Below are brief descriptions of the projects assessed.

Implementation of consumer care guidelines

In 2020, the Authority undertook a purposeful and extensive collaborative review process with a range of stakeholders on existing guidelines on arrangements to assist vulnerable consumers, and medically dependent consumers. Since their publication, the Authority has then taken further steps to implement these guidelines.

Consumer care guidelines: overview for domestic consumers

This project is a guideline and overview of how domestic consumers, especially medically vulnerable or financially strained, can maximise their potential to access and afford a constant electricity suitable for their needs. It is published as an informative guide, to ensure a consistent and supportive standard of service to domestic consumers.

Final decisions on actions to correct the 2019 undesirable trading situation (UTS)

The Authority received a claim of an undesirable trading situation (UTS) on 12 December 2019 made by seven parties – Haast Energy Trading, Ecotricity, Electric Kiwi, Flick Energy, Oji Fibre, Pulse Energy Alliance and Vocus (the ‘claimants’) and decided to reset spot electricity prices to correct the undesirable trading situation.

Letter to CEs: Consumer care under COVID-19 lockdowns

James Stevenson-Wallace, in his capacity as Chief Executive, addressed electricity retailers through a brief letter encouraging ongoing support for customers during the COVID-19 virus due to potential additional financial or health pressures for many New Zealand households.

Decision on Transmission Pricing Methodology (TPM) related Code amendments

The Electricity Authority has decided to adopt a new transmission pricing methodology (TPM). The new TPM better positions New Zealand for the transition to a low-emissions economy by ensuring the better use of existing and future infrastructure, and electrification at lower cost.



What we found (Measure #1)

Efforts by the Authority to pivot towards a more consumer centric focus is apparent in the project documents. In most instances, there is a clear noting of their strategic ambition of consumer centricity, with consumers at the centre of their decision-making.

We heard this shift in perspective reinforced from internal interviews, where emphasis was placed on the impact on consumers while making decisions. We recognise the short timeframes in which the Authority operated to reduce impacts of the emerging socioeconomic, political and environmental complexities exacerbated by the COVID-19 pandemic as well, and they've been relatively successful at achieving their goal. The table below highlights the overall ratings under each of our assessment dimensions.

The table below highlights the overall ratings under each of our assessment dimensions. The full list of ratings split by documents are summarised in Appendix 4. For the purposes of this report, we have focussed on average ratings across documents for each dimension, to support a focus on potential areas for improvement (as compared to averaging across dimensions for each document).

Table 2: Assessment rating by assessment dimensions [Measure 1]

Our decisions improve the way the sector meets consumers' needs	
Overall 4.3 (rounded)	
How well are the impacted consumer groups identified?	4.4
Are the needs of, and the potential impact on, consumer groups appropriately recognised in the decision-making process?	4.4
Were an appropriate range of options considered in the decision-making process?	3.8
Is the rationale for the option(s) chosen well evidenced	4.4

How well are the impacted consumer groups identified?

Overall, we scored the included documents at 4.4 out of 5 within this dimension.

The consumer care guidelines related documents were particularly strong examples of clear identification of impacted consumer groups. There was a good understanding of who vulnerable and medically dependent consumers and other domestic consumers are, and what they needed in the context of external pressures such as COVID-19.

While generally strong, within this dimension, there is an opportunity to ground more technical documents more obviously in identified consumer groups, with the two weaker documents in this dimension being the decision on transition pricing methodology and the final decision on actions to correct the 2019 undesirable trading situation (UTS).

Are the needs of, and the potential impact on, consumer groups appropriately recognised in the decision-making process?

Overall, we scored the included documents at 4.4 out of 5 within this dimension.



The Letter to CEs regarding Consumer Care under COVID-19 lockdowns was a great example of how a brief document could effectively communicate the impacts potentially faced by consumer groups. It leveraged the consumer care guidelines (also within scope) to communicate the importance of stability of connection to power, especially for the identified vulnerable consumers and in the context of shifting needs towards working from home.

The two more technical documents considered had a relatively shallower consideration of consumer needs and impacts, with a greater reliance on more technical arguments on overall market settings. In discussions with those involved in producing these documents, there was an appropriate level of consideration of consumer impacts in making these decisions, and that their predominantly technical audience would largely have understood the relationship between the decisions taken and consumer benefits.

However, this should not be viewed as sufficient in itself. There remains value in being more explicit on how consumers will benefit from improvements, however apparent they may already be to the technically proficient target audience.

Were an appropriate range of options considered in the decision-making process?

Overall, we scored the included documents at 3.8 out of 5 within this dimension.

The Decision on TPM-related Code Amendments was a great example of considering a wide range of consumer feedback under each proposition. The decision went through a consultation process and engaged with industry participants including a big consumer voice (Pan Pac). The Authority addressed the feedback thematically and analysed perspectives, especially in the context of their statutory obligations and whether it would provide long-term benefits for consumers.

Two documents put forward for this measure, 'Overview for Domestic Consumers' and 'Letter to CEs: Consumer Care under Guidelines' – were not *per se* decision documents. They did not evidence any number of options considered in the decision-making process. Accordingly, we considered the "decision" involved to be decisions associated with the production of the product itself, with ratings supplemented by our discussions with the producers of those documents. In the case of the letter to CEs, while no other options were considered, we have not lowered the score below a three due to the significance of time pressure associated with producing that document; substantial consideration of alternate methods of communication would have lessened the value of the resulting communication.

Is the rationale for the option(s) chosen well evidenced?

Overall, we scored the included documents at 4.4 within this dimension.

Through interviews and the documents, we aimed to understand whether there was clarity of intervention logic in the decision-making process, and how the options were assessed within the Authority. As with the previous dimension, in two cases this called for consideration of the decisions involved in the document's production, rather than any decision set out in the document itself. The overarching score differs to the previous dimension primarily because, while there may not have been explicit consideration of multiple options, documents such as the 'Guide to consumer care guidelines' still had a clear rationale for the chosen option despite little consideration of other options.



What we found (Measure #2)

The Authority aims to ensure consumers were engaged throughout their decision-making processes. While engagement was more extensive in some dimensions, overall, the process was done to a proficient level. The timeframes for consultation processes in their decision making were generally appropriate, given the level of complexity of the matter at hand.

The overall quality of engagement with consumers in the Authority’s decision-making process was good, and there was clear rationale and thought behind groups engaged and the extent to which they were. However there was a noticeable deficit of residential consumer voices, largely for justified reasons, though in our view there were insufficient steps taken to capture this perspective through other means beyond direct consultation.

The table below highlights the overall ratings under each of our assessment dimensions. The full list of ratings split by documents are summarised in Appendix 5.

Table 3: Average rating by assessment dimensions [Measure 2]

Consumers are engaged with through our decision-making processes	
Overall 4.1 (rounded)	
Is there a clear rationale for which groups are engaged and to what extent?	4.2
Does the decision-making process use appropriate channels and offer sufficient timeframes to engage with identified consumers?	3.6
Did the decision-making process consider a range of different consumer opinions?	4.0
Do final decisions appropriately respond to consumer feedback?	4.4

Is there a clear rationale for which groups are engaged and to what extent?

Overall, we scored the selected documents at 4.2 out of 5 within this dimension.

A great example of having a clear rationale for engagement is the Letter to CEs on Consumer Care Guidelines. The document is addressed specifically for retailers with a clear set of actions to follow, relevant information and encourages their increased engagement with the guidelines.

Not all documents were clear on the choices involved in their engagement process, however interviews helped us better understand those choices.

A big challenge faced by the Authority across this dimension and the following were disproportionate levels of engagement by different types of consumers, particularly the lack of engagement from individual domestic consumers. For obvious reasons, larger industrial consumers are better resourced to engage, particularly where matters being engaged on are highly complex (for example, TPM code amendments). However, in our view, engagement from domestic consumers is essential to provide further clarity on the impact decision-making has on consumer needs. Options were available to fill this gap, some of which were used (such as actively engaging with academia as a proxy voice for



consumers), though we would suggest a more direct consumer voice, such as engaging an independent consumer advocate to support engagement within the Authority.

By and large, those we spoke with at the Authority agreed that more could be done and noted the establishment of the new Consumer Advocacy Council as a positive development which would support gaining a residential consumer voice on often technically complex issues.

Does the decision-making process use appropriate channels and offer sufficient timeframes to engage with identified consumers?

Overall, we scored the selected documents at 3.6 out of 5 within this dimension.

The final decisions on actions to correct the 2019 UTS was a great example of a project document using an appropriate channel and sufficient timeframes to engage with the industry for their decision-making process. The decision offered sufficient timeframes of a 6-week consultation process followed by a 3-week cross-submission period, having noted the complexity of the options in the document. Overall, the internal interviewees were satisfied with the process of consultation and confident they got enough engagement for their decision-making process.

The decision on TPM-related Code Amendments' timeframe for the consultation process was 3 weeks which in our view was potentially insufficient based on the complexity of the topic, though we note this was in the context of a 12-year long process considering transmission pricing.

The time given for consultations should ideally consider the technicality and complexity of a subject before deciding on the consultation process timeframes and strike a balance between too long a process, versus not enough time for respondents to fully consider the issues involved.

Did the decision-making process consider a range of different consumer opinions?

Overall, we scored the selected documents at 4 out of 5 within this dimension.

Throughout the decision-making process, we acknowledge the methods used by the Authority to engage parties are largely sound. Feedback tended to be addressed thematically and considered in the context of the Authority's own professional expertise on their statutory objectives, ambitions and long-term benefits for consumers.

We accept the Authority's view that they attempted to replace some missing consumer voices with internal expertise (noting that, as identified earlier, there were other unused options to directly gain feedback from those consumers). However, where using their own expertise to substitute for direct consumer feedback, there would be value in being explicit about this, and directly mentioning it alongside feedback where the Authority has drawn on its own knowledge as a proxy for consumer views.

Do final decisions appropriately respond to consumer feedback?

Overall, we scored the selected documents at 4.4 out of 5 within this dimension.

The decision papers that the Authority publishes post-consultation employ a consistent method of responding to consumer feedback. This involves grouping up feedback thematically and responding in



the context of whether it would improve advance the Authority's aims of long-term benefits for consumers, future security and reliance, transparency, and fit within the Authority's statutory obligations.

This is generally a strong approach to ensure appropriately responding to consumer feedback. Although the level of detail involved in the response may vary from technical documents to media release, there might be an opportunity to include a brief or comprehensive overview of feedback received and how the Authority responded to it. This would place further emphasis on the collaborative effort of reaching a decision and improve visibility of the consumer opinions.



ASSESSMENT OF TRUST AND CONFIDENCE

The Authority takes the position in their Statement of Intent that high levels of trust and confidence help drive action and acceptance and reduce need for intervention. As the Authority largely favours a noninterventionist facilitative approach as a regulator, they seek to build trust and confidence in the industry through greater transparency, understanding and improved behaviours.

We have assessed the quality of material produced for promoting trust and confidence with 11 selected documents which are briefly summarised below.

Overview of selected documents

Updating regulatory settings for electricity distribution networks to support the transition to a low-emissions economy

The media release discussed why the Authority is looking to update the regulatory settings for electricity distribution networks. Distribution networks have a key role to play in providing the infrastructure that connects electricity users with electricity producers and supporting low emissions energy. The update would enable consumers who start using more distributed energy resources such as solar panels, electric vehicles, and batteries to interact with the industry in a different way.

Review of the electricity industry's COVID-19 response

Mike Underhill supported the review of the industry's COVID-19 response to draw out lessons of the COVID-19 response and socialise them with the wider industry. This included specific consumer outcomes, operational lessons and collated information from a total of 25 industry leaders, consumer advocates and regulators.

Wholesale market review paper

The Electricity Authority reviewed whether electricity spot prices were determined in a competitive environment in response to the Pohokura outage. The price increase since the outage appeared to be unexplained by underlying supply and demand issues and the Authority found evidence suggesting the price may have not been determined in a competitive environment. Due to this finding, the Authority will consider the incentives on industry that allow the potential for inefficiencies in the future, along with whether the recently amended trading conduct addresses some of the issues in the review.

Investigation of an alleged breach by Genesis Energy Limited

The Authority appointed an investigator to investigate the alleged breach by Genesis in failing to offer generation for Huntly Unit 4 (HLY4) during specific trading period on 9th August 2021, this breach was alleged by 4 industry participants, Electric Kiwi Limited, Haast Energy Trading Limited, Flick Electric Limited and Switch Utilities Limited. The investigation found no breach, concluding that Genesis'



behaviour was within the realm of behaviours consistent with that of a rational generator which does not hold significant market power.

Electricity Authority's Review of competition in the wholesale electricity market raises questions about the Tiwai contracts and the cost of electricity for all consumers

This media release discusses the questions raised about the competition in the wholesale electricity market and how it affects the cost of electricity for consumers. The Authority had determined that households might effectively be paying \$200 more yearly to compensate for the price paid by the smelter. This has triggered a detailed review that sets out a set of observations about the competitiveness of the wholesale market and an issues paper discussing the observation made in the review.

Proactive release of questions and answers on the Wholesale Market Review

The Authority published answers to questions raised about the Wholesale Market Review during the consultation period, for transparency and to facilitate informed participation in the consultation process.

Powering the future

This media release discusses potential opportunities and challenges in the future security and resilience of the New Zealand power system and accompanying discussion paper to start the collaborated work programme between the Authority and the wider sector.

Our role in the energy transition

As the Government is targeting 100 percent renewable electricity generation by 2030, the Authority is playing an important role in supporting generators, retailers, distributors and the system operator to keep the lights on and transition to low emissions energy at a rapid and unprecedented rate. This project document highlights the way in which they will be facilitating the transition for future security and resilience of the electricity industry.

Market performance quarterly reviews (2021 and 2022 pages)

These documents are produced quarterly covering a broad range of topics in the electricity market to provide visibility of the regular monitoring undertaken by the Electricity Authority.

Market commentary documents:

- January prices were high due to high demand and constrained generation
- What's behind current forward prices?
- Hydro Storage: the lowdown

These market commentaries are short pieces in a more approachable tone, discussing what the Authority have been monitoring in the industry that is relevant to the industry, in order to provide more visibility of their monitoring function.

Decision on undesirable trading situation claim

This decision addresses a claim made by Haast Energy Trading, Electric Kiwi, later joined by Flick Energy (Flick Electric) and Switch Utilities (Vocus), who claim that an undesirable trading claim (UTS) occurred on 9th August 2021 in relation to six trading periods by Contact Energy and Genesis Energy. The Authority investigated further and found no UTS through a data review and a consultation process. Several reviews relating to the events of 9 August 2021 ran in parallel to, but independent of, the UTS investigation.

What we found (Measure #3)

The Authority aims to demystify the industry and trade-offs within market settings and provide commentary to increase consumer understanding of the sector. By and large, the Authority achieves this, though there are notable opportunities for improvement.

The Authority have done a good job of using clear commentary to address issues in the public eye, with a few exceptions in highly technical documents and their market commentary pieces.

The Authority would benefit from more active efforts to be clear on their target audience, and tailoring documents in a way that is most suitable for the audience they intend to engage. This is generally done on a satisfactory level, though in a few cases the documents required discussion with interviewees in order to properly understand the intended impact.

The table below highlights the overall ratings under each of our assessment dimensions. The full list of ratings split by documents are summarised in Appendix 6.

The Electricity Authority and our actions promote trust and confidence	
4.2 (rounded)	
Is the target audience identified and understood?	4.2
Is the level of detail and complexity appropriate for the target audience and channel of delivery?	4
Is the material likely to improve the target audiences' understanding of the Electricity Authority, industry, or sector?	4.5

Is the target audience identified and understood?

Overall, we have scored the selected documents at 4.2 out of 5 within this dimension.

The Authority have generally improved their understanding of the target audience and their needs from last year's assessment. The paper on 'Updating regulatory settings for electricity distribution networks' had clear call outs for consumers that were split into household consumers, business and industrial consumers.

While documents were typically produced with a target audience in mind, we note that the onus is placed on the reader to figure out whether they are in the target audience or not. Some manner of labelling could be considered to help the reader identify at a glance whether a document (or section of



the website) is intended for them or not without requiring them to engage with it – helping readers to focus on documents pitched at their level of sophistication.

Is the level of detail and complexity appropriate for the target audience and channel of delivery?

Overall, we have evaluated the selected documents at 4 out of 5 within this dimension.

This may seem, at first glance, counterintuitive. Many of the Authority's documents are reasonably complex and heavy on industry terminology and immersed in the complex environment which is the electricity market. However, the reality is that many of the documents produced by the Authority are targeted at market participants and others with significant market experience; accordingly, where this is the target audience, complex documents which do not oversimplify are consistent with the expectations and capabilities of the audience.

A perfect example of this are the investigation and claims documents (Investigation of the alleged breach by Genesis, and Decision on undesirable trading situation claim), which include technical language and display information in a way that derives value for industry participants. This is coupled with an effective glossary of abbreviations and terms to help support an audience that do not have the same level of familiarity of the industry, without making concessions within the documents themselves.

The document on 'Updating regulatory settings for Electricity Distribution Networks to support the transition to a low emissions economy' is the appropriate level of detail for a regulatory setting, however the technical detail in the document would still likely be impenetrable for a broader audience. Considering this is a document that enables the transition to low-emissions economy, it would likely be of interest to a broader audience as well.

This does not result in a poor score, however, as the document is still effective in delivering information to its target audience. Rather, this represents a missed opportunity for the Authority, where greater value could have been achieved through a multi-audience, multi-channel approach. As an example, the Authority has previously explored simple video content. In this instance, a short "what this means for you" animation could have been produced and disseminated via social media.

Is the material likely to improve the target audiences' understanding of the Electricity Authority, industry, or sector?

Overall, we have rated the selected documents at 4.5 out of 5.

Content helpful for understanding the Authority's functions is apparent in some form in most of the documents assessed. Most documents remind us explicitly of the Authority's role in the industry, their statutory obligations and their ambition to provide long-term benefits to consumers.

Across all three dimensions, the weak point in this measure were the market commentaries that we assessed ('January prices were high due to high demand and constrained generation,' 'What's behind current forward prices,' 'Hydro-storage: the lowdown').

In a way, these three documents suffer from ambition. They appear to be the consequence of an initial exploration of precisely the type of multi-audience, multi-channel strategy we suggest consideration of earlier in this chapter, repackaging content from other documents into something intended to be more

approachable, with the addition of more visualisation. However, nobody we spoke with was clear on the intended audience, and the complexity of the three were wildly inconsistent – we think it unlikely that any given reader would have gained value from all three. As a result, we think these pieces are an admirable effort at trying something new, but a clear strategy for their intended audience and level of complexity is needed before market commentaries can become a consistently useful venue for insight and understanding to that target audience.

Overall, the ability of the Authority improving the target audience’s level of understanding in the industry and sector is rated highly and noted as an area of strength in this assessment.



ASSESSMENT OF LOW EMISSIONS ENERGY

Unlocking the potential for more renewable generation is a focus area for the Authority. The Authority aims to promote a stable investment environment with robust roles and clear price signals to ensure the transition is as efficient as possible while maintaining energy security, system adaptability and affordable electricity for consumers.

We have reviewed 6 documents (mentioned below) to assess the ability of market settings to facilitate an efficient transition to low emissions energy.

Overview of selected documents

Transition to Low Emissions Energy System

As the Government is targeting 100 percent renewable electricity generation by 2030, the Authority is playing an important role in supporting generators, retailers, distributors and the system operator to keep the lights and transition to low emissions energy at a rapid and unprecedented rate of change. This project document highlights the way in which they will be facilitating the transition for future security and resilience of the electricity industry.

Energy Transition Roadmap

The Authority have collated their projects into a roadmap for decarbonising the energy system and ensuring the electricity sector is ready to meet future needs. The diagram gives visibility of the actions being taken yearly within a clear framework.

Cover paper for Roadmap

The cover paper for the roadmap is a document to support New Zealand's climate ambitions and sets out the key activities the Authority is undertaking to support that transition efficiently. The paper goes into further details of scenarios for the future and trends in sector evolution and recognises the key shifts, opportunities and challenges in the industry to support the transition.

Wholesale market competition review

The wholesale market competition review was announced in March 2021 responding to sustained elevated electricity prices since spring 2018 and focuses on the period from January 2019 to June 2021. The key observations from the review were:

- Some prices offered by electricity generators do not reflect underlying supply and demand conditions
- There is some evidence of an increased incentive and ability for electricity generators to structure their offers into the market in a way that keeps prices high (economic withholding)

- Interviews with investors indicated investment has been impacted by the uncertainty surrounding the Tiwai smelter and other factors such as the need to update resource consents for new technology

The review found that the New Zealand Aluminium Smelter (NZAS) was offered a low electricity price to encourage it to stay and this may have resulted in other consumers having to pay more.

Updating the regulatory settings for distribution networks

The Authority has looked at the range of potential regulatory options that may be needed to the regulation of distribution networks to better support the transition to a low-emissions economy and ensure long-term benefits to consumers.

The regulatory change is responding to the future of the electricity industry, where households, businesses and industrial consumers have options of producing their own electricity and participating in the electricity industry more than ever before.

Transmission Pricing Methodology (from April 2022 Decision document)

The Authority decided to adopt a new transmission pricing methodology (TPM) to better position New Zealand for the transition to a low-emissions economy. The new TPM was established in response to problems in the existing methodology, and the efficiency benefits realised in making changes to it.

What we found (Measure #4)

The Authority has rapidly streamlined their actions to align with the Government's ambition of a net-zero economy by 2030. We have found through some of the interviewees and document reviews that the other initiatives by the Authority for efficiency, competition, reliability and long-term benefits for consumers aren't mutually exclusive to achieving an efficient transition to a low-emissions economy, though some note a prioritisation of the Authority's role in 'keeping the lights on.'

The roadmaps for the transition to low-emissions energy were created in order to have visibility of all the actions taken by the Authority to better equip the industry for an efficient transition through their statutory powers. We have noted through our interviewees that the documents were created for an updated view of their focus towards low-emissions energy in a consolidated document. They have recently shifted their perspective to better align with the Government's goals and at the pace that they would need to be implemented under the constraints of their statutory powers and objectives.

The table below highlights the overall ratings under each of our assessment dimensions. The full list of ratings split by documents are summarised in Appendix 7.



Our electricity market settings enable an efficient transition to reliable low-emissions energy in New Zealand

4.2 (rounded)

Is there a clear problem definition related to low-emission transition?	4.3
Are an appropriate range of options and statutory powers considered?	4.8
Has appropriate stakeholder engagement been conducted?	4.2
Is an appropriate rationale set out for the option(s) chosen, and the trade-offs balance of low-emission transition sustainability with other considerations clearly explained?	3.7

Is there a clear problem definition related to low-emission transition?

Overall, we have rated the selected documents at 4.3 out of 5 within this dimension.

The Authority have provided a clear rationale and problem definition to achieve their objective in the 'Transition to low emissions energy system,' 'Energy transition roadmap,' and 'Cover paper for Roadmap' documents. The documents bind all the programmes they are currently running in other to facilitate a smooth transition to low emissions energy. They have gained a perfect rating for the level of clarity offered in the documents, especially noting that the programmes were often started before the Authority aligned with the Government's ambition of 100% renewable electricity generation by 2030 and net zero emissions by 2050. This is also evident in 'Updating the regulatory settings for distribution networks,' where there is a clear link in updating regulatory settings for distribution networks in response to changing behaviours amongst consumers with technology such as electric vehicles, solar power and more.

'Wholesale Market Competition Review' and 'Transmission Pricing Methodology' are more nuanced to assess. In both cases, low emission energy transition was not a core purpose at the inception of the work, but following feedback became a core consideration. We believe this speaks positively to an agile culture within the Authority able to pivot and incorporate a sustainability perspective when alerted to it - and the scores reflect this. However, it would be preferable for the Authority to have considered the low-emission transition implications earlier in the processes.

Are an appropriate range of options and statutory powers considered?

Overall, we have evaluated the selected documents at 4.8 out of 5 within this dimension.

All documents clearly consider options under their statutory powers. The consistency at which this is done solidifies their focus towards their statutory obligations. A wide range of options are carefully considered thematically from feedback against the Authority's statutory obligations in the final decision-making process showing that various perspectives were acknowledged.

Throughout their documents, they have actively sought options derived through previous work, consultations, workshops, board meetings to ensure a wide range of perspectives have been considered. Options have been considered further through cost-benefit analysis to identify the maximum benefits for consumers for 'Updating the regulatory setting for distribution networks.'

Overall, this assessment of options under statutory powers is noted as an area of strength within the Authority's operations.

Has appropriate stakeholder engagement been conducted?

Overall, we have rated the selected documents at 4.2 out of 5 within this dimension.

We have noted that the stakeholder engagement required for an efficient transition to low emissions energy is not constrained to the industry participants or consumers alone, a wider sector collaboration is needed to fully assess all the barriers to efficiency in making this shift.

Although there is great evidence of engaging industry participants in joint execution of roadmap activities under the 'Energy transition roadmap,' there is an opportunity here to engage more broadly with other sectors for the transition pathway. Activities listed in the roadmap, including the update of regulatory settings for distribution networks affects a wider audience than just industry participants and consumers. Actively seeking out consistent stakeholder engagement from other government organisations such as Energy Efficiency and Conservation Authority (EECA), MBIE, and other advocates of consumer groups through the roadmap would likely provide more insight on facilitating the transition for a low emissions economy.

The Authority generally seeks out a good level of stakeholder engagement in their decisions by engaging industry participants, hosting internal workshops, external consultation, and drawing from previous and current feedback from stakeholders. Although, there is potentially room for improvement in actively strategizing how to seek beneficial engagement to receive a wider range of perspectives from within and outside the industry.

Is an appropriate rationale set out for the option(s) chosen, and the trade-offs balance of low-emission transition sustainability with other considerations clearly explained?

Overall, we have rated the selected documents at 3.7 out of 5 within this dimension.

'Updating the regulatory settings for distribution networks' is a great example of clearly aligning low emissions economy to maintain sustainable and affordable long-term benefits to consumers. Their trade-off in this case is evidently what option provides long-term benefits for consumers, while still retaining a decent level of affordability. This level of clarity in the Authority's rationale is not prevalent in all documents.

The 'Transition to Low Emissions Energy System' sets out the rationale behind their programmes in the context of the document. The strategic ambition is aligned with facilitating transformation and enhancement of the power system to low emissions energy. There is a clear prioritisation of their focus on supporting the transition **without** compromising their future security and reliability and an acknowledgement of the challenge in navigating the pathway. We have also noted this from interviewees, and they've mentioned that under extremely challenging times, they will prioritise choosing the security of supplying electricity over the transition to low emissions energy.

We have heard some varying views through our interview process in assessing the trade-off between the statutory objectives of efficiency, affordability, security and reliance in context to transitioning to a low-emissions economy. Some do not consider them to be mutually exclusive, and some prioritise the



security of the system and affordability for consumers during challenging times over the transition to low-emissions energy. Clarifying what this means for the future, during challenging spans of time and reflecting on the potential areas of trade-offs between different statutory objectives would position the Authority better for decision-making especially during challenging spans of time and better prepare them for those circumstances.

APPENDIX 1: INITIAL LONG LIST OF DOCUMENTS

Assessment	Type	Title/Subject/Project	Link	Month published
Consumer centricity	Published material	Implementation of consumer care guidelines	https://www.ea.govt.nz/development/work-programme/operational-efficiencies/medically-dependent-consumer-and-vulnerable-consumer-guidelines/implementation/update/	Jul-21
Consumer centricity	Code amendment decision	Energy storage systems as instantaneous reserve	https://www.ea.govt.nz/development/work-programme/evolving-tech-business/batteries-as-instantaneous-reserve/	Jul-21
Trust and confidence	Media release	Updating regulatory settings for electricity distribution networks to support the transition to a low-emissions economy	https://www.ea.govt.nz/about-us/media-and-publications/media-releases/2021/updating-regulatory-settings-for-electricity-distribution-networks-to-support-the-transition-to-a-low-emissions-economy/	Jul-21
Consumer centricity	Decision	Final decision on actions to correct the 2019 UTS	https://www.ea.govt.nz/about-us/media-and-publications/media-releases/2021/authority-decides-to-reset-prices-to-correct-2019-uts/	Aug-21
Consumer centricity	Code amendment decision	Extended Reserves	https://www.ea.govt.nz/development/work-programme/risk-management/extended-reserve/development/decision-on-the-er-code-amendment/	Aug-21
Consumer centricity	Decision	Internal transfer pricing and segmented profitability reporting	https://www.ea.govt.nz/development/work-programme/risk-management/internal-transfer-pricing-and-profitability/development-2/internal-transfer-pricing-and-segmented-profitability-reporting-decision/	Aug-21
Trust and confidence	Published material	Review of the electricity industry's COVID-19 response	https://www.ea.govt.nz/about-us/media-and-publications/covid-19/review-of-the-electricity-industrys-covid19-response/	Aug-21
Consumer centricity	Published material	Letter to CEs: Consumer care under COVID-19 lockdowns	https://www.ea.govt.nz/assets/dms-assets/28/Letter-from-CE-to-Electricity-retailers-Consumer-care-under-COVID-19-lockdowns-2021-08-21.pdf	Aug-21
Trust and confidence	Media release	Authority project to explore long-term resilience and security of electricity supply	https://www.ea.govt.nz/about-us/media-and-publications/media-releases/2021/authority-project-to-explore-long-term-resilience-and-security-of-electricity-supply/	Aug-21
Trust and confidence	Media release	Media statement - 10 August 2021	https://www.ea.govt.nz/about-us/media-and-publications/media-releases/2021/media-statement-10-august-2021/	Aug-21
Trust and confidence	Media release	Electricity Authority orders review under the Electricity Industry Act 2010	https://www.ea.govt.nz/about-us/media-and-publications/media-releases/2021/electricity-authority-orders-review-under-the-electricity-industry-act-2010/	Aug-21
Trust and confidence	Media release	Authority decides to reset prices to correct 2019 UTS	https://www.ea.govt.nz/about-us/media-and-publications/media-releases/2021/authority-decides-to-reset-prices-to-correct-2019-uts/	Aug-21
Consumer centricity	Published material	Consumer care guidelines: overview for domestic consumers	https://www.ea.govt.nz/consumers/what-are-my-rights-as-an-electricity-consumer/consumer-care-guidelines/	Sep-21
Trust and confidence	Media release	Authority publishes initial review into 9 August electricity cuts	https://www.ea.govt.nz/about-us/media-and-publications/media-releases/2021/authority-publishes-initial-review-into-9-august-electricity-cuts/	Sep-21
Trust and confidence	Published material	Distribution pricing scorecards 2021	https://www.ea.govt.nz/assets/dms-assets/28/Distribution-pricing-scorecards-2021-summary-of-findings-and-key-themes.pdf	Sep-21
Trust and confidence	Published material	Wholesale market review paper	https://www.ea.govt.nz/monitoring/enquiries-reviews-and-investigations/2021/wholesale-market-competition-review-2/	Oct-21
Trust and confidence	Investigation result	Investigation of an alleged breach by Genesis Energy Limited	https://www.ea.govt.nz/assets/dms-assets/29/Authority-decision-Genesis-9-August-2021-investigation-notice-under-Regulation-29.pdf	Oct-21
Trust and confidence	Media release	Transmission Pricing Methodology ready for consultation	https://www.ea.govt.nz/about-us/media-and-publications/media-releases/2021/transmission-pricing-methodology-ready-for-consultation/	Oct-21
Trust and confidence	Media release	Electricity Authority's Review of competition in the wholesale electricity market raises questions about the Tiwai contracts and the cost of electricity for all consumers	https://www.ea.govt.nz/about-us/media-and-publications/media-releases/2021/electricity-authoritys-review-of-competition-in-the-wholesale-electricity-market-raises-questions-about-the-tiwai-contracts-and-the-cost-of-electricity-for-all-consumers/	Oct-21
Trust and confidence	Published material	Proactive release of questions and answers on the Wholesale Market Review	https://www.ea.govt.nz/monitoring/enquiries-reviews-and-investigations/2021/wholesale-market-competition-review-2/questions-and-answers/	Nov-21
Trust and confidence	Media release	Powering the future	https://www.ea.govt.nz/about-us/media-and-publications/media-releases/2021/powering-the-future/	Nov-21
Trust and confidence	Media release	Authority welcomes MBIE investigation into electricity supply interruptions of 9 August 2021	https://www.ea.govt.nz/about-us/media-and-publications/media-releases/2021/authority-response-to-mbie-investigation-into-electricity-supply-interruptions-of-9-august-2021/	Nov-21
Trust and confidence	Market Commentary	Market insight - trading and open interest update	https://www.ea.govt.nz/about-us/media-and-publications/market-commentary/market-insights/market-insight/	Nov-21
Trust and confidence	Decision	Authority's preliminary decision on the 9 August 2021 UTS claim	https://www.ea.govt.nz/code-and-compliance/uts/undesirable-trading-situations-decisions/9-august-2/	Dec-21
Consumer centricity	Industry guidance	Refreshed distribution pricing practice note published	https://www.ea.govt.nz/operations/distribution/pricing/	Dec-21
Trust and confidence	Published material	Our role in the energy transition	https://www.ea.govt.nz/development/why-we-work-on-developing-the-electricity-market/roadmap-transition-to-low-emissions-energy-system/	Dec-21
Trust and confidence	Published material	Market performance quarterly reviews (on 2021 and 2022 pages)	https://www.ea.govt.nz/monitoring/enquiries-reviews-and-investigations/	Dec-21
Trust and confidence	Media release	Authority releases preliminary decision on 9 August undesirable trading situation claim	https://www.ea.govt.nz/about-us/media-and-publications/media-releases/2021/authority-releases-preliminary-decision-on-9-august-undesirable-trading-situation-claim/	Dec-21
Trust and confidence	Investigation result	Investigations closed - settlement reached: - 6 December 2021 (Transpower)	https://www.ea.govt.nz/code-and-compliance/compliance/decisions/investigations-closed-settlement-reached/	Jan-22
Trust and confidence	Market Commentary	What's causing high prices in Jan 2022?	https://www.ea.govt.nz/about-us/media-and-publications/market-commentary/market-insights/high-wholesale-electricity-prices-in-jan-2022/	Jan-22



Assessment	Type	Title/Subject/Project	Link	Month published
Consumer centricity	Published material	Using behavioural insights to increase 'search and switch' behaviour: Piloting two letters to consumers	https://www.ea.govt.nz/assets/dms-assets/29/Using-behavioural-insights-to-increase-search-and-switch-behaviour-Final-report.pdf	Feb-22
Trust and confidence	Published material	100% Renewable electricity supply issues paper	https://www.ea.govt.nz/development/work-programme/pricing-cost-allocation/100/	Feb-22
Trust and confidence	Decision	Formal complaints - 2 November 2021 - 1 February 2022 - 12 April 2022	https://www.ea.govt.nz/code-and-compliance/compliance/decisions/formal-complaints/	Feb-22
Trust and confidence	Media release	Renewables revolution for wholesale electricity market	https://www.ea.govt.nz/about-us/media-and-publications/media-releases/2022/renewables-revolution-for-wholesale-electricity-market/	Feb-22
Trust and confidence	Market Commentary	January prices were high due to high demand and constrained generation	https://www.ea.govt.nz/about-us/media-and-publications/market-commentary/market-insights/january-prices-were-high-due-to-high-demand-and-constrained-generation/	Feb-22
Consumer centricity	Code amendment decision	Decision to amend the Code to provide for some energy storage systems to offer injectable reserve	https://www.ea.govt.nz/development/work-programme/operational-efficiencies/system-operator-documents-incorporated-into-the-code-by-reference/development/	Mar-22
Trust and confidence	Market Commentary	What's behind current forward prices?	https://www.ea.govt.nz/about-us/media-and-publications/market-commentary/market-insights/authority-insight-whats-behind-current-forward-prices/	Mar-22
Consumer centricity	Decision	TPM Decision	https://www.ea.govt.nz/development/work-programme/pricing-cost-allocation/transmission-pricing-review/development/final-tpm-decision/	Apr-22
Consumer centricity	Decision	9 August Phase 2 review report	https://www.ea.govt.nz/monitoring/enquiries-reviews-and-investigations/2021/electricity-authority-review-of-9-august-2021-event-under-the-electricity-industry-act-2010/	Apr-22
Trust and confidence	Market Commentary	Hydro Storage: the lowdown	https://www.ea.govt.nz/about-us/media-and-publications/market-commentary/market-insights/hydro-storage-the-low-down/	Apr-22
Trust and confidence	Published material	Wholesale electricity market competition review - proactive release of correspondence	https://www.ea.govt.nz/about-us/media-and-publications/proactive-release/	Apr-22
Trust and confidence	Media release	Better transmission pricing supports our low-emissions future	https://www.ea.govt.nz/about-us/media-and-publications/media-releases/2022/better-transmission-pricing-supports-our-low-emissions-future/	Apr-22
Trust and confidence	Media release	Authority's final review maintains Transpower's errors led to 9 August power cuts	https://www.ea.govt.nz/about-us/media-and-publications/media-releases/2022/authoritys-final-review-maintains-transpowers-errors-led-to-9-august-power-cuts/	Apr-22
Trust and confidence	Post-implementation review	Post-implementation review of the guidelines for communication about price changes	https://www.ea.govt.nz/monitoring/enquiries-reviews-and-investigations/2022/post-implementation-review-of-the-guidelines-for-communication-about-price-changes/	Apr-22
Trust and confidence	Published material	Distributed Energy Resources CBA model	https://www.ea.govt.nz/development/work-programme/evolving-tech-business/updating-regulatory-settings-for-distribution-networks/	May-22
Consumer centricity	Code amendment decision	Decision on TPM-related Code amendments	https://www.ea.govt.nz/development/work-programme/pricing-cost-allocation/transmission-pricing-review/development/decision-on-tpm-related-code-amendments/	Jun-22
Trust and confidence	Decision	Decision on undesirable trading situation claim	https://www.ea.govt.nz/code-and-compliance/uts/undesirable-trading-situations-decisions/9-august-2/	Jun-22
Trust and confidence	Issues paper	Financial Transmission Rights market observations	https://www.ea.govt.nz/development/work-programme/risk-management/hedge-market-development/consultations/#c19182	Jun-22
Trust and confidence	Media release	Electricity Authority decides no undesirable trading situation on 9 August 2021	https://www.ea.govt.nz/about-us/media-and-publications/media-releases/2022/electricity-authority-decides-no-undesirable-trading-situation-on-9-august-2021/	Jun-22
Trust and confidence	Market Commentary	Prices fall as more rain and wind remind us winter is here	https://www.ea.govt.nz/about-us/media-and-publications/market-commentary/market-insights/hydro-storage-the-low-down-2/	Jun-22
Trust and confidence	Published material	Weekly market monitoring (organised by calendar years)	https://www.ea.govt.nz/monitoring/market-performance-and-analysis/monitoring-trading-conduct/	Jun-21
Trust and confidence	Investigation result	Investigations closed - no settlement reached: - 2 September 2021 (Trustpower) - 10 September 2021 (Advanced Metering Services) - 6 December 2021 (Transpower as grid owner) - 28 February 2022 (Genesis)	https://www.ea.govt.nz/code-and-compliance/compliance/decisions/investigations-closed-no-settlement-reached/	Jun-22
Trust and confidence	Social media post	Regular tweets on key monitoring insights	https://twitter.com/ElectricityAuth	
Trust and confidence	Social media post	Regular LinkedIn posts on Authority activity and monitoring insights	https://www.linkedin.com/company/electricity-authority-of-new-zealand	
Trust and confidence	EMI Pre-existing	Pre-existing base of EMI reports and dynamic content (go light touch)	https://www.emi.ea.govt.nz/	
Low-emissions energy	Published material	Transition to Low Emissions Energy System	https://www.ea.govt.nz/development/why-we-work-on-developing-the-electricity-market/roadmap-transition-to-low-emissions-energy-system/	Dec-21
Low-emissions energy	Published material	Energy Transition Roadmap	https://www.ea.govt.nz/assets/dms-assets/29/Roadmap-Transition-to-Low-Emissions-Energy-System-v1.0.pdf	Dec-21
Low-emissions energy	Published material	Cover paper for Roadmap	https://www.ea.govt.nz/assets/dms-assets/29/Authority-cover-paper-for-roadmap.pdf	Dec-21
Low-emissions energy	Transformational projects	Wholes market competition review	https://www.ea.govt.nz/monitoring/enquiries-reviews-and-investigations/2021/wholesale-market-competition-review-2/	Nov-21
Low-emissions energy	Transformational projects	MDAG 100% renewables project	https://www.ea.govt.nz/development/advisory-technical-groups/mdag/mdag-price-discovery-project/#:~:text=The%20Market%20Development%20Advisory%20Group,100%20percent%20renewable%20electricity%20supply.	Aug-21



Assessment	Type	Title/Subject/Project	Link	Month published
Low-emissions energy	Consultation	MDAG 100% renewables project - MDAG issues discussion paper	https://www.ea.govt.nz/development/work-programme/pricing-cost-allocation/100/consultations/#c19134	
Low-emissions energy	Transformational projects	Updating the regulatory settings for distribution networks	https://www.ea.govt.nz/development/work-programme/evolving-tech-business/updating-regulatory-settings-for-distribution-networks/	
Low-emissions energy	Transformational projects	Future security and resilience	https://www.ea.govt.nz/development/work-programme/risk-management/future-security-and-resilience-project/	
Low-emissions energy	Transformational projects	Transmission Pricing Methodology (from April 2022 Decision document)	https://www.ea.govt.nz/development/work-programme/pricing-cost-allocation/transmission-pricing-review/	



APPENDIX 2: SHORTLISTED DOCUMENTS

Business Unit	Strategic goal	Type	Title/Subject/Project	Link	Month published
Policy	Consumer centricity	Published material	Implementation of consumer care guidelines	https://www.ea.govt.nz/development/work-programme/operational-efficiencies/medically-dependent-consumer-and-vulnerable-consumer-guidelines/implementation/update/	Jul-21
Policy / Communications	Trust and confidence	Media release	Updating regulatory settings for electricity distribution networks to support the transition to a low-emissions economy	https://www.ea.govt.nz/about-us/media-and-publications/media-releases/2021/updates-regulatory-settings-for-electricity-distribution-networks-to-support-the-transition-to-a-low-emissions-economy/	Jul-21
Legal, Monitoring & Compliance	Consumer centricity	Decision	Final decision on actions to correct the 2019 UTS	https://www.ea.govt.nz/about-us/media-and-publications/media-releases/2021/authority-decides-to-reset-prices-to-correct-2019-uts/	Aug-21
Strategy	Trust and confidence	Published material	Review of the electricity industry's COVID-19 response	https://www.ea.govt.nz/about-us/media-and-publications/covid-19/review-of-the-electricity-industrys-covid19-response/	Aug-21
Communications	Consumer centricity	Published material	Letter to CEs: Consumer care under COVID-19 lockdowns	https://www.ea.govt.nz/assets/dms-assets/28/Letter-from-CE-to-Electricity-retailers-Consumer-care-under-COVID-19-lockdowns-2021-08-21.pdf	Aug-21
Policy / Communications	Consumer centricity	Published material	Consumer care guidelines: overview for domestic consumers	https://www.ea.govt.nz/consumers/what-are-my-rights-as-an-electricity-consumer/consumer-care-guidelines/	Sep-21
Policy	Trust and confidence	Published material	Wholesale market review paper	https://www.ea.govt.nz/monitoring/enquiries-reviews-and-investigations/2021/wholesale-market-competition-review-2/	Oct-21
Legal, Monitoring & Compliance	Trust and confidence	Investigation result	Investigation of an alleged breach by Genesis Energy Limited	https://www.ea.govt.nz/assets/dms-assets/29/Authority-decision-Genesis-9-August-2021-investigation-notice-under-Regulation-29.pdf	Oct-21
Policy / Communications	Trust and confidence	Media release	Electricity Authority's Review of competition in the wholesale electricity market raises questions about the Tiwai contracts and the cost of electricity for all consumers	https://www.ea.govt.nz/about-us/media-and-publications/media-releases/2021/electricity-authoritys-review-of-competition-in-the-wholesale-electricity-market-raises-questions-about-the-tiwai-contracts-and-the-cost-of-electricity-for-all-consumers/	Oct-21
Policy	Trust and confidence	Published material	Proactive release of questions and answers on the Wholesale Market Review	https://www.ea.govt.nz/monitoring/enquiries-reviews-and-investigations/2021/wholesale-market-competition-review-2/questions-and-answers/	Nov-21
Strategy	Trust and confidence	Media release	Powering the future	https://www.ea.govt.nz/about-us/media-and-publications/media-releases/2021/powering-the-future/	Nov-21
Strategy	Trust and confidence	Published material	Our role in the energy transition	https://www.ea.govt.nz/development/why-we-work-on-developing-the-electricity-market/roadmap-transition-to-low-emissions-energy-system/	Dec-21
Legal, Monitoring & Compliance	Trust and confidence	Published material	Market performance quarterly reviews (2021 and 2022 pages)	https://www.ea.govt.nz/monitoring/enquiries-reviews-and-investigations/	Dec-21
Legal, Monitoring & Compliance / Communications	Trust and confidence	Market Commentary	January prices were high due to high demand and constrained generation	https://www.ea.govt.nz/about-us/media-and-publications/market-commentary/market-insights/january-prices-were-high-due-to-high-demand-and-constrained-generation/	Feb-22
Legal, Monitoring & Compliance / Communications	Trust and confidence	Market Commentary	What's behind current forward prices?	https://www.ea.govt.nz/about-us/media-and-publications/market-commentary/market-insights/authority-insight-whats-behind-current-forward-prices/	Mar-22
Legal, Monitoring & Compliance / Communications	Trust and confidence	Market Commentary	Hydro Storage: the lowdown	https://www.ea.govt.nz/about-us/media-and-publications/market-commentary/market-insights/hydro-storage-the-low-down/	Apr-22
Legal, Monitoring & Compliance	Trust and confidence	Decision	Decision on undesirable trading situation claim	https://www.ea.govt.nz/code-and-compliance/uts/undesirable-trading-situations-decisions/9-august-2/	Jun-22
Network Pricing / Policy	Consumer centricity	Code amendment decision	Decision on TPM-related Code amendments	https://www.ea.govt.nz/development/work-programme/pricing-cost-allocation/transmission-pricing-review/development/decision-on-tpm-related-code-amendments/	Jun-22



Business Unit	Strategic goal	Type	Title/Subject/Project	Link	Month published
Strategy	Low-emissions energy	Published material	Transition to Low Emissions Energy System	https://www.ea.govt.nz/development/why-we-work-on-developing-the-electricity-market/roadmap-transition-to-low-emissions-energy-system/	-
Strategy	Low-emissions energy	Published material	Energy Transition Roadmap	https://www.ea.govt.nz/assets/dms-assets/29/Roadmap-Transition-to-Low-Emissions-Energy-System-v1.0.pdf	-
Strategy	Low-emissions energy	Published material	Cover paper for Roadmap	https://www.ea.govt.nz/assets/dms-assets/29/Authority-cover-paper-for-roadmap.pdf	-
Policy	Low-emissions energy	Transformational projects	Wholes market competition review	https://www.ea.govt.nz/monitoring/enquiries-reviews-and-investigations/2021/wholesale-market-competition-review-2/	-
Policy	Low-emissions energy	Transformational projects	Updating the regulatory settings for distribution networks	https://www.ea.govt.nz/development/work-programme/evolving-tech-business/updating-regulatory-settings-for-distribution-networks/	-
Network Pricing	Low-emissions energy	Transformational projects	Transmission Pricing Methodology (from April 2022 Decision document)	https://www.ea.govt.nz/development/work-programme/pricing-cost-allocation/transmission-pricing-review/	-



APPENDIX 3: ASSESSMENT DIMENSIONS AND RUBRIC

Ambition	Measure	Dimension	Assessment rubric						
			1	2	3	4	5		
Consumer centricity	Assessment of the quality of our decision-making processes on meeting consumers' needs	How well are the impacted consumer groups identified?	No impacted consumer groups are identified	-	Some impacted consumer groups are identified	-	A comprehensive set of impacted consumer groups are identified		
		Are the needs of, and the potential impact on, consumer groups appropriately recognised in the decision-making process?	No evidence of consideration of the needs of and impact on consumer groups	-	Some evidence of consideration of the needs of and impact on consumer groups	-	Comprehensive consideration of the needs of and impact on consumer groups		
		Were an appropriate range of options considered in the decision-making process?	No evidence of options considered or available under the Electricity Authority's statutory powers	-	Some evidence of options considered or available under the Electricity Authority's statutory powers	-	Comprehensive consideration of options available		
		Is the rationale for the option(s) chosen well evidenced?	The chosen option is not supported by a rationale and intervention logic	-	The chosen option is supported by some rationale and intervention logic	-	The chosen option is supported by a comprehensive rationale and intervention logic		
	Assessment of the quality of our engagement with consumers in our decision-making processes	Is there a clear rationale for which groups are engaged and to what extent?	No rationale for groups engaged, or no engagement	-	Some rationale for groups engaged	-	Clear rationale for the groups engaged and the extent to which they were.		
		The decision-making process uses the appropriate channels and offers sufficient timeframes to engage with identified consumers	Channel and timeframes inappropriate for engagement with identified consumers	-	Channel and timeframes suitable for engagement with identified consumers	-	Channel and timeframes actively support robust engagement with identified consumers		
		Did the decision-making process consider a range of different consumer opinions?	The decision-making process does not consider a range of differing consumer opinions	-	The decision-making process considers a decent range of differing consumer opinions	-	The decision-making process considers a large range of differing consumer opinions		
		Do final decisions appropriately respond to consumer feedback?	The final decisions respond to no consumer feedback	-	The final decisions respond to some consumer feedback	-	The final decisions respond to a comprehensive amount of consumer feedback		
		Trust and confidence	Assessment of the quality of material produced (e.g., EMI reports, thought pieces)	Is the target audience identified and understood?	The target audience is not actively identified and understood	-	The target audience is somewhat identified and understood	-	The target audience is well identified and understood
				Is the level of detail and complexity appropriate for the target audience and channel of delivery?	There is no clear relationship between the level of detail and complexity, and the target audience and channel of delivery	-	There is a clear relationship between the level of detail and complexity, and the target audience and channel of delivery	--	The level of detail and complexity is tailored specifically to the target audience and channel of delivery
Is the material likely to improve the target audiences' understanding of the Electricity Authority, industry, or sector?	The material is unlikely to improve the target audiences' understanding of the Electricity Authority, industry, or sector			-	The material likely to somewhat improve the target audiences' understanding of the Electricity Authority, industry, or sector	-	The material is highly likely to significantly improve the target audiences' understanding of the Electricity Authority, industry, or sector		
Low Emissions Energy	Assessment of the ability of market settings to facilitate an efficient transition to low-emissions energy	Is there a clear problem definition related to low-emission transition?	The problem definition is unrelated to low-emission transition.	-	The problem definition is related to low-emissions transition	-	The problem definition is clearly and significantly related to low emissions transition		
		Are an appropriate range of options and statutory powers considered?	There are no options identified	-	There are some options identified	-	There are a comprehensive set of options identified		
		Has appropriate stakeholder engagement been conducted?	No stakeholder engagement has been conducted	-	Some stakeholder engagement has been conducted	-	A comprehensive level of stakeholder engagement has been conducted		
		Is an appropriate rationale set out for the option(s) chosen, and the trade-offs balance of low-emission transition sustainability with other considerations clearly explained?	No clarity is provided in the rationale set out for the option(s) chosen and no considerations for the balance of sustainability are explained	-	Some clarity is provided in the rationale set out for the option(s) chosen, with and some considerations for the balance of sustainability are explained	-	Clarity is provided in the rationale set out for the option(s) chosen, with strong evidence of consideration of the trade-offs involved in low-emission transition. and there is a clear explanation for the balance of sustainability.		



APPENDIX 4: SUMMARY ASSESSMENT OF CONSUMER CENTRICITY: [MEASURE 1]

Table 4: Assessment dimensions and rubric [Assessment of the quality of the Electricity Authority’s decision making on meeting consumer needs]

Dimension	Rating				
	1	2	3	4	5
How well are the impacted consumer groups identified?	No impacted consumer groups are identified	-	Some impacted consumer groups are identified	-	A comprehensive set of impacted consumer groups are identified
Are the needs of, and the potential impact on, consumer groups appropriately recognised in the decision-making process?	No evidence of consideration of the needs of and impact on consumer groups	-	Some evidence of consideration of the needs of and impact on consumer groups	-	Comprehensive consideration of the needs of and impact on consumer groups
Were an appropriate range of options considered in the decision-making process?	No evidence of options considered or available under the Electricity Authority’s statutory powers	-	Some evidence of options considered or available under the Electricity Authority’s statutory powers	-	Comprehensive consideration of options available
Is the rationale for the option(s) chosen well evidenced?	The chosen option is not supported by a rationale and intervention logic	-	The chosen option is supported by some rationale and intervention logic	-	The chosen option is supported by a comprehensive rationale and intervention logic

Table 5: Summary rating [Assessment of the quality of the Electricity Authority’s decision making on meeting consumer needs]

Document	How well are the impacted consumer groups identified?	Are the needs of, and the potential impact on, consumer groups appropriately recognised in the decision-making process?	Were an appropriate range of options considered in the decision-making process?	Is the rationale for the option(s) chosen well evidenced?	Overall
Implementation of consumer care guidelines	5 – Vulnerable, medically dependent, and domestic consumers and retailers are clearly and consistently highlighted in the consumer care guidelines.	5 – An appropriate level of stakeholder engagement via webinars, workshops and consultation processes was taken place while updating the previous consumer guidelines	4 – Evidence of a collaborative approach to decision-making and implementation. Collaboration with Utilities Disputes and MBIE around energy hardship issues.	4 – Clear rationale provided for intervention and to appropriately brief the consumers on how the guidelines have progressed.	4.5
Final decisions on actions to correct the 2019 UTS	4 – Industry participants impacts are grouped, and domestic/residential consumers impacts briefly mentioned.	4 – There is a mention on monetary impacts on residential consumers and the individual participants specific to generation. The impacts aren’t clearly listed, though this is potentially due to the nature of the project document (media release).	4 – Notes for editors mentions the rationale behind the decision after investigation and how it fits within their statutory objectives. However, this could have been clarified as part of the introduction in the media release.	4 – There is clear evidence of rationale behind choosing options based on feedback and engagement with NZX and Transpower. It also aligns with their statutory objectives.	4
Letter to CEs: Consumer care under COVID-19 lockdowns	5 – Clearly set out groups of consumers, in the context of definitions supplied in the consumer care guidelines	5 – Leverages the guidelines to set out the importance of not disconnecting, particularly given the shift to work from home	3 – No evidence of other options outside of the letter considered, though this is balanced with clear time pressure to act	4 – Clear rationale for a rapid intervention to support retailers to appropriately implement the guidelines during the lockdowns	4.3
Consumer care guidelines: overview for domestic consumers	5 – Overview specifically for domestic consumers and defines the different definition of consumers.	5 – Needs of and potential impacts on consumer groups is identified comprehensively.	3 – No evidence of options considered in the decision-making process although this is aligned with the type of document (information booklet/guideline overview)	5 – Clear rationale to provide an informative booklet for domestic consumers to support them in accessing a constant electricity supply for their needs	4.5
Decision on TPM-related Code amendments	3 – The impacted consumer groups were not identified explicitly in the decision documents.	3 – The decision documents lacked the impact or benefit specifically on consumer groups (industry participants) with the change. Note that this is separate from the fact that the amendment promotes the Authority’s statutory objective, and the impact on Transpower.	5 – Submitters views were considered under each proposition of the decision and assessed by the Authority.	5 – Analysis done on benefits of Code change versus voluntary information provision. There is a good reasoning behind accepting or rejecting submitters views.	4
Overall	4.4	4.4	3.8	4.4	4.25



APPENDIX 5: SUMMARY ASSESSMENT FOR CONSUMER CENTRICITY: [MEASURE 2]

Table 6: Assessment dimensions and rubric [Assessment of the quality of engagement with consumers in decision-making processes]

Dimension	Rating				
	1	2	3	4	5
Is there is a clear rationale for which groups are engaged and to what extent?	No rationale for groups engaged, or no engagement	-	Some rationale for groups engaged	-	Clear rationale for the groups engaged and the extent to which they were.
Does the decision-making process use appropriate channels and offer sufficient timeframes to engage with identified consumers?	Channel and timeframes inappropriate for engagement with identified consumers	-	Channel and timeframes suitable for engagement with identified consumers	-	Channel and timeframes actively support robust engagement with identified consumers
Did the decision-making process consider a range of different consumer opinions?	The decision-making process does not consider a range of differing consumer opinions	-	The decision-making process considers a decent range of differing consumer opinions	-	The decision-making process considers a large range of differing consumer opinions
Do final decisions appropriately respond to consumer feedback?	The final decisions respond to no consumer feedback	-	The final decisions respond to some consumer feedback	-	The final decisions respond to a comprehensive amount of consumer feedback

Table 7: Summary rating [Assessment of the quality of engagement with consumers in decision-making processes]

Document	Is there is a clear rationale for which groups are engaged and to what extent?	Does the decision-making process use appropriate channels and offer sufficient timeframes to engage with identified consumers?	Did the decision-making process consider a range of different consumer opinions?	Do final decisions appropriately respond to consumer feedback?	Overall
Implementation of consumer care guidelines	4 – A clear rationale for engaging Utilities Disputes to understand domestic consumer complaints, and MBIE for energy hardship. Retailers are engaged through consultation to design the new guidelines.	4 – There is evidence of two consultation processes, along with workshops with financial mentors but the second consultation (technical consultation) had a relatively short timeframe of two weeks. It is noted that this is not an appropriate channel for domestic consumer voices.	5 – There is clear evidence that a range of different consumer opinions have been considered, including engaging with MBIE for wider energy hardship issues.	4 – Evidence of appropriate responses to consumer feedback in the draft decision papers, although not mentioned in the final decision document. The draft decision paper themes and summarises feedback received (that document is out of scope as it was released in February 2021)	4.3
Final decisions on actions to correct the 2019 UTS	4 – Clearly targeted towards industry participants as they face the highest impacts, and NZX and Transpower are engaged for implementation. The submitters in the media release aren't explicitly highlighted in this media release – although this is balanced with the type of project document it is.	5 – Consultation process for proposed actions to correct 2019 UTS gave sufficient time for consultation noting the complexity of the options – with a 6-week consultation process followed by a 3-week cross-submission period.	4 – The Authority mentions the consultation document that canvassed the various options and shows clear consideration of submitter's opinions on best actions.	5 – The media release alludes to the fact that the feedback was analysed and includes examples of responding to the feedback. In detailed consultation documents, the feedback was thematically broken down based on whether it focuses to correct future UTS or whether it is focused on correcting 2019 UTS.	4.5
Letter to CEs: Consumer care under COVID-19 lockdowns	5 – Chief Executives of industry participants are clearly addressed in the letter.	4 – Used an appropriate channel to brief CEs under significant time pressure related to the pandemic.	3 – No evidence of consideration of different consumer opinions, however it is noted that this is a brief letter under significant time-pressure.	4 – The final decision and guideline highlighted in the letter reflects the urgency of the action requested by the Authority during the pandemic, which was appropriate for the time.	4
Consumer care guidelines: overview for domestic consumers	5 – Clear rationale for groups engaged, e.g., domestic consumers, utilities dispute for complaints, and other helpful organisations helpful for domestic consumers	2 – Domestic consumers don't interact often with the channel used to publish this document. Other interview insights have noted direct engagement with domestic consumers to be a challenge.	3 – There is evidence under Consumer Guidelines that Utilities Disputes complaints have made way into the decision-making of the document. Although, this is not explicitly mentioned in this document.	4 – The document being a guideline for consumers does not include the response to consumer feedback. Although, there is evidence of this under the guideline for retailers.	3.5
Decision on TPM-related Code amendments	3 – The consultation isn't explicit about which parties it engages, however interview insights state that consultation processes are designed a certain way to prompt parties to participate.	3 – Used an appropriate channel to engage with Transpower and industry participants. The consultation period of 3 weeks might be insufficient based on the complexity of the TPM Code Amendment.	5 – The decision-making process considered a comprehensive range of different consumer opinions (generators, distribution, transmission, consumer, and retailer)	5 – The final decisions appropriately responded to submissions feedback under each proposed change and followed a good structure of accepting and rejecting recommendations	4
Overall	4.2	3.6	4	4.4	4.1



APPENDIX 6: SUMMARY ASSESSMENT OF TRUST AND CONFIDENCE: [MEASURE 3]

Table 8: Assessment rubric and dimensions [Assessment rating on the ability of market settings to facilitate an efficient transition to low-emissions energy]

Dimension	Rating				
	1	2	3	4	5
Is the target audience identified and understood?	The target audience is not actively identified and understood		The target audience is somewhat identified and understood		The target audience is well identified and understood
Is the level of detail and complexity appropriate for the target audience and channel of delivery?	There is no clear relationship between the level of detail and complexity, and the target audience and channel of delivery	-	There is a clear relationship between the level of detail and complexity, and the target audience and channel of delivery	--	The level of detail and complexity is tailored specifically to the target audience and channel of delivery
Is the material likely to improve the target audiences' understanding of the Electricity Authority, industry, or sector?	The material is unlikely to improve the target audiences' understanding of the Electricity Authority, industry, or sector	-	The material likely to somewhat improve the target audiences' understanding of the Electricity Authority, industry, or sector	-	The material is highly likely to significantly improve the target audiences' understanding of the Electricity Authority, industry, or sector

Table 9: Summary rating [Assessment rating on the ability of market settings to facilitate an efficient transition to low-emissions energy]

Document	Is the target audience identified and understood?	Is the level of detail and complexity appropriate for the target audience and channel of delivery?	Is the material likely to improve the target audiences' understanding of the Electricity Authority, industry, or sector?	Overall
Updating regulatory settings for electricity distribution networks to support the transition to a low-emissions economy	4 – Household, business and industrial consumers identified. The report explains parties impacted but has an opportunity to bring further clarity on how new regulatory settings affects network providers if DER is adopted widely apart from encouraging competition and greater innovation.	4 – The level of detail and complexity is appropriate for a regulatory setting, there is consistency in language used and definitions provided. This might still alienate domestic, business and household consumers.	5 – Very likely to improve the audiences' understanding of the Authority, industry, and sector. Tables and diagrams add context to the piece, and explain regulatory levers, roles, and impacts clearly.	4.3
Review of the electricity industry's COVID-19 response	4 - Directed towards general/wider industry and their concerns are understood. Limited explanation of what this review considers "vulnerable consumers" are (note: this is explicitly defined in other documents).	3 – Although the channel of delivery seems apt for general industry participants, there are some inconsistencies in the level of detail provided, an acronym not defined first hand (EDB's).	4 – The design of the document and the segments improve the knowledge of the Authority's role in the industry, or the sector, but less than it focuses on lessons from the pandemic. Note that the target audience mentioned is the wider industry and not just the Electricity Industry participants.	3.6
Wholesale market review paper	4 – Target audience is well defined as generators and large consumers, and the needs are understood by addressing the Authority's focus to protect long term interests of electricity consumers and increasing efficiency between generators and large consumers.	5 – The level of detail and complexity and the channel of delivery (through consultation) is appropriate to engage the industry participants	5 – Material improves the industry participants understanding of the role the Authority play in ensuring competitiveness in the industry. Background context is provided to explain the reason for intervention.	4.6
Investigation of an alleged breach by Genesis Energy Limited	5 – Clear target audience of the company they're investigating and other industry participants that could learn from the decisions. Not for consumers, but this is a deliberate and justified choice.	5 – Not expected to reach non-subject matter experts, and hence the level of detail and complexity is appropriate for the use of Genesis, and other industry participants willing to take lessons out of the investigation.	4 – This is likely to improve Genesis's understanding of the Authority's role in compliance, although the Authority could have gone further in taking out lessons from investigations within the industry.	4.6
Electricity Authority's Review of competition in the wholesale electricity market raises questions about the Tiwai contracts and the cost of electricity for all consumers	5 – Clear understanding of the target audience being the wider public, directed towards the long-term interest of consumers. The Authority have a hypothetical layperson that they target their public documents at a national level (supported by interview insights).	4 – Appropriate level of detail for the general public. Plain language and acronyms are explained. Although the channel of delivery is not the best for wider engagement. This issue is highlighted in other assessments as well.	5 – The media release by itself highlights the issue with the structure of the wholesale electricity market, and the review papers are well summarised in the notes, and the logic behind the review is explained. The Authority's role is explained, along with the impact on the sector for consumers.	4.6
Proactive release of questions and answers on the Wholesale Market Review	4 – The target audience in the document is not specified. Although, it is made clear that it's intended for technical industry participants through the document style and the interview insights.	4 – Good level of detail and complexity to engage technical industry participants. Drafted in a technical process internally before it was sent over to communications to be published.	5 – The document answers technical questions appropriately and further clarify the review of the wholesale market for industry participants.	4.3
Powering the future	4 – Interviews have clarified that the target audience in mind for media releases are the general public, and language used to address powering the future is clear and easily digestible.	4 – The channel of delivery is not suitable for high amounts of consumer engagement, and this is a recurring problem with getting wider engagement for the Authority (highlighted by interviews). Although, the high level of information is apt for wider understanding of the state of affairs.	5 – The material is likely to improve the general audience's understanding of the issues faced with rising consumer demand, how the Authority engages with many different players in the sector and an understanding of what their role is.	4.3
Our role in the energy transition	4 – Targeted towards a wider and more general audience and industry participants.	4 - Provides a good high-level brief of work underway with little to no complexity and aligns with the wider target audience. A good overview for industry participants as well.	5 - Provides a good overview of things under in the transition to low emissions energy for technical industry participants as well as the general audience and improves the understanding of what the Authority can do for the transition within its statutory powers.	4.3
Market performance quarterly reviews (2021 and 2022 pages)	5 – Not explicitly mentioned, although the intended audience of the industry and its participants is clear through the document style,	5 – Information is provided at the level of detail most relevant for participants to understand the state of the industry over a quarter. The channel of delivery is adequate to reach industry participants.	4 – There is some variation on how well the material would improve the industry participant's understanding of the sector, although the Authority's role of monitoring the sector is highlighted in the report.	4.6



Document	Is the target audience identified and understood?	Is the level of detail and complexity appropriate for the target audience and channel of delivery?	Is the material likely to improve the target audiences' understanding of the Electricity Authority, industry, or sector?	Overall
<p>January prices were high due to high demand and constrained generation</p> <hr/> <p>What's behind current forward prices?</p> <hr/> <p>Hydro Storage: the lowdown</p>	2 – No clear audience identified. It's noted that this is meant to be a shorter engaging section from quarterly reports.	1 – Information is bite-sized and easy to digest, however there are some inconsistencies in the level of detail appropriate for the industry and media audience. For those outside of the industry it would be harder to understand some technicalities, e.g., general industry references and acronyms.	3 – It is likely to improve the understanding of the industry and sector, but there is no mention of the Authority's role in the industry. It's noted that the story lining helps in getting the messages across in a timely way.	2
Decision on undesirable trading situation claim	5 – Industry participants are identified in the body of the report, and roles of several parties is understood and recognised. (Including system operator, lines companies, generators, retailers).	5 – There is an appropriate amount of technicality used in the document keeping industry participants in mind, along with the channel of delivery for further engagement. The glossary of abbreviations and terms is useful for an audience that isn't too familiar with industry jargon.	5 – This document provides the industry participants a detailed view of their analysis into the UTS, findings from the actions of generators and the system operator and lessons for other non-alleged participants. It also provides a detailed look into the Authority's functions and statutory obligations in the industry.	5
Overall	4.2	4	4.5	4.2



APPENDIX 7: SUMMARY ASSESSMENT OF LOW EMISSIONS ENERGY: [MEASURE 4]

Table 10: Assessment dimensions and rubric [Assessment of the ability of market settings to facilitate an efficient transition to low-emissions energy]

Dimension	Rating				
	1	2	3	4	5
Is there a clear problem definition related to low-emission transition?	The problem definition is unrelated to low-emission transition.	-	The problem definition is related to low-emissions transition	-	The problem definition is clearly and significantly related to low emissions transition
Are an appropriate range of options and statutory powers considered?	There are no options or trade-offs identified	-	There are some options or trade-offs identified	-	There are a comprehensive set of options or trade-offs identified
Has appropriate stakeholder engagement been conducted?	No stakeholder engagement has been conducted	-	Some stakeholder engagement has been conducted	-	A comprehensive level of stakeholder engagement has been conducted
Is an appropriate rationale set out for the option(s) chosen, and the trade-offs balance of low-emission transition sustainability with other considerations clearly explained?	No clarity is provided in the rationale set out for the option(s) chosen and no considerations for the balance of sustainability are explained	-	Some clarity is provided in the rationale set out for the option(s) chosen, with and some considerations for the balance of sustainability are explained	-	Clarity is provided in the rationale set out for the option(s) chosen, with strong evidence of consideration of the trade-offs involved in low-emission transition. and there is a clear explanation for the balance of sustainability.

Table 11: Summary rating [Assessment of the ability of market settings to facilitate an efficient transition to low-emissions energy]

Document	Is there a clear problem definition related to low-emission transition?	Are an appropriate range of options and statutory powers considered?	Has appropriate stakeholder engagement been conducted?	Is an appropriate rationale set out for the option(s) chosen, and the trade-offs balance of low-emission transition sustainability with other considerations clearly explained?	Overall
Transition to Low Emissions Energy System	5 – Clear rationale for achieving net zero emissions by 2050, and 100% renewable electricity generation by 2030	4 - Alignment with working for consumers, security and reliance, and efficiency is evidenced, which is in line with their statutory objective.	3 – No evidence of stakeholder engagement is evidenced. Although, it's noted that this is a brief introduction of what they're trying to achieve with the transition and scoring reflects that.	5 – Appropriate rationale set out for their options/programmes in the context of the document. Efficiency and low emissions transition is not viewed as mutually exclusive, although it is noted that their objective is for efficient transition without comprising future security and reliability.	4.3
Energy Transition Roadmap	5 – Clear success measures, and rationale for the transition roadmap	5 – All statutory powers are used in the roadmap for monitoring, compliance and enforcement, efficiency, risk management, reliability, system security and reliability.	4 – Evidence of engaging industry participants in joint execution of roadmap activities, working with distributors, internal workshops, external consultation	2 – Noting that this is a roadmap visual, there is nothing that explains the trade-off of low emissions with other considerations, or how these initiatives fit with the broader strategic objectives of the Authority.	4
Cover paper for Roadmap	5 – Clear problem definition, the document binding all the programmes they're currently doing.	5 – Purpose of the Authority is highlighted to facilitate energy transformation and support generators, retailers, distributors, and the system operation to keep the light on now and in the future without compromising their other statutory obligations of future security and reliability. Alignment with working for consumers is also evidenced in the report, which is in line with their statutory objective.	3 – Insights from interview suggest good outside feedback, and the document includes evidence of stakeholder engagement through consultations in workstreams. However, a stated purpose of the document was to drive greater industry coordination towards low emission transition, and there was opportunity to engage more broadly on sector transition pathways.	4 – It's understood through the document and interview insights that there is consideration of security and reliability currently and in the future, and efficiency is seen as largely consistent with the pathway towards low emissions.	4.3
Wholesale market competition review	3 – The rationale for conducting a review isn't explicitly mentioned, but the observations provide some context on the issues surrounding the wholesale market.	5 – The authority's focus and statutory objective is highlighted by the mention of the long-term interest of electricity consumers and on maintaining competitiveness in the industry.	5 – Clear mention of stakeholder engagement with investors to draw observations from the review, along with addressing potential issues in response to the review through consultation.	2 – Does not address any alignment with low-emissions transition. Although it is noted that this is a review for another statutory objective for maintaining competitiveness in the industry.	3.8
Updating the regulatory settings for distribution networks	5 – Clear rationale for updating the regulatory settings to support an affordable transition to a low emissions economy.	5 – A wide range of options are considered that are derived from previous work, international comparisons, through consultation and a cost benefit analysis.	5 – The report focuses on previous and current consultation with stakeholders from the industry and wider industry.	5 – Clear alignment with low emissions economy and maintaining sustainable and affordable long-term benefits to consumers	5
Transmission Pricing Methodology (from April 2022 Decision document)	3 – There is a problem definition related to efficiency but not explicitly how it helps in the transition towards low emission. We note that the original problem definition was not about low emissions but following feedback this was included in scope.	5 – Large range of options are considered thematically through consultations and stakeholder engagement showing the various perspectives were heard and acknowledged.	5 – Appropriate stakeholder engagement has been conducted.	4 – Appropriate rationale set out for options chosen through their feedback and assessment sections. The trade-offs between low emissions transition and sustainability aren't considered.	4.3
Overall	4.3	4.8	4.2	3.7	4.2



APPENDIX 8: LIST OF INTERVIEWEES

Table 12: List of internal Electricity Authority interviewees

Contact name	Position
Brent Lewers	Manager, Retail and Networks
Andy Doube	General Manager, Market Policy
Nathan Spence	Senior Policy Advisor
Joey Au	Chief Strategy Officer
Doug Watt	Manager, Market Monitoring
Julia Hall	Principal Advisor
Sarah Gillies	General Manager, Legal, Monitoring and Compliance
Tim Sparks	Principal advisor (at a relevant time)
Rob Bernau	Director, Network Pricing (at the time)
Chris Otton	Principal Analyst
Peter Kerr	Manager, Compliance
Hannah Hopper	Senior Investigator

Limitations

We were unavailable to set up interviews with external interviewees to assess the measures due to timeframe constraints.

