our energy

28 July 2025

Electricity Authority
Submitted via email: policyconsult@ea.govt.nz

Submission to the Electricity Authority's Evolving multiple retailing and switching consultation

Our Energy welcomes the opportunity to provide its views on the EA's Evolving multiple retailing and switching consultation. Since inception, Our Energy has been active (sometimes bordering on agitative) around the topic of multiple trading relationships (MTR). Our views are therefore grounded in very practical, on-market and off-market experience.

As a market regulator, consideration of rule changes associated with on-market activity are a natural part of the EA's role. As such, the EA views that the key to evolving multiple retailing options for consumers is to provide for changes to how, or perhaps as importantly, by who, the wholesale electricity market can be reconciled and settled. A critical question, however, must be whether this is the only (or most cost effective) solution for the identified problem(s)?

Our first read of the EA's consultation was that a sensible first step had been proposed, by splitting import and export, as has been done in the Kainga Ora trial. In other words, the proposal appeared to be to put an ICP on both the import and export channels, enabling them to be serviced by separate traders. But, on further review, the actual mechanics of implementing this option were not entirely clear to us. A similar observation applies for the later options that consider separating out the flexible resources in a home or business from the inflexible resources.

Our Energy was set up as a business in 2015-16, with a view that changes of this nature would be coming. Now in 2025 we are almost on the cusp of taking the first step, and in the intervening time Our Energy has had to be, as a business, imaginative and flexible to survive in an area and era where the change needed hasn't happened fast enough. There is plenty of talk about the disruption that this kind of change could have on existing businesses, but not as much focus on the new businesses and models that could be created through such change. But, are on-market rule changes like those proposed for evolving MTR the right way to go?

Our Energy's lived experience is that MTR is *not needed* to achieve the majority of what the EA, quite rightly, seems interested in, particularly when we also consider other related consultations about digitalisation and decentralisation. There's no doubt that various different rules and policies could have better supported the pioneering innovations that Our Energy has brought to market (ie, energy sharing / P2P / granular matching and Localflex). But, might significant changes to centralised market processes, such as what have apparently been proposed in this paper, actually hinder, rather than help, innovators like us?

For example, in the context of 'energy sharing' where an ICP with generation wants to trade with a regular consumption (import only) ICP, but those ICPs are with different traders, this can in fact be solved for off-market via solutions like our Lemonade platform. This is really data sharing / access problem than a market / trader problem *per se*. But, the practical issue is about getting those two traders to agree to support such an off-market trade between the ICPs - hence why we've long been supporters of enabling some form of MTR for this use case. But, with the right rules, policies and incentives, this could actually all be solved off market.

Paragraph 3.5 in the paper defines what the EA considers MTR to be (our italics added):

> MTR means the ability for *a customer* to have contracts with more than one retailer for different services at their property.

That is certainly one, relatively simple explanation. For Our Energy, however, the key use case is actually for *different customers to have different contracts with different retailers for different services* at a property. The clearest example of this is where a landlord could hold a customer contract with a retailer for the export and a tenant retains a customer contract for the import, as has occurred in the Kainga Ora project.

As above, however, this *could* actually be addressed if off-market trading was made easier through requiring data sharing and access to / with / by 3rd parties, which isn't necessarily a 'lack of MTR' problem. So, is the most cost effective regulatory alternative to evolving various MTR options actually to mandate all retailers / traders to cooperate with off-market solutions, so that they work (!) for households, businesses and communities? Doing so would, in our view, be more aligned with the financial sector's 'open banking' reforms.

We appreciate the opportunity to provide our perspective and welcome questions from the Authority on this submission at team@ourenergy.co.nz

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John Campbell
CEO & Founder, Our Energy

About Our Energy

Our Energy is an energy technology company created for people and communities producing their own electricity because they have restricted choice, control and transparency over who their energy is shared with. Our Energy has two main products:

1. Granular, time and location matching of clean energy supply and demand that supports energy communities and 'virtual rooftop' plans for retailers and renewable energy developers and their customers; and

2. Market operations and market development for Aotearoa New Zealand's first local flexibility market.

Our Energy is participating in the Power Innovation Pathway, the Authority's open front door for innovators to access regulatory advice and support to accelerate the introduction of new products and services to market which can deliver significant consumer benefits.