



28 July 2025

By email policyconsult@ea.govt.nz

Cortexo submission to the Electricity Authority's evolving multiple retailing and switching consultation

We appreciate the opportunity to comment on the evolving multiple retailing and switching consultation. We have made general comments below as we are not involved in any aspects of switching.

Cortexo considers the idea of multiple trading relationships (MTR) and its potential upside to be very important. MTR is essential to increase competition and unlock services for consumers to access benefits for themselves.

We think the monopoly of the connection point needs to be broken through the development of MTR. We agree with the Authority's Option 1 and the initial step to start with separating import and export to unlock the services to be made available for each. We also think the journey should be to progress MTR mechanisms through the stages described in the consultation paper.

Cortexo expects that in the future, it will mean incumbent retailers will need to start competing at the same ICP to provide services to the customer at the same, or better, price or quality that some other, potentially new and innovative party can. This will benefit competition.

We believe that traders should not be able to prevent MTR from occurring at a connection point. We are unsure of the Authority's intention regarding this matter, but we don't believe a trader should be able to reject providing a basic (import) connection if the customer is engaging with an MTR partner for export purposes. Even though a different retailer may be happy to step in, the possibility of a change in their current import retailer could potentially lead to barriers for consumers. They may be unwilling to try something new as it could be perceived as risky, e.g., will they lose power for a period, so we suggest the Authority take care with the rules it establishes for MTR. The rules must consider future services, not just the separation of import/export.

We have not made comments on the technical changes to switching processes, as this is not our area of expertise.

We further note a number of consultations released by the Authority recently as being interlinked, and we would like our submissions on the decentralisation and digitalisation discussion papers to be considered alongside the above comments.

If you wish to discuss the content of this submission further, please contact the undersigned.

Regards,

Terry Paddy
Managing Director

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