

Evolving multiple retailing and switching - Format for submissions

Submitter	Gareth Williams
Submitter's Organisation	SEANZ

Submissions should be emailed to policyconsult@ea.govt.nz with "Consultation Paper— Evolving multiple retailing and switching" in the subject line by 5pm, Tuesday 22 July 2025.

Questions	Comments
Questions on the Authority's vision	
Q1. (Paragraph 2.20) Do you agree with the Authority's vision for consumer mobility? If not, what would you change and why?	We agree with the fundamental vision that consumers ability to compare plans, switch retailers and make choices that suit their objectives is valid
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?	Potentially there could be dynamic MTR provisions, so that customers can buy or sell energy from the "best value" retailer on a weekly daily basis. (e.g. retailers may offer special short term "deals" which customers can take advantage of – and would then revert to their default retailer at the end of the designated deal period)
Questions on Multiple trading	
Q3. (3.26) Do you agree with the proposed solutions? If not, what would you change and why?	Yes agree with the solutions described. Focussing initially on different retailers for import and export is the correct initial scope.
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?	Yes the benefits anticipated seem reasonable. Given import and export are metered through different channels we wouldn't see major complexity in implementing this.
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?	N/A

Q6. (3.47) Do you agree options 2 and 3 are not preferred? If not, why not and how would you overcome the disadvantages?	We do not see particular value in MTR for different loads. There may be different value to different retailers from being able to control different loads at different times. An effective national demand response market allowing customers with interruptible load to respond to a signal from, and be rewarded by, any party would be a preferable to specifically assigning the load to a retailer.
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?	Yes – it will have most benefit and will be the easiest to implement
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?	No view
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?	No view
Q10. (4.55(q)) Do you agree with the proposed solutions? If not, what would you change and why?	No view
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?	No view
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?	No view

Questions on MEP switching	
Q13. (5.34) Are there any other files that should be added to this list?	No view
Q14. (5.38) Do you agree with the proposed solutions? If not, what would you change and why?	No view
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?	No view
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 view
Questions on distributor switching	
Q17. (6.13) Do you agree with the proposed solutions? If not, what would you change and why?	No view
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?	No view
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?	No view

Questions on implementation	
Q20. (7.4) Would you prefer a single implementation or a staged implementation? Please give reasons for your preference	We believe it makes more sense to implement as a single project given the overlap between the changes needed.
Q21 (7.4) Do you agree with the suggested implementation timeframes? If not, please state your preferred timeframes and give reasons for your preference	18 months seems reasonable but timeframe should be set based on an analysis of tasks involved to validate that this cannot be achieved earlier.
Questions on the regulatory statement	
Q22. (8.6) Do you agree with the objectives of the proposed MTR amendments? If not, why not?	Yes, the objectives stated are appropriate.
Q23 (8.11) Do you agree with the objectives of the proposed amendments to the switching process? If not, why not?	Yes, the objectives stated are appropriate.
Q24 (8.17(q)) Do you agree the benefits of the proposed amendment outweigh its costs?	The financial cost and benefits are not defined so cannot be assessed. Intuitively the changes seem sensible and in the best interest of consumers.
Q25. (8.21) Do have any comments on the preferred and alternative options discussed in the 2019 Issues paper?	No view
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.	No view
Q27. (8.25) Do you agree the Authority's proposed amendment complies with section 32(1) of the Act?	No view

Question on Code drafting	
Q28. (Appendix A) Do you have any comments on the drafting of the proposed amendment?	No view