

Electricity Authority Te Mana Hiko
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Via email: policyconsult@ea.govt.nz

28 July, 2025

To whom it may concern,

Thank you for the opportunity to provide feedback on the Authority's consultation on consumer mobility and multiple trading relationships.

We support the Authority's efforts to improve the electricity market for consumers. The proposed changes to the switching process are sensible and will deliver benefits to customers through faster, more efficient processes. These improvements are long overdue and we encourage the Authority to implement them as soon as possible.

We are supportive of the concept of multi trader relationships however we think there are higher priorities for the Electricity Authority because multi trader relationships will appeal to a very limited market. Our view is that the Authority's resources would be better focused on initiatives that will benefit all consumers, such as the switching improvements, modernising the registry and data flows, and the Consumer Data Right work. In addition further work needs to be done to consider the allocation of costs and risk in multi trader scenarios.

Please see our responses to questions in the below table.

Kind regards,

Steve Young

Head of Data and Industry Operations

Questions on the Authority's vision	
Q1. (Paragraph 2.20) Do you agree with the Authority's vision for consumer mobility?	We generally support the Authority's vision. Enabling informed consumer choice and making improvements to the efficiency of the switching

If not, what would you change and why?

process are things we fully support.

We fully support most of the proposed changes to the switching process. The current timeframes for the switch process are too long and result in customers contacting the gaining retailer multiple times to check on progress.

There is significant wasted effort and re-work in the current system. Given the prevalence of smart meters, the amount of time wasted on RRs to round-down actual switch reads by less than 1kWh is ridiculous. While most of these changes are not visible to consumers, improvements behind the scenes, will make the customer experience faster and smoother.

While we support the general concept of Multiple Trader Relationships, at this stage we believe MTR would appeal to a very niche set of consumers and the Authority would be better prioritising effort and resources elsewhere.

Currently a relatively small percentage of consumers have generation and, as evidenced by the popularity of bundling and our experience of consumers' general unwillingness to even separate their electricity and gas retailers, further splitting your utilities relationships is a very niche requirement. In this proposal the greatest impact will come from the switching process improvements outlined in this proposal and the Consumer Data Right work with MBIE along with the Authority's new comparison site. These projects can make a material difference to switching for all consumers.

Q2. (2.20) Do you have any comments regarding future stages of multiple trading, whether the proposal provides optionality for the potential future stages, and the options the Authority should consider?	<p>As outlined in Q1, we believe multiple trading should not be a priority at this point. This should be revisited in the future once there is more of a market for it.</p> <p>We believe the MTR concept would benefit from more 'testing' where some of the inevitable challenges around apportionment or costs and risk management are resolved.</p>
Questions on Multiple trading	
Q3. (3.26) Do you agree with the proposed solutions? If not, what would you change and why?	<p>While we generally agree with the principles behind MTR we do not see a pressing need for it at this stage. It introduces another level of operating complexity while only serving a small fraction of consumers. We strongly recommend putting MTR on the back-burner in favour of other priorities that will benefit all consumers.</p>
Q4. (3.26) Do you agree with the benefits anticipated from the proposed solutions? Are there other benefits you can anticipate or improvements to operational effectiveness and efficiency? Can you quantify these benefits?	<p>We believe the benefits are overstated for now. There is a very limited pool of customers with generation. Of those we doubt that many consumers would see having different retailers for consumption and generation as a major benefit. We acknowledge that MTR may appeal to a small group of highly engaged, and enthusiastic consumers.</p>
Q5. (3.26) Do you anticipate the proposed solutions will introduce cost into your organisation, and if so, can you quantify this cost and/or provide a high-level description of the changes that need to be made?	<p>There will undoubtedly be costs involved in implementing and managing this. We also foresee ongoing complexity around retailer responsibilities and the likelihood that this will create a worse customer experience with consumers being pushed from one side to the other to solve issues. While the Authority's proposal attempts to define where responsibilities lie, the average consumer is not going to know who to contact in the first instance. Additionally there is no consideration of the interplay</p>

	between distributed generation and consumption on the same site - this has implications for risk management decisions. We think this needs to be explored through a further iteration of MTR trials before it is codified.
Q6. (3.47) Do you agree options 2 and 3 are not preferred? If not, why not and how would you overcome the disadvantages?	N/A
Q7. (3.47) Do you agree that option 1 is the preferred option over options 2 and 3 and the reasons for preferring option 1? If not, why not?	No - see all our other comments on MTR.
Questions on trader switching	
Q8. (4.55(q)) Should the provision of the average daily consumption remain mandatory, or should it be optional? If optional, please explain why?	It should remain mandatory.
Q9. (4.55(q)) Do you agree with the proposal to align timeframes to a maximum of two business days for NT and AN notifications, and to reduce timeframes for the CS file?	We have no issues with the proposed timeframes. When it comes to reviewing performance against these requirements in the participant audit, we would encourage the Authority to be pragmatic with the risk/impact weightings for breaches in this area. With the timeline being shortened significantly the percentage allowance for missing deadlines should be reviewed.
Q10. (4.55(q)) Do you agree with the proposed solutions?	We support the MEP providing switch reads to both retailers. Retailers should be required to accept reads

<p>If not, what would you change and why?</p>	<p>with decimal places. There should be no more RRs to round down to the nearest whole number.</p> <p>There may be some difficulties complying with the AN response codes in table 4.48 - for example PD (disconnected) we may have asked for a manual disconnection but not received the paperwork back yet, or AD (metering differs) there could be a metering service order scheduled but we don't know if it's completed yet. This would require instant communication from MEPs or their contractors on-site to deliver these response codes with any level of certainty.</p> <p>Where CP or CO (either of the contracted customer) codes are used it would be useful to provide the "contracted until" date to enable the gaining retailer to liaise with the customer regarding a potential delay to the switch date to see out the remainder of their contract.</p>
<p>Q11. (4.55(q)) Do you agree with the benefits anticipated from the proposed solutions? Are there other benefits you can anticipate or improvements to operational effectiveness and efficiency? Can you quantify these benefits?</p>	<p>We generally agree. We are particularly in favour of the MEP providing binding switch reads and the increase to two decimal places for switch reads. Largely removing RRs from the process will be good for everyone.</p>
<p>Q12. (4.55(q)) Do you anticipate the proposed solutions will introduce cost into your organisation, and if so, can you quantify this cost and/or provide a high-level</p>	<p>There may be some initial set-up costs but these should be offset by the ongoing efficiencies.</p>

description of the changes that need to be made?	
Questions on MEP switching	
Q13. (5.34) Are there any other files that should be added to this list?	No
Q14. (5.38) Do you agree with the proposed solutions? If not, what would you change and why?	N/A
Q15. (5.38) Do you agree with the benefits anticipated from the proposed solutions? Are there other benefits you can anticipate or improvements to operational effectiveness and efficiency? Can you quantify these benefits?	We broadly agree. In particular allowing MEPs to change the MEP for an ICP on the Registry to another of their own participant identifier will save retailers unnecessary work.
Q16. (5.38) Do you anticipate the proposed solutions will introduce cost into your organisation, and if so, can you quantify this cost and/or provide a high-level description of the changes that need to be made?	No. Unless MEPs decide to increase their costs for providing switch reads or changing participant identifiers. It is our view that they should not charge additionally as they are already providing us the reads and changing participant codes themselves is probably faster and cheaper than compiling a list and asking the various Retailers to do it for them.
Questions on distributor switching	
Q17. (6.13) Do you agree with the proposed solutions? If not, what would you change and why?	N/A

Q18. (6.13) Do you agree with the benefits anticipated from the proposed solutions? Are there other benefits you can anticipate or improvements to operational effectiveness and efficiency? Can you quantify these benefits?	N/A
Q19. (6.13) Do you anticipate the proposed solutions will introduce cost into your organisation, and if so, can you quantify this cost and/or provide a high-level description of the changes that need to be made?	N/A
Questions on implementation	
Q20. (7.4) Would you prefer a single implementation or a staged implementation? Please give reasons for your preference	<p>A single implementation of the switching changes. We see significant benefits from these changes and no reason to delay them.</p> <p>Multiple trader changes should be postponed in favour of other priorities.</p>
Q21. (7.4) Do you agree with the suggested implementation timeframes? If not, please state your preferred timeframes and give reasons for your preference	
Questions on the regulatory statement	
Q22. (8.6) Do you agree with the objectives of the	We believe in the general concepts outlined, but we do not think the demand or benefit exists that would

proposed MTR amendments? If not, why not?	justify the added work and complexity the proposal entails. We also think the implications of MTR on risk management and cost allocation require further exploration in order to make them work. E.g. a commercial site with batteries, the cycling decisions will materially shift the risk management profile, if they choose to have multiple traders this adds another dimension that needs to be considered when pricing supply to the site.
Q23. (8.11) Do you agree with the objectives of the proposed amendments to the switching process? If not, why not?	Yes
Q24. (8.17(q)) Do you agree the benefits of the proposed amendment outweigh its costs?	We believe the switching proposals outweigh the costs, but not the multiple trader changes.
Q25. (8.21) Do have any comments on the preferred and alternative options discussed in the 2019 Issues paper?	N/A
Q26. (8.22(d)) Do you agree the proposed amendment is preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010.	N/A

Q27. (8.25) Do you agree the Authority's proposed amendment complies with section 32(1) of the Act?	N/A
Question on Code drafting	
Q28. (Appendix A) Do you have any comments on the drafting of the proposed amendment?	N/A