

29 July 2025

Pulse does not support multiple retailing and switching initiatives

Pulse Energy welcomes the opportunity to respond to the Electricity Authority's consultation on *Evolving Multiple Retailing and Switching*.

We agree that enabling customers to choose more than one retailer at their property may, in some cases, help deliver better value. However, we believe the overall benefit of separating consumption and distributed generation is negligible when weighed against the complexity, system costs and increased cost to serve New Zealand would need to incur to support multiple retailing.

We consider the benefits of separating import and export traders to be limited for the following reasons:

1. The number of customers with solar panel installations remains relatively small.
2. Separation between consumption and distributed generation can already be achieved under the current switching rules by introducing an additional ICP.
3. Much of the perceived benefit stems from the fact that some retailers offer attractive buyback rates but not competitive consumption rates, and vice versa. Some of this benefit can already be realised by switching retailers seasonally—between summer and winter.
4. Retailers offering high buyback rates but less competitive consumption rates are likely to adjust both rates downward as margin expectations shift.

Given New Zealand's relatively small population and market size, the benefits of deploying complex system solutions are likely to be marginal. We encourage the Electricity Authority to undertake a thorough cost-benefit analysis before proceeding with implementation.

Pulse supports modernising the existing trader and MEP switching arrangements.

Pulse would like to provide our views regarding to trader switching and MEP switching in a table format on the next page.

Evolving multiple retailing and switching - Format for submissions

Submitter	
Submitter's Organisation	Pulse Energy Alliance LP

Questions	Comments
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?	Remain mandatory for TR, can assist with more realistic read values for transfer switch sites with read issues. Optional for MI – The ADC is usually that of a previous owner/tenant and could be completely different for the new occupier.
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? Q10. (4.55(q)) Do you agree with the proposed solutions? If not, what would you change and why? 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? 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 description of the changes that need to be made?	<p>We can see that the changes being suggested while trying to streamline and create efficiency would come at a large cost to retailers.</p> <p>The large amount of change proposed to the end to end switching process will be high cost - due to system changes and resource needed to implement these changes when compared with the benefit that traders will receive.</p> <p>We believe that the cost of the suggested changes will heavily outweigh the benefit to both customers and traders.</p> <p>The inclusion of amending files to propose new switch dates and adding extra files and a third party (MEP) to the switching process, may create unnecessary complication and instead increase the time for completing switches and add inefficiency.</p> <p>Most retailers are now receiving reads from MEP's within 48 hours of the actual read date with most switches being completed within 5BD which may not have been the case in 2019. Remote smart reads are a key driver for this, and we do not see a need to add a third party into the switching process when retailers are already receiving this data.</p> <p>There is an opportunity instead for the EA to review some of the pain points and release a smaller more cost-effective change that will provide more benefit to both traders and retailers:</p> <p>Eg.</p> <ul style="list-style-type: none"> • Allowing attribute changes while a switch is in progress • Timestamp on registry for events • Expanding character limits on files • Hierarchy of the AN file codes so there is clear and consistent approach

	<ul style="list-style-type: none"> • Time stamp of reads as at 00:00 • RR response requirement to 5BD <p>We think reviewing and looking at some of the smaller changes like the ones above, that have a true impact to creating more efficiency in the process but also have a lower cost to implement without needing to overhaul the end to end switching process will be a much better outcome for traders and customers.</p>
Questions on MEP switching	
<p>Q13. (5.34) Are there any other files that should be added to this list?</p> <p>Q14. (5.38) Do you agree with the proposed solutions? If not, what would you change and why?</p> <p>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?</p> <p>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?</p>	<p>We agree with the changes proposed to the MEP switching process except for the inclusion of the MEP into the trader switching process.</p> <p>We believe the trader switching process should be managed between two traders who receive MEP information directly from the MEP. We believe adding a third party into the trader switching process will make this process inefficient and will create back and forth between traders and MEP's for exception handling.</p> <p>The cost of changing the switching process to allow for the integration of the MEP and the adaption to the process would be at a high cost that we don't believe is worth the benefit.</p>
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
<p>Q20. (7.4) Would you prefer a single implementation or a staged implementation? Please give reasons for your preference</p> <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</p>	<p>We think a smaller subset of changes is required with a review of the cost and benefit to traders and MEP's.</p> <p>The current proposed changes are a large overhaul of the end-to-end process which will require a large amount of system change and testing that will require longer than 9 months. The additional costs on system changes and support the more complex operation will eventually be past to New Zealand customers.</p>