



# Response to independent assessment 2023/24

16 December 2024

# Contents

1.	Introduction	3
2.	Results summary	3
3.	Opportunities identified for the Authority	4
	Increased focus on small business consumers	4
	Less formal and more direct engagement methods	5
	Balancing reactive and proactive work	6
	Lifting transparency	6
	Improving the accessibility of web content	7
	Potential future work to more substantively assess the Authority's contribution to the low-emissions transition	8
4.	MartinJenkins report	8

# 1. Introduction

- 1.1 Each year the Electricity Authority Te Mana Hiko (Authority) measures its performance, the progress made in advancing its statutory objectives, and how well it is delivering against its strategy.
- 1.2 In April 2024, the Authority commissioned MartinJenkins<sup>1</sup> to conduct an independent assessment of the Authority's performance in 2023/24. It focused on the Authority's strategic ambitions set out in our *Statement of intent 2021-25*<sup>2</sup>, assessing against four impact measures for three of our strategic ambitions (consumer centricity, trust and confidence and low-emissions energy).
- 1.3 This document summarises the high-level findings from the 2023/24 independent assessment, including the themes raised in the assessment and our response.
- 1.4 MartinJenkins also identified a range of opportunities for improvement that they recommend the Authority undertake in the future. Some are already underway as a part of our 2024/25 work programme, which we have highlighted below.

## 2. Results summary

- 2.1 Overall, the Authority scored an average of 4.5 out of 5 across the four impact measures of our strategic ambitions. We saw an improvement across all impact measures compared with last year's results and lifted our performance against all assessed measures over the last four years.

Measure #	Ambition	Impact	Measure	2020/21	2021/22	2022/23	2023/24
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	3.9	4.25	4.1	4.4
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	3.7	4.1	4.3	4.6
3	Trust and confidence	The Electricity Authority and our actions promote trust and confidence	Assessment of the quality of material produced (eg, EMI reports, thought pieces)	4.2	4.2	3.9	4.3
4	Low-emissions energy <sup>3</sup>	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	-	4.2	4.3	4.5

- 2.2 Results from the independent assessment were included in the Authority's *Annual Report 2023/24* as part of our performance measures. The Authority uses

<sup>1</sup> MartinJenkins is an independent advice and consultancy firm with a long history working with government organisations. We use an external provider to ensure the assessment is independent, removing the risk of internal bias. This independent assessment has provided qualitative information on areas the Authority is doing well in, and areas for improvement, since 2021.

<sup>2</sup> [Statement of intent 2021-25 \(amended\)](#)

<sup>3</sup> The low-emissions measure was introduced in 2022.

performance measures to assess progress against our statutory objectives. A range of measures and data sources may be used to assess an outcome. The results from the independent assessment are used alongside a consumer perception survey, participant perception survey and internally held data<sup>4</sup>.

- 2.3 The use of many data sources allows the Authority to consider performance from many perspectives, and these sources work together to paint an overall picture of performance. Performance measures should be considered in the wider context of the outcome to which they relate.

## **3. Opportunities identified for the Authority**

- 3.1 As part of the independent assessment, MartinJenkins made a series of recommendations to the Authority:
- a. Increasing our focus on small business consumers
  - b. Using less formal and more direct engagement methods
  - c. Balancing reactive and proactive work
  - d. Lifting transparency
  - e. Improving the accessibility of web content.
- 3.2 MartinJenkins also noted that it may be timely for the Authority to undertake a more substantial assessment of our contribution to the low-emissions transition, with Aotearoa New Zealand's second emissions reduction plan (ERP2) due to be published by the end of 2024.

### **Increased focus on small business consumers**

- 3.3 MartinJenkins observed that there is scope for the Authority to grow understanding and engagement with small business consumers – particularly with winding up of the Consumer Advocacy Council. They noted that the needs of, and impacts on, small business consumers were not covered in depth in the relevant documents they reviewed. This led to their recommendation for us to consider what structures and processes we will use to listen to the voices of small business consumers more.

### **Our response**

- 3.4 One of our statutory objectives is the protection of small consumers in their dealings with industry participants – which includes both residential and small businesses. Therefore, we want to work hard to ensure all consumers are all able to be a part of our decision-making processes. Providing clarity on our consultations and decision-making process remains a priority for us and we continue to focus on improving our engagement. We have seen a greater uptake in non-participant involvement, by working on increasing accessibility over the past year through our language use, published articles, education workstreams and public consultations. However, most new non-participant involvement has been residential and not small business based. This encouraged us to continue increasing consumer accessibility to our

<sup>4</sup> The Authority engage a third party to conduct consumer and participant perception surveys, which contribute to measurement of Authority performance. Results are recorded in the annual report.

decision-making processes, and there is more we can do to increase involvement of small business consumers.

- 3.5 For the 2023/24 year, we focused on improving our approach to collecting and monitoring retail data, which will continue into 2024/25. It will improve our visibility of the retail market and enable us to identify potential issues, publish more insights and make well-informed policy decisions that will benefit consumers – including small businesses.
- 3.6 We also began an audience segmentation project in June 2024 to gain a deeper understanding of our different consumer audiences, and specifically to seek more information about small businesses and medically dependent consumers. This will enable enhanced communication through matching audiences, messages, media, products and services based on the specific needs and preferences of different consumer groups such as small businesses. Over time this will build our understanding of the range of consumers and their needs, to enable more targeted approaches to drive change.
- 3.7 Additionally, our new advisory group, the Electricity Authority Advisory Group, is bringing the voices of our increasingly diverse stakeholder groups, including small business consumers, to Authority decision-making. The group exists alongside the Security and Reliability Council, as well as various technical working groups established to support specific projects.
- 3.8 We are beginning to see the benefits of our work in this space in 2023/24 such as consumers making up most of the consultation submissions behind our decision to make the Consumer Care Guidelines mandatory. We will be monitoring to see how it continues to improve with our further efforts in 2024/25.

## Less formal and more direct engagement methods

- 3.9 MartinJenkins recommended the Authority continue to build on and learn from its engagement exercises to become more visible and broaden its outreach. They noted that there is appetite among external stakeholders for us to make greater use of less formal and more direct engagement methods, including regular and ad hoc meetings, and are also keen for more proactive updates on our work programme.

## Our response

- 3.10 For 2023/24, consumer centricity was one of our strategic ambitions: putting consumers and their varied perspectives and aspirations front and centre of what we do and how we do it. We agree that traditional and formal consultation and engagement processes don't suit all consumers, and we need to explore new avenues of communication.
- 3.11 During 2023/24, we began to test new ways to extend our reach and bring more diverse views to our work. This included using shorter-form online survey questionnaires alongside our usual formal submission processes, which aimed to make the process more straightforward. One of the first consultations using an online questionnaire alongside email submissions was on [improving our Consumer Care Guidelines](#), and we received over 1,000 submissions mostly from consumers. With the success we saw from the first few consultations using this method, we are looking to use it more regularly and explore ways to improve it further.
- 3.12 As a regulator, we are committed to doing everything within our power to tackle energy hardship. In March 2024, we hosted a consumer and industry wānanga.

This gave us some incredible insights, as well as areas to explore in more detail that could have a real impact for people living in energy hardship in Aotearoa. We received positive feedback from wānanga participants, with most expressing an interest in staying involved in future events. We hosted another wānanga in October 2024 and expect this form of engagement will continue into the future.

- 3.13 Our recently launched Power Innovation Pathway has received over forty submissions in its first month through a light-touch and efficient interface. We are connecting with and understanding the needs of stakeholders who we traditionally have less engagement from. We will continue to provide timely regulatory advice and guidance through this channel.

## Balancing reactive and proactive work

- 3.14 MartinJenkins suggested the Authority could develop an organisation-wide forward research programme across its functions. They expected it would help us prioritise and identify gaps and allocate resourcing to ensure reactive work doesn't crowd out more proactive work.

### Our response

- 3.15 Our increase in baseline funding for 2024/25 has enabled us to rebalance our work programme with more proactive work. Previous increases to our baseline funding have been nominal, leading to our budget being pressured by significant increases in service provider costs and an increasing work programme that led to the need to prioritise reactive work.
- 3.16 We refreshed the Authority's strategic outlook out to ten years across the short, medium and long term. Our vision and strategic outcomes are set out in our [Statement of Intent 2024-28](#) and [Statement of Performance Expectations 2024/25](#). Through this work we have prioritised a range of proactive work streams<sup>5</sup> informed through our own planning, the future security and resilience workstreams, Market Development Advisory Group's recommendations, [the strategic baseline review recommendations](#)<sup>6</sup> and from our advisory groups.
- 3.17 There is always room for more data and research to help support our decision-making and regulation. As the Authority continues to evolve with the environment it operates in there is the opportunity to bring in more inhouse research to support this. We are working towards a better balance in our work programme to resolve problems as they arise while working on setting up New Zealand for the future.

## Lifting transparency

- 3.18 MartinJenkins noted that much of the Authority's work is highly technical, which can be a barrier to understanding for non-industry readers. They recommended this could be helped by increasing transparency through the use of more plain English, accessible explanations of industry terms, more graphics and linking background information. They also recommended including more timelines for decision-making

<sup>5</sup> Proactive workstreams include activities with outcomes medium- to long-term such as the 'generation pipeline disclosure' which works to improve the collection and publication of information on the generation development pipeline and energy and capacity adequacy (the Generation Investment Survey), in line with the Market Development Advisory Group's recommendation.

<sup>6</sup> Strategic baseline review: An external assessment done by Sapere, commissioned by the Ministry of Business, Innovation and Employment, on the Authority's positioning, performance and cost pressures. The report also provided recommendations for improvement.

processes and ensuring consultation calendars (joined with the Commerce Commission) were up to date.

### **Our response**

- 3.19 Consumer centricity and trust and confidence were two of our ambitions in 2023/24 and keeping consumers at the centre of our decision-making will always remain key.
- 3.20 A key focus of publishing our content online is to connect relevant material so the user can navigate to connected projects, consultations and areas of interest more readily. The Authority has also increased the use of plain language through internal training to improve accessibility to complicated topics.
- 3.21 The Authority's regulatory strategy, which is currently under development, will show the links between our desired strategic outcomes, our regulatory functions and indicative work programme. This will provide transparency to industry participants and consumers about how we intend to prioritise our work over the short, medium and long term, to deliver on our statutory objectives.
- 3.22 The Electricity Authority Advisory Group formed in June 2024 and will continue to bring the voices of our increasingly diverse stakeholder groups, including consumers, to Authority decision-making. This will help ensure consumers are a part of the decision-making process from the start.
- 3.23 We are also undertaking several educational campaigns such as our competition and consumer mobility campaign. By improving consumers' understanding of the electricity industry, they will be better informed to engage with the industry and make better choices.
- 3.24 Transparency is also important for participants to engage meaningfully with us, and for other regulators who we work closely with via the Council of Energy Regulators. We are also partnering with the Commerce Commission to deliver the new Energy Competition Task Force<sup>7</sup> where transparency between us and participants, stakeholders and consumers will result in stronger decision-making, all opinions being heard and ultimately better results.

### **Improving the accessibility of web content**

- 3.25 The assessment also recommended we improve efforts to make it easier for consumers and other stakeholders with disabilities to engage in the Authority's processes and gave specific suggestions for improving accessibility of our online content.

### **Our response**

- 3.26 We want to make sure that all consumers have the support they need to be able to participate in our processes and decision-making, and feel confident in doing so. During 2023/24, we began improving the accessibility of our web content and processes by upskilling staff in plain English use for our publications and improving accessibility to our content through education campaigns. In 2024/25 we plan to

<sup>7</sup> The Electricity Authority and Commerce Commission have jointly established the Energy Competition Task Force to investigate ways to improve the performance of the electricity market. The Task Force was established in response to the fuel shortage and spike in wholesale prices in August 2024, in addition to the immediate steps we, and others, took to manage security of supply and bring prices down.

expand our consumer education campaigns for competition and switching providers, improving web accessibility of our published papers and video content.

## **Potential future work to more substantively assess the Authority's contribution to the low-emissions transition**

- 3.27 While it was not within the scope of the report, in light of the upcoming delivery of [New Zealand's second emissions reduction plan](#) (ERP2), MartinJenkins suggested the Authority consider how we contribute to the low-emissions transition, to align our work and staff emissions with new government policy.

### **Our response**

- 3.28 Supporting New Zealand's transition through electrification is one of the core priorities of the Authority and is also in line with both Government's and the Minister's expectations of us. Large quantities of new renewable electricity generation, increased use of distributed energy resources, new ways to participate and more participants are already on the horizon. The Authority has a significant role to play in supporting the electricity industry, working with other regulators and Government to achieve it.
- 3.29 We have a wide range of proactive workstreams, both underway and upcoming from our internal research and our advisory group recommendations, that relate to supporting the transition. We will also assess and update our position to ensure we align with ERP2 when it is released to support the Government's public service targets. This will involve not only our work, but also assessing the Authority's own emissions and ways of working to reduce them.

## **4. MartinJenkins report**

- 4.1 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.
- 4.2 We note that, in the case of the external interviews undertaken for the assessment, that the results presented are the perceptions of respondents as representatives of their organisations and do not necessarily reflect the views of the Authority.



MARTIN  
JENKINS



# Independent assessment of the Electricity Authority's impact measures 2023-24

**Final Report**

---

08 August 2024  
Commercial in Confidence



**Disclaimer**

This report has been prepared solely for the purposes stated in it. It should not be relied on for any other purpose.

No part of this report should be reproduced, distributed, or communicated to any third party, unless we explicitly consent to this in advance. We do not accept any liability if this report is used for some other purpose for which it was not intended, nor any liability to any third party in respect of this report.

Information provided by the client or others for this assignment has not been independently verified or audited.

Any financial projections included in this document (including budgets or forecasts) are prospective financial information. Those projections are based on information provided by the client and on assumptions about future events and management action that are outside our control and that may or may not occur.

We have made reasonable efforts to ensure that the information contained in this report was up to date as at the time the report was published. That information may become out of date quickly, including as a result of events that are outside our control.

MartinJenkins, and its directors, officers, employees, agents, consultants, and advisers, will not have any liability arising from or otherwise in connection with this report (or any omissions from it), whether in contract, tort (including for negligence, breach of statutory duty, or otherwise), or any other form of legal liability (except for any liability that by law may not be excluded). The client irrevocably waives all claims against them in connection with any such liability.

This Disclaimer supplements and does not replace the Terms and Conditions of our engagement contained in the Engagement Letter for this assignment.



# Contents

<b>Executive summary</b>	<b>1</b>
An independent assessment of four impact measures	1
A qualitative assessment approach	1
Overall performance has improved across the four measures	2
Opportunities for continued improvement	3
<b>About this report</b>	<b>5</b>
The Electricity Authority is a kaitiaki of electricity	5
The Authority has five strategic ambitions	5
This assessment is part of the Authority's statutory performance reporting against its 2021-2025 Statement of Intent	6
It assesses four impact measures across three of the Authority's 2023-24 strategic ambitions	6
What this report is not	7
Potential future work to more substantively assess the Authority's contribution to the low-emissions transition	7
<b>Approach</b>	<b>9</b>
We applied an established assessment rubric	9
We selected a sample of documents...	12
... and used qualitative methods to assess the selected documents	13
<b>Assessment of consumer centricity</b>	<b>14</b>
Introduction	14
Overview of selected documents	14
Findings for Measure 1	16
Summary of scores for Measure 1	18
Findings for Measure 2	19
Summary of scores for Measure 2	22
<b>Assessment of trust and confidence</b>	<b>23</b>
Introduction	23
Overview of selected documents	23
Findings for Measure 3	24
Summary of scores for Measure 3	25
<b>Assessment of low-emissions energy</b>	<b>27</b>
Introduction	27

Overview of selected documents	27
Findings for Measure 4	28
Summary of scores for Measure 4	30
<b>Opportunities for learning and improvement</b>	<b>31</b>
The assessment results show continued improvement	31
Increased focus on small business consumers	32
Less formal and more direct engagement methods	32
Balancing reactive and proactive work	32
Lifting transparency	33
Improving the accessibility of web content	33
<b>Appendix 1 : Assessment dimensions and criteria</b>	<b>34</b>
Measure 1	34
Measure 2	35
Measure 3	36
Measure 4	37
<b>Appendix 2 : Sampled documents</b>	<b>38</b>

## Appendices

<b>Appendix 1 : Assessment dimensions and criteria</b>	<b>34</b>
<b>Appendix 2 : Sampled documents</b>	<b>38</b>

## Tables

Table 1: 2023-24 strategic ambitions and impact measures	2
Table 2: 2023-24 strategic ambitions and impact measures	7
Table 3: Rating scale	12
Table 4: Mix of sampled documents, by type and business unit	13
Table 5: Scores for Measure 1	19
Table 6: Scores for Measure 2	22

Table 7:	Scores for Measure 3	26
Table 8:	Scores for Measure 4	30
Table 9:	Assessment of the quality of our decision-making processes on meeting consumers' needs	34
Table 10:	Assessment of the quality of our engagement with consumers in our decision-making processes	35
Table 11:	Assessment of the quality of material produced (e.g. EMI reports, thought pieces)	36
Table 12:	Assessment of the ability of market settings to facilitate an efficient transition to low-emissions energy	37
Table 13:	Sampled documents	38

## Figures

Figure 1:	Overall scores compared to previous years' assessments	3
Figure 2:	Overall scores compared to previous years' assessments	31

# Preface

This report has been prepared for the Electricity Authority by Jo Smith, and reviewed by Nick Carlaw from MartinJenkins (Martin, Jenkins & Associates Ltd).

For over 30 years MartinJenkins has been a trusted adviser to clients in the government, private, and non-profit sectors in Aotearoa New Zealand and internationally. Our services include organisational performance, employment relations, financial and economic analysis, economic development, research and evaluation, data analytics, engagement, and public policy and regulatory systems.

We are recognised as experts in the business of government. We have worked for a wide range of public-sector organisations from both central and local government, and we also advise business and non-profit clients on engaging with government.

Kei te āwhina mātau ki te whakapai ake i a Aotearoa. We are a values-based organisation, driven by a clear purpose of helping make Aotearoa New Zealand a better place. Our firm is made up of people who are highly motivated to serve the New Zealand public, and to work on projects that make a difference.

Established in 1993, we are a privately owned New Zealand limited liability company, with offices in Wellington and Auckland. Our firm is governed by a Board made up of Partners Nick Davis, Allana Coulon, Richard Tait, Sarah Baddeley, and Nick Carlaw, as well as Independent Director Sophia Gunn and Independent Chair David Prentice.



# Executive summary

## An independent assessment of four impact measures

The Electricity Authority undertakes statutory reporting on its performance, the progress made in advancing its statutory objectives, and how well it is delivering against its strategy as set out in its 2021-2025 Statement of Intent (SoI). Over the period of this SoI, the Authority has measured progress made towards its statutory objectives using outcome measures, and measured progress made towards its strategic ambitions using impact measures.

While we note that the Authority has published an updated SoI for 2024-28 with an updated vision and outcomes framework, this assessment is limited to the impact measures and strategic ambitions described in its 2021-2025 SoI.

In 2021, the Authority commissioned MartinJenkins to design and undertake an independent qualitative assessment of three of these measures, across two strategic ambitions (consumer centricity, and trust and confidence). In 2022 and 2023, we repeated the exercise using the same assessment framework, but with the addition of a fourth impact measure, covering the strategic ambition of low-emissions energy. The results of these independent assessments are presented in the Authority's Annual Reports.

The Authority has commissioned us to undertake the same assessment exercise for the 2023-24 year. As with the previous two years, it covers four impact measures across three of the strategic ambitions. For the purposes of this report, we are assessing the Authority's performance against three of its 2023-24 strategic ambitions.

## A qualitative assessment approach

Our assessment primarily involved reviewing a sample of documents for each measure. In addition, we conducted interviews with 16 Authority staff, to gain a better understanding of the context for the documents, as well as answer specific questions. We also interviewed eight external stakeholders, to seek their views on both specific documents and projects, as well as more general feedback on the Authority's delivery against the in-scope impact measures.

This assessment is not a technical critique of the Authority's regulatory policy making. It does not assess the policy merits of the Authority's decisions.



# Overall performance has improved across the four measures

The results for 2023-24 show an improvement on last year's results, for each of the four impact measures (Table 1).

**Table 1: 2023-24 strategic ambitions and impact measures**

Ambition	Assessment measure		Score out of 5
Consumer centricity	Measure 1	Assessment of the quality of our decision-making processes on meeting consumers' needs	4.4
	Measure 2	Assessment of the quality of our engagement with consumers in our decision-making processes	4.6
Trust and confidence	Measure 3	Assessment of the quality of material produced (e.g., EMI reports, thought pieces)	4.3
Low-emissions energy	Measure 4	Assessment of the ability of market settings to facilitate an efficient transition to low-emissions energy	4.5

The Authority's performance against each of the measures has also generally lifted across the last four years (Figure 1).





**Figure 1: Overall scores compared to previous years' assessments**



## Opportunities for continued improvement

Through our document review and interviews, we identified some ways in which the Authority could improve its impact across the four measures.

### Increased focus on small business consumers

There is scope for the Authority to grow its understanding of and engagement with small business consumers. This is relevant to projects and work streams with objectives and levers for directly influencing outcomes for these consumers, in their dealing with industry participants. The needs of, and impacts on, small business consumers were not covered in depth in the relevant documents we reviewed.

The Authority will need to consider what structures and processes it will use to garner the voices of small business consumers. For example, how it will use its new Advisory Group to elicit and incorporate perspectives from a diversity of small business and residential consumers into its work.

### Less formal and more direct engagement methods

There is opportunity for the Authority to lift its visibility and broaden its outreach. It has traditionally favoured formal consultation processes, involving consultation documents and written submissions. Over the assessment period, the Authority has made some use of other engagement methods, such as surveys, webinars and a wānanga. It should continue to build on and learn from its engagement exercises. It will need to ensure engagement channels are tailored and relevant to small business and



residential consumers. There is appetite among external stakeholders for the Authority to make greater use of less formal and more direct engagement methods, including regular and ad hoc meetings. Stakeholders are also keen for more proactive updates on its work programme.

## Balancing reactive and proactive work

While the Authority has an annual programme for its regulatory policy work, we understand that it lacks an organisation-wide forward research programme. It could be useful for the Authority to develop an overview of planned research work across its functions. This would help it prioritise and identify gaps, and allocate resourcing to ensure reactive work doesn't crowd out more longer-term thinking. In turn, this could help support the Authority to take more of a proactive role in the transition to low-emissions energy.

## Lifting transparency and accessibility

Much of the Authority's work is highly technical. This can make it difficult for consumer groups, new or emerging participants, and other interested parties, to engage. The document sample showed that the Authority is making efforts to better communicate its work to a broader range of stakeholders. The Authority should continue to focus on making technical material more accessible, including by explaining jargon, providing plain English summaries, and linking to background information. To help support trust and confidence, published material should include information around next steps and timeframes for decision-making.

Particular efforts are needed to make it easier for consumers and other stakeholders with disabilities to engage in the Authority's processes. In our report, we make some specific suggestions for improving the accessibility of web content.



# About this report

## The Electricity Authority is a kaitiaki of electricity

*We are a kaitiaki of electricity. Our purpose is to enhance New Zealanders' lives, prosperity and environment through electricity. (Electricity Authority Statement of Intent 2021-2025, p. 9)*

The Electricity Authority is the regulator and steward of Aotearoa New Zealand's electricity industry. It was established under the Electricity Industry Act 2010 as an independent Crown Entity. It has a statutory objective to promote competition, efficiency, and reliability in the electricity industry for the long-term benefit of consumers. Since 31 December 2022, it has had the additional statutory objective of protecting the interests of domestic consumers and small business consumers in relation to the supply of electricity to those consumers, in their dealings with industry participants.

The Authority has a range of statutory functions that describe the ways in which it can regulate the electricity system and market to achieve its statutory objectives. These include actively monitoring market behaviour, developing and enforcing the rules (the Electricity Industry Participant Code 2010, "the Code"), and holding industry participants to account. It is responsible for the day-to-day operation of the electricity system and markets through contracted service providers. It can promote market development to ensure they deliver long-term benefits to consumers, while maintaining security of electricity supply. It also has a role in making data, information and tools available to help improve understanding of the electricity market by consumers and industry participants.

Consumers' best interests are at the heart of everything the Authority does. It works to achieve a secure and resilient, accessible and efficient electricity system to keep the lights on and provide choices for consumers in accessing the energy they need now and in the future.

It regulates the electricity industry, sets the market rules, and conducts operational activities to ensure the electricity system and markets run effectively. It works to create a competitive, reliable and efficient electricity industry for the long-term benefit of consumers and New Zealand.

## The Authority has five strategic ambitions

Over 2023-24, the Authority used five key strategic ambitions to guide its work:

- **Consumer centricity** to guide regulation and the industry.
- **Low-emissions energy** to electrify the economy.
- Building **trust and confidence** in the industry for all stakeholders.
- Having **thriving competition** delivering better outcomes for New Zealanders.
- Seeing **innovation flourishing**.



## This assessment is part of the Authority's statutory performance reporting against its 2021-2025 Statement of Intent

The Authority undertakes statutory reporting on its performance, the progress made in advancing its statutory objectives, and how well it is delivering against its strategy as set out in its 2021-2025 Statement of Intent (SoI). Over the period of this SoI, the Authority has measured progress made towards its statutory objectives using outcome measures, and measured progress made towards its strategic ambitions using impact measures.

While we note that the Authority has published an updated SoI for 2024-28 with an updated vision and outcomes framework, this assessment is limited to the impact measures and strategic ambitions described in its 2021-2025 SoI.

The Authority uses a variety of sources to assess its impact measures, including surveys and data. In 2021, it commissioned MartinJenkins to design and undertake an independent qualitative assessment of three of these measures, across two strategic ambitions (consumer centricity, and trust and confidence). In 2022 and 2023, we repeated the exercise using the same assessment framework, but with the addition of a fourth impact measure, covering the strategic ambition of low-emissions energy.

The results of these independent assessments are presented in the Authority's Annual Reports.

## It assesses four impact measures across three of the Authority's 2023-24 strategic ambitions

The Authority has commissioned us to undertake the same assessment exercise for the 2023-24 year. It covers four impact measures across three of the Authority's 2023-24 strategic ambitions (Table 2).

This report presents the findings of this year's assessment. It also compares the results to those from previous years. Where relevant, we make observations and suggestions for ways in which the Authority could continue to improve its performance against these measures.



**Table 2: 2023-24 strategic ambitions and impact measures**

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

## What this report is not

This assessment is not a technical critique of the Authority's regulatory policy making. It does not assess the policy merits of the Authority's decisions.

As described below under "assessment dimensions", measures 1-3 focus on the quality of the Authority's decision-making processes, engagement processes, and the clarity and accessibility of its outputs.

Measure 4 considers the quality of policy processes related to facilitating the transition to low-emissions energy. The assessment methodology does not evaluate the relevance, coherence or effectiveness of the Authority's work programme to support this transition.

## Potential future work to more substantively assess the Authority's contribution to the low-emissions transition

Consistent with the agreed scope and approach for this work, this report uses a previously established methodology to assess the four measures. With Aotearoa New Zealand's second Emissions Reduction Plan (ERP2) due to be published soon, it may be timely for the Authority to undertake a more substantial assessment of its performance against impact measure 4. We note that the Authority also reports through wider governmental reporting mechanisms against actions in the first Emissions Reduction Plan.



A review of reporting against impact measure 4 could involve a comprehensive review of the Authority's progress against its Energy Transition Roadmap.<sup>1</sup> The Roadmap sets out its work programme to support an efficient transition, including transformative work streams and significant reviews of the electricity market. It was created in 2021 and is now outdated for use in 2024.

A review could:

- Review documented progress and implementation against the Roadmap, as reported in the Authority's Annual Reports and other relevant documents.
- Triangulate with feedback gathered through any industry and consumer surveys the Authority has undertaken, and quantitative data on results (including relevant energy system and market performance metrics).
- Use interviews to seek feedback from a range of stakeholders, on their expectations for the Authority's contribution to the low-emissions transition and its performance to date (including the Ministry for Business, Innovation and Employment, as the Authority's monitoring agency).
- Assess alignment of the Roadmap against the ERP2, including identifying any gaps.
- Review and assess the alignment and adequacy of resourcing for delivery against the Roadmap.

<sup>1</sup> [Roadmap - Transition to Low Emissions Energy System \[v1.0\] \(iM ref 1337549.1\) \(ea.govt.nz\)](#)



# Approach

## We applied an established assessment rubric

To assess each of the four measures, we applied a rubric based on the approach taken in previous assessments. This rubric involves a set of dimensions for each measure, each of which are assessed on a five-point rating scale. The grading criteria for each dimension are set out in Appendix 1.

### Assessment dimensions

#### Consumer centricity

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

Measure 1: Assessment of the quality of our<sup>2</sup> decision-making processes on meeting consumers' needs

- How well are the impacted consumer groups identified?
  - Understanding of consumer needs and preferences
  - Evidence of consumer research and analysis
- Are the needs of, and the potential impact on, consumer groups appropriately recognised in the decision-making process?
  - Incorporation of consumer feedback into decision-making
  - Analysis of impacts on affected groups
  - Continuous improvement in decision-making processes
- Was an appropriate range of options considered in the decision-making process?
  - Responsiveness to changing consumer needs and market conditions
  - Adoption of best practice and innovations in the sector
- Is the rationale for the option(s) chosen well evidenced?
  - Evidence of impacts of alternative options and preferred option
- Were the decision-making processes clearly documented?
  - Transparency in decision-making

<sup>2</sup> 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.



### **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

- Is there clear rationale for which groups are engaged and to what extent?
  - Analysis of stakeholder groups and interests
- Did the decision-making processes include the use of appropriate channels, and did it offer sufficient timeframes to engage with identified consumers?
  - Effectiveness of engagement methods and channels
  - Timeliness and frequency of communication with consumers
  - Evaluation and improvement of engagement strategies
- Did the decision-making process engage with and consider a range of different consumer options?
  - Opportunities for consumer input and participation
  - Diversity and representativeness of consumer groups engaged
- Do final decisions appropriately respond to consumer feedback?
  - Integration of consumer feedback and perspectives into decision-making
  - Responsiveness to consumer concerns and feedback
  - Accountability and transparency in engagement processes
- Is the level of detail and complexity of information provided to consumer groups appropriate?
  - Clarity and accessibility of information provided to consumers
  - Alignment with industry and government standards for consumer engagement

### **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?
  - Collaboration and consultation with industry stakeholders and partners
  - Understanding of stakeholder groups and interests
- Is the level of detail and complexity appropriate for the target audience and delivery channel?
  - Clarity and accessibility of information provided





- Alignment with industry and government standards for consumer engagement
- Clarity and transparency in regulatory and policy decisions
- Is the material likely to improve the target audience's understanding of the EA, industry or sector?
  - Communication and dissemination of relevant and accurate information

## 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 and are identified outcomes related to low-emissions transition?
  - Integration of low-emissions energy goals into market design and operation
  - Responsiveness and adaptability to changing market and technology conditions
  - Evaluation and monitoring of low-emissions energy market performance
  - Promotion of competition and efficiency in low-emissions energy markets
- Was an appropriate range of options and statutory powers considered?
  - Continuous improvement and innovation in low-emissions energy market design and operation
  - Promotion of investment and innovation in low-emissions energy technologies
  - Clarity and consistency of low-emissions energy policy and regulatory frameworks, with other market goals
- Has appropriate stakeholder engagement been conducted?
  - Mitigation of negative impacts on consumers and market participants

## Assessment scale

Each dimension is assessed according to the following scale (Table 3). We have maintained the same scale as used in our previous assessments, to provide comparability across years.



**Table 3: Rating scale**

Rating	Assessment
1	Very poor
2	Poor
3	Satisfactory
4	Very good
5	Excellent

## We selected a sample of documents...

The Authority compiled a list of 154 documents and projects that were relevant outputs under the consumer centricity, trust and confidence and low-emissions ambitions for the 2023-24 financial year (ended 30 June 2024).

We used purposive sampling to select a sample of 24 documents (six for each measure, or 16% of the total long list). Our sampling approach aimed to get a spread of documents across the range of the Authority's activities and outputs. We did this by randomly selecting a mix of document type, target audience and business units of the Authority. Most of the selected outputs were documents or web pages, but some included videos or data tools/dashboards.

In most cases, it was necessary to also review related material to understand the background and context for the particular document (such as consultation papers, submissions and webinars). In total, we reviewed 59 documents, web pages, videos and data tools.

The sampled documents are listed in Appendix 2 and summarised by type and business unit in Table 4, below.



**Table 4: Mix of sampled documents, by type and business unit**

Document type	Number	Business unit	Number
Code amendment decision	2	Commercial	2
Consultation	2	Compliance	3
Decision	3	Data and information management	1
EMI pre-existing	1	Future security and resilience	1
Industry collaboration	3	Market policy	1
Industry guidance	3	Monitoring	2
Investigation result	1	Network pricing	4
Issues paper	1	Operations policy	4
Market commentary	2	Retail and network policy	4
Media release	1	Wholesale policy	1
Post-implementation review	1	Wholesale policy/Operations policy	1
Published material	2		
Transformational projects	2		
<b>Total</b>	<b>24</b>		<b>24</b>

## ... and used qualitative methods to assess the selected documents

We completed a desk-based review of the document sample. To help assess the documents, we interviewed 16 relevant Authority staff members. The purpose of these discussions was to gain a better understanding of the context for the work, as well as answer specific questions on the documents.

We also interviewed eight external stakeholders, to seek their views on both specific documents and projects, as well as more general feedback on the Authority's delivery against the in-scope impact measures. These interviewees spanned a range of the Authority's stakeholders, including industry participants, and representatives of commercial and residential consumers. External interviews were conducted on a confidential basis, and none of their comments are attributed or identifiable in this report.



# Assessment of consumer centricity

## Introduction

The Authority has traditionally been focused on creating long-term benefit for all consumers through developing market-oriented solutions that place downward pressure on prices, incentivise innovation and enhance consumer choice. Protecting the interests of consumers has been an integral part of the Authority's operations. The introduction of its additional strategic objective of protecting domestic and small business consumers in their dealings with industry participants has bolstered the Authority's ability to focus on consumer centricity.

## Overview of selected documents

### **Document 1.1: The changing nature of electricity demand in Aotearoa**

This was a market commentary article aimed at the general public. It explained the factors driving changes in baseload and peak demand, and the Authority's projects to respond to these changes, including the challenges of winter peak demand and distribution pricing reform. The commentary included charts, and links to related material. As part of our assessment, we also reviewed some of these associated papers to gain context on the article (including the consultation and decision papers on winter peak demand in 2023, noting that these pre-date the current assessment period).

### **Document 1.2: Solar energy sharing for social housing trial**

This was a notification that the Authority has approved two exemptions and technical and non-controversial changes to the Electricity Industry Participation Code 2010, to facilitate an energy sharing trial led by Kāinga Ora and Ara Ake. The trial involves Kāinga Ora homes equipped with solar panels to share excess solar energy with other Kāinga Ora tenants whose roofs are unsuitable for solar. The exemptions enabled this trial to occur, by allowing Wellington Electricity Lines Limited (as the distributor) and Intellihub Limited (as the metering equipment provider) to form part of a multiple trading relationship.

### **Document 1.3: Distribution pricing forums – request for feedback**

General news item thanking participants in four distribution pricing forums, held as part of the targeted reform of the distribution pricing project. It included links to the forum slides (which summarised participant input) and more information on the project, and invited feedback from forum participants.



## **Document 1.4: Three winter 2023 options to be retained**

News of the Authority's decision to permanently retain three options that were implemented for winter 2023, to enhance the reliability of the electricity system through improved market information and incentives. The article invited suggestions for potential longer-term enhancements to these options. It also informed that another option was implemented through an urgent Code amendment, and that the Authority will be consulting on an amendment to make this option permanent.

## **Document 1.5: Consumer plan comparison and switching**

Notice about consultation on options to support and promote consumer comparison and switching between retailers and plans. It reported that the consultation period has closed, and the Authority is considering the feedback. The page included links to the consultation document and submissions. The Authority received 79 submissions, of which 36 were received via an online survey.

## **Document 1.6: Reminder: EIEP5A changes for distributors from 1 April 2024**

Electricity Information Exchange Protocol 5A (EIEP5A) planned service interruptions are the standardised data format for distributors to notify retailers of planned outages and changes to already notified planned outages. This notice published a webinar that explained how to implement new EIEP5A functionality that was becoming mandatory for distributors from 1 April 2024. The notice included a link to the decision paper and an email address for more information.

## **Document 2.1: Shift your electricity use and help the New Zealand system**

An animation explaining real-time pricing (RTP), and how it can support the transition to low-emissions energy. The page included links to more information on the RTP project, and an RTP explainer.

## **Document 2.2: Stress tests remain unchanged**

Notice advising that two existing stress tests, and the base case and calculation methodology, remain unchanged and will continue to apply from October to December 2023. The notice applied to disclosing participants in the wholesale electricity market. It contained links to further information and guidance, as well as to an EMI dashboard where participants' disclosures are presented in interactive charts and tables (with their data anonymised).

## **Document 2.3: Authority identifies issue with WACC that could affect 2025 transmission prices**

Notice to industry participants that the Authority has identified an issue with regulatory rules around how transmission costs are set. Specifically, two dates used by the Commerce Commission and the Authority are not aligned, and this may affect how transmission charges are shared between Transpower's customers.



## **Document 2.4: Improving electricity consumer protections and choice**

Press release announcing the Authority's decision to mandate the Consumer Care Guidelines. The statement included links to the consultation and decision paper. It contained related information on the 2022/23 Consumer Care Guidelines Annual Alignment Statement report, which presents retailers' self-assessed statements of alignment with the Guidelines. It also mentioned consultation on consumer plan comparisons and switching which is occurring in parallel, and links to that consultation material.

## **Document 2.5: Disconnection, debt and consumer care**

Information release of retail data on disconnection, debt, and consumer care practices. It includes a link to background information, as well as an interactive dashboard on the Electricity Market Information (EMI) website. It also outlined known limitations with the data and provided links to consultation on improvements to retail market monitoring.

## **Document 2.6: Electricity consumer and industry wānanga**

News item about a wānanga that was held with representatives from the industry and consumer advocates to discuss energy wellbeing. The focus of the wānanga was on what the electricity sector can do to tackle energy hardship. The article included a quote from the Chief Executive and a photo of participants on the day.

# Findings for Measure 1

## **How well are the impacted consumer groups identified?**

The overall score for this dimension was 3.8 out of 5.

Consumer interests are generally identified at a high level. For example, the slides from the distribution pricing forums (document 1.3) identified different consumer interests at a high level (small and large households, low users, commercial). The consultation paper on consumer plan comparison and switching (document 1.5) had an implicit focus on residential consumers. The analysis included some breakdowns by different demographics, such as lower and higher income households. It considered options for consumer groups facing barriers to switching such as the elderly, lower socio-economic households, people in energy hardship, and people who lack internet access or capabilities.

We expected to see identification and analysis of consumer needs and impacts at a more granular level. For example, across the diversity of small business needs, and residential household circumstances. This is relevant to projects and work streams with objectives and levers for directly influencing outcomes for these consumers, in their dealings with industry participants.



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

The overall score for this dimension was 4.3 out of 5.

The documents showed that the impacts on consumers overall were clear drivers in the Authority's decision-making processes. For example, the impacts on consumers are the central driver of the Authority's responses to the changing nature of baseload and peak demand (document 1.1).

The distribution pricing forums (document 1.3) invited input from participants on a range of dimensions of the reforms, including consumer impacts. Feedback included equity considerations, hardship issues, and a need to be driven by changes that consumers want and need. Participants were asked what good consumer impact would look like for the Authority. Responses included consideration of health and welfare impacts, and of the potential adverse effects on consumers, especially vulnerable groups.

Over the year, the Authority has prioritised residential consumer energy hardship, and its efforts towards this are evident. The Authority has made progress on engaging with and better understanding the needs of household consumers, particularly those in energy hardship. It has made efforts to develop relationships and formal partnerships/Memoranda of Understanding (MoUs) with consumer advocacy groups. In external interviews, we heard that these efforts have been recognised by stakeholders.

## **Was an appropriate range of options considered in the decision-making process?**

The overall score for this dimension was 5 out of 5.

The documents reviewed for this measure considered a range of options (where this was appropriate). For example, in the article on the changing nature of electricity (document 1.1), the nature of the problems is well-articulated, and the identified options are clearly linked to these problems.

As noted above, our assessment did not take a view of the technical or policy merits of the options considered.

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

The overall score for this dimension was 4.7 out of 5.

The rationale for decisions was generally clearly explained and evidenced. For example, in the associated decision paper about retaining three winter 2023 options (document 1.4), the rationale for the decisions is very clearly set out. The paper also reflected issues raised in submissions. One of the issues raised was that the value of reliability differs between types of demand, and that residential and small business consumers value reliability highly. In response to this feedback, the Authority amended its definition of operational coordination. Based on submitter feedback, the Authority also adjusted its evaluation criteria, and considered additional options. In our view, the analysis was improved as a result of consultation.



In some cases, the rationale could have been more explicit. For example, the notice about the Code amendments for a solar energy sharing trial (document 1.2) could have explained what "energy sharing" is in plain English, why the amendments were needed, and included links to supporting information or more detail, for example to the information on Kāinga Ora's website.<sup>3</sup>

### **Were the decision-making processes clearly documented?**

The overall score for this dimension was 4.0 out of 5.

Most of the sampled documents adequately explained the decision-making process.

For completeness, the notice about the solar energy sharing trial (document 1.2) could have provided or linked to more background information, including on the decision-making process. The notice about consultation on consumer plan comparison and switching (document 1.6) did not state the timeframe for decision-making, or what the next steps are.

Some items include (or link to) a timeline of the decision-making process (for example the reminder notice about EIEP5A changes, document 1.6). This aids clarity and transparency.

## Summary of scores for Measure 1

<b>Measure 1 overall score</b>	<b>4.4</b>
------------------------------------	------------

<sup>3</sup> [Kāinga Ora and Ara Ake partner to enable solar energy sharing trial.:: Kāinga Ora – Homes and Communities \(kaingaora.govt.nz\).](#)





**Table 5: Scores for Measure 1**

Documents	1.1	1.2	1.3	1.4	1.5	1.6	Average score per dimension
How well are the impacted consumer groups identified?	4	4	4	3	4	-	<b>3.8</b>
Are the needs of, and the potential impact on, consumer groups appropriately recognised in the decision-making process?	4	5	4	3	5	5	<b>4.3</b>
Was an appropriate range of options considered in the decision-making process?	5	5	5	5	5	5	<b>5.0</b>
Is the rationale for the option(s) chosen well evidenced?	5	3	5	5	5	5	<b>4.7</b>
Were the decision-making processes clearly documented?	5	2	5	5	2	5	<b>4.0</b>
<b>Average score per document</b>	<b>4.6</b>	<b>3.8</b>	<b>4.6</b>	<b>4.2</b>	<b>4.2</b>	<b>5.0</b>	<b>4.4</b>

**Note:** A dash (-) indicates that the dimension was deemed not applicable for this document.

The changes to EIEP5A requirements (document 1.6) are for the ultimate benefit of all consumers, but are several steps removed from having direct consumer impacts. They do not influence how retailers notify their customers about planned outages. However, they do assist retailers' responses to consumer enquiries about power outages, as the information on planned outages is more accessible to their call centre staff. We would not expect the industry briefing to have distinguished between different groups of consumers, and have deemed this assessment dimension as not relevant for this particular publication.

## Findings for Measure 2

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

The overall score for this dimension was 5 out of 5.

The sampled documents were generally very clear on the target audience and how they are engaged. For example, the notice that the Authority had identified issues with WACC (document 2.3) explained which participants are affected, and how and when the Authority will consult with them on options.

In interviews, external stakeholders noted there is a challenge for the Authority to get clearer on why it is engaging with consumers, whether this should include direct engagement with end-users (rather than via advocacy bodies), and how it will use the information gathered to inform its regulatory policy



and decision-making. This is a bigger conceptual question for the Authority, around how it gives effect to its relatively new legislative mandate across the suite of its work programmes. Stakeholders are keen to see the Authority get some more "*runs on the board*" in terms of translating consumer centricity into decisions and tangible action.

### **Did the decision-making processes include the use of appropriate channels, and did it offer sufficient timeframes to engage with identified consumers?**

The overall score for this dimension was 4.6 out of 5.

The Authority has made efforts over the last year to extend its outreach and try new modes of engagement.

For example, in the consultation on improving consumer protections and choice (document 2.4), the Authority ran an online survey, in addition to its usual formal submissions process. The online survey was heavily promoted by Common Grace Aotearoa. It received nearly 1,000 responses, as well as 128 formal submissions (including 108 from consumers and 12 from consumer advocacy groups).

The Authority also facilitated an electricity consumer and industry wānanga (document 2.6). Participant feedback was gathered via email after the event. The Authority received positive feedback from wānanga participants and most expressed an interest in staying involved. There was also interest in the Authority facilitating another wānanga, to explore the issues raised in more depth. A second wānanga is planned for September 2024.

In terms of timeframes, we note that the deadline for submissions for measures to strengthen retail data on disconnection, debt and consumer care practices (document 2.5) was extended on request from stakeholders, as it coincided with other consultations. External stakeholders commented that clashing consultations across the work of relevant agencies (principally, the Authority, the Commerce Commission and the Ministry for Business, Innovation and Employment) was a common occurrence. Some expressed desire for a more detailed, up to date and coordinated consultation calendar, to help them better plan their submissions efforts.

The Authority's engagement efforts over the last year have been recognised and appreciated by external stakeholders. In interviews, stakeholders told us that they particularly value regular meetings, including face-to-face engagements with the Authority. Several expressed desire for more face-to-face interactions, as they consider these can be more productive, and more effective for building understanding of each other's perspectives, than traditional, formal submissions processes.

Some stakeholders expressed desire for more proactive outreach from the Authority, and updates on its work programme. Some are also keen for the Authority to strengthen its external focus, and to broaden and deepen its engagement with smaller and emerging industry participants and investors.



## **Did the decision-making process engage with and consider a range of different consumer options?**

The overall score for this dimension was 4.2 out of 5.

Most of the sampled documents considered a range of consumer options. Several external stakeholders saw scope for engaging with and considering options for a broader diversity of consumers. The purpose of this would be to get greater specificity about what the long-term benefits to consumers look like, and what the Authority can do to support these benefits (within its legislative remit). Including for:

- the diversity of small business consumers, and
- vulnerable consumers (including medically dependent consumers), as well as disabled consumers.

## **Do final decisions appropriately respond to consumer feedback?**

The overall score for this dimension was 4.5 out of 5.

We saw that submitter feedback was incorporated into the Authority's decision-making, including from consumer advocates. There was evidence of options being added or adjusted in response to consumer feedback.

For example, the decision paper associated with the press release on improving electricity consumer protections and choice (2.4) includes an analysis of submissions, the majority of which were from consumers. It contains evidence of decisions reflecting consumer feedback. For example, based on feedback, the Authority adjusted its preferred option to that supported by submitters, and amended this option to address issues raised in submissions (revising the Guidelines before making them mandatory).

In interviews, several external stakeholders commented that, over the last year, the Authority has been responsive and good at listening.

## **Is the level of detail and complexity of information provided to consumer groups appropriate?**

The overall score for this dimension was 4.5 out of 5.

Much of the Authority's work is highly technical. This can make it difficult for consumer groups, new or emerging participants, and other interested parties, to engage.

The document sample showed that the Authority is making efforts to better communicate its work, to a broader range of stakeholders. For example, the animation on real-time pricing (document 2.1) was high quality, with plain English explanations and good-sized captions. The related explainer brochure was also clear and well-written, but still quite technical for readers without specialist expertise (such as potential new market entrants).



The press release on improving consumer protections and choice (document 2.4) was a good example of providing additional information on related decision-making processes and industry reporting. This helps the audience locate and understand the topic within a broader work programme.

## Summary of scores for Measure 2

<b>Measure 2 overall score</b>	<b>4.6</b>
--------------------------------	------------

**Table 6: Scores for Measure 2**

Documents	2.1	2.2	2.3	2.4	2.5	2.6	Average score per dimension
<b>Dimension</b>							
Is there clear rationale for which groups are engaged and to what extent?	5	5	5	5	5	5	<b>5.0</b>
Did the decision-making processes include the use of appropriate channels, and did it offer sufficient timeframes to engage with identified consumers?	4	-	5	5	4	5	<b>4.6</b>
Did the decision-making process engage with and consider a range of different consumer options?	5	-	5	3	5	3	<b>4.2</b>
Do final decisions appropriately respond to consumer feedback?	5	3	5	5	4	5	<b>4.5</b>
Is the level of detail and complexity of information provided to consumer groups appropriate?	5	5	3	5	4	5	<b>4.5</b>
<b>Average score per document</b>	<b>4.8</b>	<b>4.3</b>	<b>4.6</b>	<b>4.6</b>	<b>4.5</b>	<b>4.6</b>	<b>4.6</b>

**Note:** A dash (-) indicates that the dimension was deemed not applicable for this document.

For document 2.1 (stress tests remain unchanged), the Authority was not required to consult with participants on its decisions. We have therefore not scored the document on the two dimensions relating to the engagement process.



# Assessment of trust and confidence

## Introduction

The Authority considers that high levels of trust and confidence help drive action and acceptance, and reduce the need for intervention. It seeks to build trust and confidence in the industry through greater transparency, understanding and improved behaviours.

## Overview of selected documents

### **Document 3.1: GridEx 2023: an exercise to test readiness**

Notice of Transpower's biennial simulation exercise on 14 and 15 November 2023. The event is run by Transpower every two years. It simulates a real-world emergency affecting the energy system and tests the responses of industry and supporting agencies.

### **Document 3.2: Decision to clarify responsibility for retailer obligations**

Notice of the Authority's decision to amend two clauses in the Code. It related to two exemptions that were granted to enable a multiple trading relationship trial with Kāinga Ora and Ara Ake. The amendments clarified the retailer's obligations at an installation control point (ICP). Consultation was not required as the decision was technical and non-controversial. The notice included links to more information on the trial, and the decision paper for the amendment.

### **Document 3.3: New vectorised scheduling, pricing and dispatch model**

Notification that the Authority is updating its vectorised scheduling, pricing and dispatch model (vSPD). The Authority uses this mathematical model to simulate and analyse the New Zealand electricity market. The notice also invited vSPD users to participate in a workshop to provide feedback on proposed and other potential improvements to the model.

### **Document 3.4: Feedback sought on the future operation of New Zealand's power system**

Announcement that the Authority is opening consultation on the future operation of New Zealand's power system. It included a link to more information about the consultation, the consultation document, and an invitation to a webinar. The consultation page (updated after this notice) contained the webinar slides and Q&As. It also offered individual and group briefings.

Future system operation is a workstream under the Authority's Future security and resilience work programme. The project aims to identify challenges and opportunities with current power system arrangements and identify if any regulatory changes are needed to address these challenges. It was



initiated in response to stakeholder feedback seeking a coordinated approach to the evolving power system; and the Authority's desire to take into account relevant international developments.

### **Document 3.5: Annual review of the system operator's performance**

Announcement that the Authority completed its annual review of the system operator's performance. It set out the Authority's overall assessment and recommendations, and provided a link to the review document.

### **Document 3.6: Electricity Authority will investigate possible undesirable trading situation**

Press release that the Authority has decided to investigate a possible undesirable trading situation (UTS), following a High Court decision on scarcity pricing over four trading periods on 9 August 2021.

The press release contained a link to the earlier UTS investigation. That page included information about the UTS claim, the Authority's preliminary decision, submissions and supplementary consultation, and its final decision, which was that no UTS occurred. This decision, along with decisions relating to a pricing error claim for the same date, was appealed, leading to a High Court decision in February 2023.

## **Findings for Measure 3**

### **Is the target audience identified and understood?**

The overall score for this dimension was 5.0 out of 5.

The sampled documents demonstrated that the target audiences were well identified and understood. For example, for the notice about the new vectorised scheduling, pricing and dispatch model (vSPD), the target audience was technical users of vSPD. The vSPD provides transparency and value to these target users. The code is open source, the data gets published, and the model gets audited. This transparency and accessibility will help support trust and confidence in both the Authority and the sector.

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

The overall score for this dimension was 3.8 out of 5.

The key reasons for the lower score on this dimension were the accessibility of material, in terms of:

- effectively communicating technical material, and



- meeting Government Web Accessibility Standards.<sup>4</sup>

For example, the consultation paper on the future operation of the power system (document 3.4) does a good job of explaining the power system to support readers' understanding of the system. However, it was a text-heavy document and could have benefitted from more use of graphics to help illustrate aspects of the system. We note that additional graphics were developed for the 27 February 2024 webinar. Given the desire to broaden reach beyond the usual stakeholders (existing distributors) the accessibility of the webinar could have been improved. For example, the uploaded recording could have included captions, and the presentation could have explained more of the technical terms. Nevertheless, the consultation achieved a good response from a wide range of stakeholders, with 94 participants in the webinar and 53 submissions.

### **Is the material likely to improve the target audience's understanding of the EA, industry or sector?**

The overall score for this dimension was 4.0 out of 5.

The main shortcoming that we identified for this dimension was around providing sufficient context and supporting information, so that each notice and web page is self-contained. This includes providing links and ensuring that the website is easy to navigate when searching for particular topics or documents.

For example, in the announcement about the annual review of the system operator's performance (document 3.5), while the process and findings are made transparent, both the notice and the review could have provided more information to better support trust and confidence. The notice could have provided more contextual information, including the statutory basis for the annual review and self-review under the Code. It would also have been helpful for the notice to include a link to the system operator's self-review, and the system operator service provider agreement (both of which are published elsewhere on the Authority's website). The review document itself could have set out the matters that the Authority must take into account in the review (Clauses 7.8 and 7.9 of the Code), explained the approach taken, and provided an acquittal against the review considerations (for example, whether there were any complaints about the system operator over the assessment period).

## Summary of scores for Measure 3

<b>Measure 3 overall score</b>	<b>4.3</b>
------------------------------------	------------

<sup>4</sup> [Web Accessibility Standard 1.1 | NZ Digital government.](#)



**Table 7: Scores for Measure 3**

Documents	3.1	3.2	3.3	3.4	3.5	3.6	Average score per dimension
Is the target audience identified and understood?	5	5	5	5	5	5	<b>5.0</b>
Is the level of detail and complexity appropriate for the target audience and delivery channel?	4	4	4	3	3	5	<b>3.8</b>
Is the material likely to improve the target audience's understanding of the EA, industry or sector?	3	4	5	4	3	5	<b>4.0</b>
<b>Average score per document</b>	<b>4.0</b>	<b>4.3</b>	<b>4.7</b>	<b>4.0</b>	<b>3.7</b>	<b>5.0</b>	<b>4.3</b>





# Assessment of low-emissions energy

## Introduction

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.

As explained in the first chapter, measure 4 uses a previously established methodology to assess the quality of policy processes related to facilitating the transition to low-emissions energy. The assessment methodology does not evaluate the relevance, coherence or effectiveness of the Authority's work programme to support this transition. It may be timely for the Authority to undertake a more substantial assessment of its performance against impact measure 4.

## Overview of selected documents

### **Document 4.1: Issues paper – Targeted improvements through distribution pricing reform**

Release of consultation paper on proposed changes to distribution pricing. The paper stated that there will be an initial five-week consultation period, including a webinar, followed by two weeks for cross-submissions (so stakeholders can provide feedback on feedback received).

### **Document 4.2: MEP registry obligations for dynamic load control**

Notice that the Authority's Compliance Manager has issued a memo to approved auditors and metering equipment providers (MEPs). It contained a link to the memo.

The memo explained that significant innovation is occurring with controlling load at individual ICPs on request. MEPs are now implementing a dynamic load control service that will allow retailers or other third parties (such as flexibility services aggregators) to further control the same load.

### **Document 4.3: Let the sun shine!**

Article announcing that the first megawatts of solar power have been generated and sold on the New Zealand wholesale electricity market. It also provided background on the history and future of solar power in New Zealand, including how it can contribute to the transition to low-emissions energy, as well as the challenges it poses for the electricity system. The article provided a link to a paper on New Zealand wind and solar generation scenarios, prepared by the Authority.



#### **Document 4.4: Decision on dispatch notification enhancement and clarifications**

Notice of the Authority's decision on Code amendments to the dispatch notification product. The notice included links to the consultation page and the decision paper.

The dispatch notification product provides a low-cost path for owners or aggregators of small-scale and flexible generation resources, such as electric vehicle chargers and solar installations, to directly participate in the wholesale electricity market. The amendments aim to reduce the barriers to participation for load aggregators and clarify participants' obligations in line with the existing policy intent.

#### **Document 4.5: Decision on TPM amendment on allocation charges**

Notice of the Authority's decision to correct an issue with benefit-based charges applied to new transmission customers when they connect to the grid, under the transmission pricing methodology (TPM) simple method adjustment provisions. The issue with the adjustment formula was identified by Transpower. It could have led to unintended consequences, by disincentivising market entry and investment in new generation. The notice included links to the consultation page and decision paper.

#### **Document 4.6: Authority finalises response to MDAG report**

Announcement of the Authority's responses to the Market Development Advisory Group's (MDAG) report *Price discovery in a renewables-based electricity system*. The MDAG report made a suite of 31 recommendations for strengthening the wholesale electricity market so it can respond to the challenges from a high renewables-based electricity system. The announcement sets out the sequence in which it will implement the recommendations. It included a link to the MDAG report. It indicated that the Authority will be engaging with participants and other stakeholders in the next few months.

## **Findings for Measure 4**

### **Is there a clear problem definition and are identified outcomes related to low-emissions transition?**

The overall score for this dimension was 4.7 out of 5.

The sampled documents showed clear problem definition and desired outcomes. For example, the article "Let the sun shine" (document 4.3) clearly identified the opportunities for solar power to contribute to low-emissions transition, and dry-year generation. It also canvassed the problems that solar power presents as an intermittent energy source.

### **Was an appropriate range of options and statutory powers considered?**

The overall score for this dimension was 4.2 out of 5.



The documents reviewed provided evidence of the Authority being responsive to issues relating to low-emissions transition, as they arose. They also illustrated some of the challenges faced by the Authority in ensuring that new technologies and emerging market developments, including those that can support the transition to low-emissions energy, can be enabled within the existing Code.

For example, the memo on MEP registry obligations for dynamic load control (document 4.2) was issued in response to a request from an MEP, to clarify the registry requirements for dynamic load control services. This demonstrates the Authority's responsiveness to industry, and commitment to regulatory clarity and transparency. The resulting clarification will help facilitate innovation and the use of technology in controlling consumer load.

The notice on dispatch notification enhancement and clarifications (document 4.4) explains the Authority's amendments to the dispatch notification product. The amendments aim to facilitate earlier access of distributed energy resources and demand flexibility to the wholesale market. The clarifications were required due to oversights in an earlier Code amendment (that introduced the dispatch notification product), which had unintended consequences. This is another example of the challenges faced by the Authority in ensuring the Code enables new and innovative market developments.

We heard from both internal and external interviewees that changes such as electrification are occurring at a rapid pace, and the transition is "occurring now." External stakeholders are looking to the Authority to take more of a leadership role in the transition to a low-emissions energy system, including safeguarding the interests of consumers for a Just Transition.<sup>5</sup>

This includes taking a clearer strategic direction, and anticipating regulatory changes in a more structured and proactive fashion (rather than processing exemptions as the need becomes apparent).

## **Has appropriate stakeholder engagement been conducted?**

The overall score for this dimension was 4.7 out of 5.

The documents assessed demonstrated appropriate stakeholder engagement. For example, the TPM amendment on allocation charges (document 4.5) involved an amendment that was technical and non-controversial, and therefore exempt from consultation requirements (under section 39(3)) of the Electricity Industry Act 2010. Nevertheless, the Authority did consult on the proposed correction, so it could consider feedback from stakeholders, particularly on the technical aspects of the proposal. The consultation paper received one submission, from Meridian. Meridian submitted that it supports this kind of consultation rather than relying on the exceptions to consultation obligations.

In external interviews, stakeholders told us they are keen for the Authority to make greater use of engagement formats other than formal written submissions processes. They particularly value meetings and face-to-face engagements, free and frank discussions, and ongoing relationship building.

<sup>5</sup> <https://www.un.org/development/desa/dpad/wp-content/uploads/sites/45/CDP-excerpt-2023-1.pdf>



# Summary of scores for Measure 4

<b>Measure 4 overall score</b>	<b>4.5</b>
--------------------------------	------------

**Table 8: Scores for Measure 4**

<b>Documents</b>	<b>4.1</b>	<b>4.2</b>	<b>4.3</b>	<b>4.4</b>	<b>4.5</b>	<b>4.6</b>	<b>Average score per dimension</b>
<b>Dimension</b>							
Is there a clear problem definition and are identified outcomes related to low-emissions transition?	5	5	5	4	4	5	<b>4.7</b>
Was an appropriate range of options and statutory powers considered?	5	4	5	3	3	5	<b>4.2</b>
Has appropriate stakeholder engagement been conducted?	4	4	5	5	5	5	<b>4.7</b>
<b>Average score per document</b>	<b>4.7</b>	<b>4.3</b>	<b>5.0</b>	<b>4.0</b>	<b>4.0</b>	<b>5.0</b>	<b>4.5</b>



# Opportunities for learning and improvement

## The assessment results show continued improvement

The chart below presents the results across the four years that MartinJenkins has conducted these assessments (Figure 2). It shows that, across this time period, the Authority has improved its performance against each of these impact measures.

In this final section, we discuss some opportunities for the Authority to build on these results and continue to improve its performance.

**Figure 2: Overall scores compared to previous years' assessments**



**Note:** Measure 4 was introduced in 2022.



## Increased focus on small business consumers

There is scope for the Authority to grow its understanding of and engagement with small business consumers. This is relevant to projects and work streams with objectives and levers for directly influencing outcomes for these consumers, in their dealing with industry participants. The needs of, and impacts on, small business consumers were not covered in depth in the relevant documents we reviewed.

Eliciting the perspectives of small business consumers may become more difficult with the wind-up of the Consumer Advocacy Council (announced in Budget 24), which represented the interests of both small business and residential electricity consumers. The Authority will need to consider what structures and processes it will use to listen to the voices of small business consumers. For example, how it will use its new Advisory Group to elicit and incorporate perspectives from a diverse range of residential and small business consumers into its work.

## Less formal and more direct engagement methods

There is opportunity for the Authority to become more visible and broaden its outreach.

The Authority should continue to build on and learn from its engagement exercises. It will need to ensure engagement channels are tailored and relevant to small business consumers, who are likely to be time poor and have limited capacity to engage. For example, the Authority could consider using simplified survey forms, promulgated through social and news media platforms, to help reach a wider range of residential and small business consumers.

There is appetite among external stakeholders for the Authority to make greater use of less formal and more direct engagement methods, including regular and ad hoc meetings. They are also keen for more proactive updates on its work programme.

## Balancing reactive and proactive work

While the Authority has an annual programme for its regulatory policy work, we understand that it lacks an organisation-wide forward research programme. Specific research is undertaken on a project-by-project basis. It could be useful for the Authority to develop an overview of planned research work across its functions. This would help it prioritise and identify gaps, and allocate resourcing to ensure reactive work doesn't crowd out more longer-term thinking. In turn, this could help support the Authority take more of a proactive role in the transition to low-emissions energy.



## Lifting transparency

As noted earlier, much of the Authority's work is highly technical. Things that can help make technical material more accessible are:

- short, plain English summaries, that explain the context, drivers and rationale for the work, the objectives, and how it fits with other related work streams
- avoiding jargon where possible, and explaining it where necessary
- use of graphics and charts, and
- linking to background or supporting information (so each item is self-contained, and readers don't have to go searching for information).

Some documents we reviewed included a timeline of the decision-making process. It would be useful to include information in this format more often, as lack of transparency around next steps can undermine stakeholders' trust and confidence.

More broadly, the Authority could ensure that its consultation calendar that it publishes jointly with the Commerce Commission is kept up to date, and that major consultation activities are coordinated as best as possible with that of other key regulators in the sector.

## Improving the accessibility of web content

Particular efforts are needed to make it easier for consumers and other stakeholders with disabilities to engage in the Authority's processes. We make the following specific suggestions:

- including captions on webinars and other types of video content
- to meet government web accessibility guidelines, PDFs and MS Office documents should include accessible HTML versions, and
- PowerPoint slides are not fully accessible. Measures to help support accessibility include having sufficiently large fonts, and adequate colour contrast.



# Appendix 1: Assessment dimensions and criteria

## Measure 1

### Consumer-centricity: Our decisions improve the way the sector meets consumers' needs

Table 9: Assessment of the quality of our decision-making processes on meeting consumers' needs

Dimension	Rating	1	2	3	4	5
1. 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
2. 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
3. Was 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
4. 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
5. Were the decision-making processes clearly documented?		No documentation of the rationale and how the decision was reached	-	Some documentation of the rationale and how the decision was reached	-	A comprehensive description of the rationale and how the decision was reached





## Measure 2

### Consumer-centricity: Consumers are engaged with through our decision-making processes

**Table 10: Assessment of the quality of our engagement with consumers in our decision-making processes**

Dimension	Rating	1	2	3	4	5
1. <b>Is there clear rationale for which groups are engaged and to what extent?</b>		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
2. <b>Did the decision-making process include the use of appropriate channels, and did it offer sufficient timeframes to engage with identified consumers?</b>		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
3. <b>Did the decision-making process engage with and consider a range of different consumer opinions?</b>		The decision-making process does not engage with or consider a range of differing consumer opinions	-	The decision-making process engages with some and considers a decent range of differing consumer opinions	-	The decision-making process engages with and considers a large range of differing consumer opinions
4. <b>Do final decisions appropriately respond to consumer feedback?</b>		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
5. <b>Is the level of detail and complexity of information provided to consumer groups appropriate?</b>		The level of detail and complexity is not appropriate for consumer groups	-	The level of detail and complexity is somewhat appropriate for consumer groups	-	The level of detail and complexity is appropriate for consumer groups



## Measure 3

### Trust and confidence: The EA and our actions promote trust and confidence

**Table 11: Assessment of the quality of material produced (e.g. EMI reports, thought pieces)**

Dimension	Rating	1	2	3	4	5
1. <b>Is the target audience identified and understood?</b>		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
2. <b>Is the level of detail and complexity appropriate for the target audience and channel of delivery?</b>		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
3. <b>Is the material likely to improve the target audience's understanding of the Electricity Authority, industry, or sector?</b>		The material is unlikely to improve the target audience's understanding of the Electricity Authority, industry, or sector	-	The material is likely to somewhat improve the target audience's understanding of the Electricity Authority, industry, or sector	-	The material is highly likely to significantly improve the target audience's understanding of the Electricity Authority, industry, or sector



## Measure 4

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

**Table 12: Assessment of the ability of market settings to facilitate an efficient transition to low-emissions energy**

Dimension	Rating	1	2	3	4	5
1. <b>Is there a clear problem definition and are identified outcomes related to low-emissions transition?</b>		The problem definition and outcomes are unrelated to low-emission transition	-	The problem definition and outcomes are somewhat related to low-emissions transition	-	The problem definition and outcomes are clearly and significantly related to low-emissions transition
2. <b>Was an appropriate range of options and statutory powers considered?</b>		There are no options identified and statutory powers considered	-	There are some options identified and statutory powers considered	-	There are a comprehensive set of options identified and statutory powers considered
3. <b>Has appropriate stakeholder engagement been conducted?</b>		No stakeholder engagement has been conducted	-	Some stakeholder engagement has been conducted	-	A comprehensive level of stakeholder engagement has been conducted



## Appendix 2: Sampled documents

Table 13: Sampled documents

Strategic objective	Type	Title/Subject	Workstream	Link	Month published	Business unit
Consumer Centricity	Market Commentary	The changing nature of electricity demand in Aotearoa	Eye on electricity	The changing nature of electricity demand in Aotearoa   Electricity Authority	Jul-23	Monitoring
	Published material	Shift your electricity use and help the New Zealand system	Dispatchable demand enhancements	Shift your electricity use and help the New Zealand system   Electricity Authority	Jul-23	Operations Policy
	Industry collaboration	Solar energy sharing for social housing trial	Multiple trading relationships	<a href="https://www.ea.govt.nz/news/general-news/solar-energy-sharing-for-social-housing-trial/">https://www.ea.govt.nz/news/general-news/solar-energy-sharing-for-social-housing-trial/</a>	Jul-23	Compliance
	Industry guidance	Stress tests remain unchanged	Wholesale market competition	Stress tests remain unchanged   Electricity Authority (ea.govt.nz)	Aug-23	Wholesale Policy / Operations Policy
	Consultation	Distribution pricing forums – request for feedback	Distribution pricing reform	Distribution pricing forums – request for feedback   Electricity Authority (ea.govt.nz)	Oct-23	Network Pricing
	Media release	Authority identifies issue with WACC that could affect 2025 transmission prices	Transmission pricing methodology	Authority identifies issue with WACC that could affect 2025 transmission prices   Electricity Authority (ea.govt.nz)	Nov-23	Network Pricing
	Decision	Three winter 2023 options to be retained	Managing peak winter electricity demand	Three winter 2023 options to be retained   Electricity Authority (ea.govt.nz)	Dec-23	Operations Policy
	Decision	Improving electricity consumer protections and choice	Consumer care reform	Improving electricity consumer protections and choice   Electricity Authority (ea.govt.nz)	Feb-24	Retail and Network Policy
	Consultation	Consumer plan comparison and switching	Consumer care reform	Consumer plan comparison and switching   Our consultations   Our projects   Electricity Authority (ea.govt.nz)	Feb-24	Retail and Network Policy
	Published material	Disconnection, debt and consumer care data	Retail market monitoring	Disconnection, debt and consumer care data   Electricity Authority (ea.govt.nz)	Feb-24	Retail and Network Policy
	Industry guidance	Reminder: EIEP5A changes for distributors from 1 April 2024	Changes to EIEP1 and EIEP5A	Reminder: EIEP5A changes for distributors from 1 April 2024   Electricity Authority (ea.govt.nz)	Mar-24	Retail and Network Policy
	Industry collaboration	Electricity consumer and industry wānanga	Energy hardship	Electricity consumer and industry wānanga   Electricity Authority (ea.govt.nz)	Apr-24	Market Policy
	Trust and Confidence	Code amendment decision	Decision to clarify responsibility for retailer obligations	Addressing regulatory issues for distributed energy resources	Decision to clarify responsibility for retailer obligations   Electricity Authority (ea.govt.nz)	Sep-23
EMI Pre-existing		New vectorised scheduling, pricing and dispatch model	Data transparency, insights and automation	New vectorised scheduling, pricing and dispatch model   Electricity Authority (ea.govt.nz)	Dec-23	Data and Information Management
Transformational projects		Feedback sought on the future operation of New Zealand's power system	Future security and resilience	Feedback sought on the future operation of New Zealand's power system   Electricity Authority	Feb-24	Future Security and Resilience



Strategic objective	Type	Title/Subject	Workstream	Link	Month published	Business unit
<b>Trust and Confidence</b>	Post-implementation review	Annual review of the system operator's performance	System operator performance	Annual review of the system operator's performance   Electricity Authority (ea.govt.nz)	Feb-24	Commercial
	Industry collaboration	GridEx 2023: an exercise to test readiness	Security of Supply	GridEx 2023: an exercise to test readiness   Electricity Authority	Sep-23	Commercial
	Investigation result	Electricity Authority will investigate possible undesirable trading situation	Compliance notification	Electricity Authority will investigate possible undesirable trading situation   Electricity Authority (ea.govt.nz)	Mar-24	Compliance
<b>Low-Emissions Energy</b>	Issues paper	Issues paper - Targeted improvements through distribution pricing reform	Distribution pricing reform	Issues paper - Targeted improvements through distribution pricing reform   Electricity Authority (ea.govt.nz)	Jul-23	Network Pricing
	Industry guidance	MEP registry obligations for dynamic load control	Compliance notification	MEP registry obligations for dynamic load control   Electricity Authority (ea.govt.nz)	Aug-23	Compliance
	Market Commentary	Let the sun shine!	Eye on electricity	Let the sun shine!   Electricity Authority (ea.govt.nz)	Dec-23	Monitoring
	Code amendment decision	Decision on dispatch notification enhancement and clarifications	Addressing regulatory issues for distributed energy resources	Decision on dispatch notification enhancement and clarifications   Electricity Authority (ea.govt.nz)	Jan-24	Operations Policy
	Decision	Decision on TPM amendment on allocation charges	Transmission pricing methodology	Decision on TPM amendment on allocation charges   Electricity Authority (ea.govt.nz)	Feb-24	Network Pricing
	Transformational projects	Authority finalises response to MDAG report	Pricing in a renewables-based electricity system (MDAG 100% renewables)	Authority finalises response to MDAG report   Electricity Authority (ea.govt.nz)	Mar-24	Wholesale Policy



# MARTIN JENKINS



**Wellington** T +64 4 499 6130

Level 1, City Chambers, Cnr Johnston and Featherston Streets, Wellington 6011, PO Box 5256, Wellington 6140, New Zealand

**Auckland** T +64 9 915 1360

Level 16, 41 Shortland Street, Auckland 1010, New Zealand

[info@martinjenkins.co.nz](mailto:info@martinjenkins.co.nz) [martinjenkins.co.nz](http://martinjenkins.co.nz)