Retail market monitoring clause 2.16 information notice
Frequently asked questions

The Electricity Authority is introducing mandatory retailer reporting of domestic and small business customer data to increase transparency and accountability in New Zealand's retail electricity market. We are committed to supporting retailers as they prepare for their first data submission, due no later than 31 August 2025.

We have prepared a set of frequently asked questions to support retailers in implementing the new retail market monitoring clause 2.16 information notice.

We will begin publishing aggregated retail data and insights on our website towards the end of 2025.

For more information, visit the Electricity Authority's website.

Contents

1. Delivery

1.0. How do we get the details for the Secure Azure Storage or Secure File Transfer Protocol (SFTP) for the delivery of the files associated with the notice?

Data files are to be supplied to the Electricity Authority (Authority) via our SFTP facility.

When ready to start testing systems, retailers will need to get in touch with the Data Products team at the Authority using the data.products@ea.govt.nz email address to request a new SFTP user account.

When requesting access to the Authority's SFTP facility, please supply the following information:

- company name

- an email address – this needs to be a monitored service address, not an individual staff member's email address

- a contact name, ie, the name of a staff member that the Authority can contact. If more than one name is supplied, please list contact names in priority order

- an email address for each contact

- the static Internet Protocol (IP) address for the system that will be used to send files to the Authority. Send both a primary and a secondary IP address if more than one IP address is to be used. Send an IP range if files will originate from a range of IP addresses.

The Authority has both a UAT (User Acceptance Testing) and a production SFTP instance.

Any client tool compatible with SFTP protocols can be used to deliver files to the Authority.

1.1. Will the SFTP platform have an acknowledgement of receipt function?

Yes.

1.2. Can we split any larger tables (for example, table 5) into more than one file?

Yes, you can split a table into two or more files each month. But please make sure the file names are appended with _A, _B, _C, etc. For example:

RDRHHRM _YYYYMM_YYYYMMDD_HHMMSS_A.csv

RDRHHRM _YYYYMM_YYYYMMDD_HHMMSS_B.csv

For the A and B files each month, the year/month (highlighted portion of file name above) remains the same for both files.

1.3. If we have no data to report for a particular table (eg, no disconnections for non payment) should we submit an empty file or no file?

Our preference is for you to submit an empty file, so that we know that you have no data to report, rather than that table was accidentally omitted from the submission.

1.4. Does the file we provide need to exactly match the "Column name" in your specification for the file to be accepted by your system?

A header row should be included with names based on our notice. The column order in each file MUST match the column order in the notice.

However, the naming convention does not need to be exactly the same as the notice (eg, 'Column name' could be submitted as 'columnname', 'COLUMN NAME' or ' ColumnName'). The column names will primarily be used by the data products team to validate and debug the data.

2. Account information

2.0. What can we use for customer identifiers?

You can use any combination of numbers or characters to identify a unique customer, including existing internal identifiers such as a customer's account number. The identifier must not contain personal information about the customer.

The identifier should remain consistent for each customer where possible, even if they move address or leave and rejoin the same retailer.

2.1. Where do we include Voice over Internet Protocol (VoIP)? Is it covered by 'Internet'?

Please list 'VoIP' in the 'Other' column, where relevant.

2.2. Can we use separate Customer Identifiers based on our account ID for each individual and Installation Control Points (ICPs), even when an individual owns multiple properties with multiple ICPs?

If the billing information for each ICP is recorded separately, with each having their own account balance and bills, then use a separate customer identifier, even if the same individual owns multiple properties.

2.3. What do we report if a customer changes address during the month?

If a customer moves address but stays with the same retailer:

Table 1 – Please include all ICPs associated with the customer during the month in table 1.

Table 2 – Enter one row for each ICP. If you are the retailer for both the ingoing and outgoing customer account holder at a given ICP, you will need two rows for the ICP, one for each customer account.

Table 3 – If possible, please provide separate billing data for each ICP, with the dates corresponding to the move out and in dates.

Table 5 – Report half-hourly metering data for the original ICP up until the move out date, and half-hourly metering data for the new ICP from the move in date.

2.4. What should we do if we provide a new customer identifier to a customer when they move address?

Ideally, the customer identifier will stay the same if they move to a new address (and to a new ICP) but stay with the same retailer.

However, if this is not possible with your current system, you can provide a new customer identifier when the customer moves ICPs.

2.5. What do we report if a customer switches away?

Provide table 3 data as sent to the customer, and data in table 1, 2 and 4 as it was recorded prior to the customer switching. Provide half-hourly metering data (table 5) up to the switching date.

If there is any ambiguity about the data provided due to a customer switch, eg, data from two retailers overlap for the same ICP, we will use the register to determine the switch date.

2.6. **We have separate customer management systems for electricity and another service. Is it acceptable to record "Y" for a service only in cases where we are highly confident it is the same customer (eg, where the customer has advised us of their energy account numbers at the time they set up the other service)?**

Yes, this is acceptable, provided this will capture all instances where a customer is receiving a discount (on either service) for having both services, or where there is a single balance for both services.

3. Dealing with multiple ICPs per account

3.0. **How do I report accounts with more than one ICP?**

For table 1, please provide a list of every ICP associated with the account, space delimited.

For table 3, you can report by ICP or by account, in accordance with your billing system.

If more than one ICP is included in a bill please list each ICP, space delimited.

For tables 2, 4 and 6 please report by ICP.

3.1. **Should I report the total balance across multiple ICPs, or apportion the total balance across several ICPs?**

For table 3, if you have an account with multiple ICPs and a single balance across these ICPs, report the totals across all ICPs. This avoids needing to apportion a total balance across several ICPs.

Table 4 should be reported by ICP.

3.2. **How do we handle accounts with a large number of ICPs under a customer identifier? For example, some customers could have 50+ ICPs.**

(a) There may be instances where customers are technically part of the same account but you want to give the ICPs (or groups of ICPs) separate customer identifiers for the purpose of this notice. This can be done if they are invoiced separately and have separate balances.

If you still have accounts with more than 50+ ICPs that fall within scope of the retail data request, you can enter all ICPs as a space delimited list in Table 1 and Table 3. In Table 2 each ICP will have its own row – please ensure all ICPs link back to the correct customer identifier.

3.3. **For customer identifiers with multiple ICPs within the reporting month, how should the other columns in the table be populated where the response would differ between ICPs? For example, if one ICP is a medically dependent consumer and another is not.**

There may be instances where customers are technically part of the same account but where you may want to give the ICPs (or groups of ICPs) separate customer identifiers for the purpose of this notice.

This can be done if they are invoiced separately and have separate balances.

However, if you are unable to separate the account into unique customer identifiers, please answer 'Y' for each category in table 1 if it applies to at least one of the ICPs.

4. Business accounts

4.0. How do we decide which customer accounts are business accounts?

Please report in table 1 whether the account is classified as a business based on the information you hold. This should be determined by the customer at sign up. If an account has a mixture of ICPs, eg, some ICPs are recorded as a business premise and others as a domestic premise, report the account as a business.

If you don't record which accounts are business accounts, you may use the Australian and New Zealand Standard Industrial Classification (ANZSIC) codes to determine if an account is a business. More information on ANZSIC codes is available at www.stats.govt.nz

If an account is neither a domestic account nor a small business account it is out of the scope of this notice.

4.1. Why is the small business definition based on consumption at account level and not ICP level?

The Electricity Industry Act 2010 (Act) defines a small business consumer as one that is not a domestic consumer and which consumes less than 40 MWh of electricity per year. We have interpreted this to mean across the whole business where there are multiple ICPs.

If we define 40 MWh to be per ICP, we risk requiring data from ICPs which are part of large commercial or industrial contracts and are not intended to be captured by the Act.

Retailers can use discretion to add a buffer to the 40 MWh threshold to prevent businesses from fluctuating in and out of the small business definition. Once we have a year's worth of consumption data we can check and exclude businesses as appropriate.

4.2. What shall we do about businesses that have significant variation in consumption year to year?

Retailers may use a long-term average (up to 5 years) to determine which businesses meet the small business definition.

4.3. What do we do if we do not have the full 12 months of data to assess whether a business account is a small business?

For newly signed up business accounts you can assess based on similar businesses (such as those with the same ANZSIC code).

Otherwise, you can assess the likely annual consumption of the business based on current consumption across all ICPs and consumption patterns of similar businesses.

For business accounts assessed as likely to be close to the 40 MWh threshold, we advise these be included as small businesses. As mentioned above, it is the retailer's responsibility to define this buffer. Once we have collated a year's worth of consumption data, we can review and exclude businesses as needed.

4.4. Do we need to check the correct businesses were submitted in previous months (eg, if consumption levels changed after wash-up)?

We expect retailers to use reasonable care to ensure the correct business accounts are submitted each month based on the consumption over the past 12 months (or estimated annual consumption for new small business customers). However, we are not expecting retailers to make changes to submissions for previous months based on changes to businesses consumptions, including changes due to wash-ups. For example, if a business's previous annual consumption was 60 MWh but has since fallen, we suggest you start including the business account and associated ICPs in the month in which annual consumption (for the previous 12 months) falls below 40MWh.

The same should be done if a business's consumption is increasing, though we suggest having a small buffer to prevent businesses fluctuating in and out of the data collection. For example, if the annual consumption of a business is fluctuating between 38 and 42 MWh we would suggest including it in the dataset every month. However, if the consumption of the business grows and annual consumption is now between 42MWh and 46 MWh each month, we would suggest removing that business from the dataset.

5. Prepay / payment plans

5.0. Does prepay include all accounts of customers who pay ahead of consumption?

No, the prepay flag is intended only to indicate that the customer is on a product offering or contract which *requires* payment before electricity is consumed, and the customer is electrically disconnected if the customer's pre-paid credit expires, or any approved arrears limit is reached.

Customers who usually pay before a bill is issued but still receive a bill post-consumption, and have no risk of disconnection for non-payment before the bill is due, should not be flagged as prepay.

5.1. Does the payment support plan flag include all customers who pay weekly? What about customers on smooth pay?

No, the payment support plan flag only includes customers who have an agreed plan with the retailer due to experiencing or anticipating payment difficulty in relation to the supply of electricity.

Weekly payment options or smooth pay options which are offered to all customers (for example, at time of sign up) should not be flagged as being on a payment support plan.

6. Billing information

6.0. How many decimal places (dps) should we report for billing data?

Dollar values in table 3 should be reported to 2 dps, while kWh values (consumption and export) should be reported to 3dps. If more decimal places are reported than required, this will be rounded in our system.

6.1. Our opening balance will sometimes be a positive balance even though the customer has not yet been late in payment (eg weekly billing). How will the Authority report on this data?

The opening balance will be used to better understand customers who are falling behind on payments, as well as other behaviours, such as prepay behaviour. However, we are aware that not all customers with a positive opening balance will be in arrears or payment difficulty. After our initial processing and analysis of the data we will create one or more measures to be indicators for payment difficulties, but at this stage we cannot confirm what those will be.

6.2. How do we record non-monetary incentives?

We do not require retailers to report the monetary value of non-monetary incentives in table 3.

However, the retailer should indicate when a customer has received such an incentive in table 1 using the incentive flag. For example, if a customer received a 12-month subscription for another service, this flag should be 'Y' for those 12 months, and then 'N' from the 13th month onwards. If a customer received an appliance during their first month signed up, enter 'Y' for that first month then 'N' from the second month onwards (assuming no other incentives were received).

If a customer who has received a non-monetary incentive will be penalised for switching during a set term, please enter 'Y' for the fixed term contract flag. For example, if a customer receives an appliance when they sign up but will be penalised $200 for switching during those first 12 months, the fixed term contract flag in table 2 should be 'Y'.

If a customer chooses to switch during the term and is penalised this should be reported in table 3 in 'other fees', either as part of their final bill or a separate bill, depending on how they were billed for breaking the contract early.

6.3. Free appliances are included in the list of non-monetary incentives, but what if the appliance is not free?

If the appliance is provided at a discount (compared to Recommended Retail Price) as an incentive for customers to join or remain with a retailer for electricity services, this should be reported as an incentive. This includes any instance the terms and conditions of receiving an appliance includes a penalty for switching away within a set term.

However, this is not intended to capture hardware sold or rented to the customer as part of a non-electricity service (eg, a phone sold alongside a landline service, or a router provided with a broadband service).

6.4. How do we record gift cards?

Gift cards redeemable at other businesses which are provided to a customer as an incentive should be treated the same as non-monetary incentives. This does not include credit notes, which should be recorded in billing information.

6.5. How do we report billing data for customers on a payment plan?

Customer accounts that are on a payment plan should be flagged in table 1.

In Table 3, the amount owing at the time the bill is issued should be indicated in the 'Opening balance' as a negative value. 'Billed total' should indicate the total amount the customer is expected to pay that month, including payment plans for overdue periods, once discounts, fees and credits have been applied. The 'Electricity revenue' should only include the amount charged for electricity consumed over the payment period, not for any charged for the previous period.

6.6. What is the difference between discounts and credits (T3.12 and T3.13)?

Discounts are reductions in the usual price charged to the account with the usual price being the tariff rates as displayed on the customer's bill and reported in table 4. Discounts may be one off or ongoing (eg, customers who sign up by a certain date get a 50% discount for the first month, or customers who sign up for dual fuel receive a 5% discount).

Credits are provided to the account to offset future purchases. Credits are usually one off and may include dividend payouts, reimbursements, compensation and sign-up credit (eg, "sign up your friend and you'll both get a $50 credit").

Please ensure credit and discounts are reported in table 3, exclusive of GST.

6.7. Does a staff discount count as a discount (T3.12)?

Yes, this should be reported as a discount, (excluding discounted tariff rates reported in table 4). Mark accounts with 'N' in the currently available flag if they are receiving a discounted rate.

6.8. Should smooth-pay be reported as credit (T3.13)?

Where a customer is using a 'smooth-pay' option to pay ahead of time and reduce their bill during higher usage months, this should not be reported as a credit in (T3.13), but this should be reported in the opening balance to indicate the customer is ahead of payments.

If the retailer provides any credit as an incentive to use 'smooth-pay', the amount the retailer is contributing should be reported as credit in (T3.13).

6.9. If we have different pricing for the same plan name does this need to be identified as a discount?

No, the tariff rates as they are shown on the customer's bill are what should be reported in table 4, even if there is variation between this customer and other customers with the same plan name.

6.10. What should we report for net import/export line charges?

These are intended to capture the extent to which network charges are passed through to customer bills. If import and export line charges are included as a breakdown of charges on the bill, please provide these values. However, if these are not included, please provide an estimate based on how you charge customers.

The core idea is for retailers to report the pass through of distribution costs, so some variance from actual distribution costs (as reported in EIEP1) is to be expected.

6.11. How should we apportion fixed daily network charges between net import and net export line charges?

If the charges are the same regardless of whether or not a customer is exporting to the grid, then the charges can be fully apportioned to net import charges.

6.12. How should we report net with discounts and dividends that may come through 2–3 months after reporting?

Discounts and dividends should be reported at the time they are passed through to the customer, even if this is after the period they apply to.

6.13. What will net import/export line charges be used for?

We want to understand how retailers incorporate distribution prices into their retail offering. We're interested in retailers' logic in setting prices. In the future we expect that retailers will respond to distribution (and wholesale) prices in more varied and dynamic ways, and this will help us understand how they respond.

6.14. CORRECTION: Should rebates be reported as export revenue?

Rebates for export should be reported as export revenue at the time it is passed through to the customer.

For the avoidance of doubt, rebates for export should also be reported as net export line charges at the time the customer is rebated.

6.15. What if some fees are billed separately from the main charges?

If a separate bill is issued, please report this as a separate row in table 3. This includes electricity disconnection and reconnection fees. If the bill does not cover any consumption, please enter 0 for 'Total consumption'.

6.16. What if we bill services separately?

If services not related to electricity are billed through a separate system this does not need to be reported in table 3. Only billing related to providing electricity services needs to be reported. However, we are aware that some retailers bill for multiple services in one bill and cannot easily separate billing information, including arrears, discounts and credits.

6.17. Does this mean if we bill other services, eg, Broadband, via a different system and the charges are showing on the same invoice, we do not need to report them?

It will depend on whether you maintain separate account balances for each service. That is, if a bill shows $200 for electricity and $90 for broadband and these charges are recorded and paid as separate balances, you only need to report the $200 for electricity. However, if a single balance of $290 for the customer is recorded, you will need to report both the electricity and broadband charges.

6.18. How do we report a bill with different billing periods for each ICP?

For example, an accounts March statement:

ICP1 is billed from 31 Jan to 26 February.

ICP2 is billed 2 February to 3 March.

Broadband is billed for February.

The opening and closing balance are based on all services.

In this example, in table 3 the payment cycle start and end date should cover the whole period relating to electricity services, ie, the start date should be 31 January and the end date should be 3 March. The data for this account would be due by the end of April.

In table 4, report the payment cycle start and end date according to each ICP's start and end date. That is, in rows for ICP1 the start and end date would be 31 January and 26 February, and for ICP2 the start and end date would be 2 February and 3 March.

6.19. What if there are different billing periods for different services?

The payment cycle start and end date should relate to electricity services only, even if other services are included in the same bill.

6.20. How should we report GST for billing information?

All $ amounts should be exclusive of GST unless stated otherwise.

6.21. Should we report discounts as a positive value? And where a discount previously applied is reversed, should it be reported as a negative value?

Yes, discounts and credits should be reported as a positive value. Negative values for discounts and credits will be treated as a cost to the customer and should only be reported to indicate a reversal of a previously applied discount or credit.

6.22. **Should disconnection and reconnection fees be for all services (eg broadband) or only for electricity disconnections?**

This is intended to capture fees for electricity disconnections and reconnections. Only report disconnections for other services if the account is a bundled account.

7. Tariff rates

7.0. **How many decimal places (dps) should we report for tariff data?**

(a)   Tariff rates can use as many decimal places as required to report the tariff. Values in kWh (consumption and export) should be reported to 3dps. If more decimal places are reported, this will be rounded in our system.

7.1. **Should I report the tariff rates for gas/mobile/internet in table 4?**

No, table 4 is exclusively for reporting tariffs related to the provision of electricity services. This includes tariff rates for consumption and export of electricity, and daily charges related to the supply of electricity. Other tariff rates, like those based on peak electricity use (eg, max kW instead of kWh), may also be included.

7.2. **What tariff rates should we record as 'Currently Available' in table 2?**

Record "Y" if the retail tariff plan (including all tariff rates) is generally available as at the end of the month, and record "N" if otherwise. A "generally available retail tariff plan" is defined in the Code as follows:

generally available retail tariff plan—

 (a) means a retail tariff plan that a retailer will make available to any consumer (subject to credit requirements) if the consumer satisfies the requirements specified for the retail tariff plan relating to:

(i) physical location:

(ii) metering configuration:

(iii) price category code; but

 (b) does not include a retail tariff plan made available by a retailer only under an agreement reached as a result of the retailer directly contacting a consumer to offer a retail tariff plan that provides the consumer with a financial discount or other benefit when compared with any other of the retailer's tariff plans to which paragraph (a) applies that are available to that consumer.

7.3. **Should night and day rates be reported as time of use rates?**

Yes, any time a rate only applies to a certain time of day, such as day and night rates for a D16/N8 configuration meter, or based on half hourly metered data, it should be reported as a time of use rate.

7.4. **What do we report for column T4.11 "Time of Day" if the rate does not vary based on time of day?**

If the rate applies to the whole day (e.g. standard rates and weekend rates), report 0:00-23:59 to indicate it applies to the entire day.

7.5. **What do we report for column T4.11 "Time of Day" for night and day rates, or other time variable rates set by distributors?**

If you know the times that the night and day rates apply to, please report those times, even if set by the distributor. However, if you are not sure on the exact times the distributor uses for night and day rates,

this can be left blank.

7.6. Our prices change on April 1. Do we need to list both the old and new prices in table 4?

Yes, if a pricing change occurs midway through a payment cycle, you will need to enter two rows for each impacted tariff rate in table 4. If, for example, the billing period was for 15 March to 14 April, with a price change occurring on 1 April, you would need one row with the dates 15 March to 31 March, and a second row with the dates 1 April to 14 April.

7.7. If an ICP has two meter registers on the same price (and all other details are the same) can this be reported as a single row?

Yes, if both meter registers receive the same price, the corresponding variable rate and aggregated consumption can be reported as a single row, given all other details are the same.

If each meter register has a different price or details (eg, one is load controlled and the other is uncontrolled) then report the variable rate and consumption for each register as a separate row.

8. Half Hourly Data

8.0. How many decimal places (dps) should we report for half hourly data?

Half hourly data should be reported as numeric. For kWh values (consumption and export) this should be reported to 3dps. If more decimal places are reported than required, this will be rounded in our system.

8.1. Should half hourly metering data be reported for the reporting month, eg, April data, due end of May 2025, be reported for each ICP from 1 April to 30 April?

Yes, provide half hourly data for the reporting month from the first to last day of the month.

If you do not have the full month for some ICPs (the meter stopped communicating, or they were not your customer for the entire month), then provide for the days you do have data (ie, from move in date to move out date).

8.2. What level of validation is required for half hourly metering data?

Please provide half hourly data post any current data validation or data cleaning carried out for the purposes of billing and providing accurate information to customers. At this stage, we do not require further data cleaning/validation.

8.3. If there is no data for a particular half hour (e.g. most days do not have TP 49 and 50) should this be left blank, or zero?

If there is no data for a particular half hour, please leave this blank, zero will be interpreted as no consumption.

9. Disconnections

9.0. Which disconnections should be recorded in table 6?

Both manual and remote electricity disconnections should be recorded where a domestic or small business consumer is associated with the ICP and where the reason for disconnection is non-payment of account by that consumer, or where a consumer on a prepay account is disconnected due to insufficient credit.

This table should not include any disconnections of any premise where there is no consumer registered at the address at the time of disconnection, the disconnection is unrelated to non-payment or insufficient credit, or the disconnection is due to theft or fraud.

9.1. Which reconnections should be recorded in table 6?

Electricity reconnections should be recorded where the reconnection is following a disconnection for non-payment and the customer concerned has been reconnected for a reason such as a payment was made to their account (including prepay credit), they notified the retailer that a medically dependent consumer was residing at the address, or another resolution to non-payment was agreed to (such as a payment plan).

Do not record reconnections where a consumer has changed retailers, or where a new consumer has moved into a premise.

9.2. What date and time should we record for disconnections and reconnections?

If available, retailers are to provide the date and time when the retailer "actioned" the disconnection (or reconnection), whether this was a manual disconnection by a technician, or a remote disconnection via AMI.

If this exact time is not recorded, but another time close to this time is recorded, supply the time you have recorded.

Time is not a required field, however, we encourage retailers to start recording disconnection and reconnection times.

9.3. Please be aware that retailers have obligations under clause 37, Part 11A, of the Electricity Industry Participation Code to notify the Electricity Authority as soon as it becomes aware of an electrical disconnection resulting in a premises which the retailer knows a medically dependent consumer may be permanently or temporarily residing without electricity.

10. Load control/demand management

10.0. What if the customer has a third-party managing demand but we do not know?

We do not expect retailers to always know when a third party is managing demand, however, we have left it as an option for cases where a retailer is aware a third party has a contract with this ICP. If the retailer is unaware of any demand management (by retailer, distributor or third party) then answer 'N' in table 2.

10.1. What if a customer has uninstalled hot water heating?

The information requested on load control and demand management in table 2 is used to understand who has the contractual right to manage demand. If the customer uninstalls hot water, but the contractual right remains, please enter according to the contractual right.

11. Flexibility services

11.0. Do we report load control by the distributor in table 7?

No, table 7 only covers flexibility services acquired by the retailer. Only report load control agreements where the retailer intends to use it directly. This table is for retailers' intentions for using flexibility services. If you are not currently contracting flexibility services (either direct or indirect) you do not need to submit table 7.

11.1. What do we report for the purpose of flexibility services? What if we never used it for a given purpose?

The purpose should reflect the retailer's intentions at the time of entering the agreement(s). Enter all letters that apply and whether flexibility services were used for that purpose that month. For example, if the agreement was intended to avoid congestion and manage outages, enter 'CM', even if those services were not needed that month.

11.2. How do we report total capacity of flexibility services if we do not know the capacity?

Total capacity should be the maximum amount of capacity that could be available. If a capacity figure has been agreed upon, please use the total capacity of the agreement. If you do not know the actual maximum, eg, for residential load, estimates are sufficient. Provide the total capacity across all agreements and ICPs reported in the given row.

11.3. How do we report the actual amount used if we are not sure what the total load reduction was?

Please report according to the amount of load control, or demand management, you intended to use. Eg, if you asked a large load user to reduce by 50MW, report 50MW. If you intended to turn off around 100MW of residential load, report 100MW.

11.4. What is the difference between a direct and an indirect agreement?

A direct agreement is made with the customer account holder, such as the terms of service with a residential customer, or an agreement with an industrial customer. An indirect agreement is with anyone other than the customer who has the contractual right to control the load for the customer. This could include an agreement with an aggregator or an agreement with a distributor.

11.5. Regarding flexibility services, if we have an agreement with lines companies that both of us and the distributors have the right to manage the controlled circuits, will that be considered a flexibility agreement?

Table 7 is not intended to capture this type of agreement between the retailer and distributor, though we are interested in any related agreements between the retailer and the end user or customer.

However, where an agreement exists to allow both the distributor and retailer to control a circuit, this should be indicated for the impacted ICPs in T2.10 'Demand Side Management' with the characters 'DR' (ie, indicating both the distributor and the retailer have the right to manage demand)

12. Debt and arrears

12.0. What is the scope for debt and agency referrals for multi-service retailers? Should this include all arrears, or arrears only associated with electricity services?

This data should only include debt write off and agency referrals related to accounts which you have (or had) a contract for the supply or distribution of electricity.

Accounts related to services other than the supply and distribution of electricity fall out of the scope of the notice. However, in cases where customers receive multiple services, we understand that it is not practical to split out payments and arrears which are only associated with electricity services from the total.

12.1. How should we define a debt collection agency?

A debt collection agency for the purposes of this notice is: a company to whom a retailer has passed on, or sold, debt after exhausting the usual steps in line with retailers' obligations under the Code of engaging with a customer to resolve unpaid invoices.

13. Complaints

13.0. How should we define a complaint?

A complaint is an issue raised by a customer that has proceeded to an internal dispute resolution process with the contracting retailer.

13.1. For total number of complaints, should we only count the electricity related complaints? Do we need to consider the bundle products complaints (which includes electricity)?

Please include complaints if they are related to electricity. For bundled accounts, complaints related to payment should be included, but a complaint related solely to another product (eg, a complaint about internet speeds) should not be included.

14. Medically dependent consumers

14.0. How should we define a medically dependent consumer?

Medically dependent consumers are defined as residential consumers who depend on mains electricity for critical medical support, such that loss of electricity supply may result in loss of life or serious harm. This includes residential consumers who depend on medical or other electrical equipment to support a medical treatment regime (which may include use of a microwave to heat fluids for renal dialysis or similar use of electrical equipment). See the Authority's Retailer Guidance for more information on this definition.

Please include all medically dependent consumers, whether or not their status has been verified (unless the question specifies otherwise).

14.1. What is the difference between question 6a and 6b, on applications for medically dependent consumers?

Question 6a is specifically asking for the number of applications which the retailer has requested from consumers, whether or not they have been received.

Question 6b is asking for the total number of applications (in any form) received from consumers, whether or not they were requested.

14.2. We review medically dependent consumer status in a particular month. How do we answer question 7?
If you have not reviewed any medically dependent consumer's status in a given reporting month then respond '0' to both 7a and 7b. Provide the data in the reporting month(s) during which you complete the MDC review process.

15. Extensions

15.0. How do we apply for an extension of time?

Extensions of time will only be granted in exceptional circumstances and are not intended to be enduring. The Authority's exemption process will be more appropriate for enduring issues. You will need to provide a detailed explanation of why the extension is required. The application form can be found on the project page Improving retail market monitoring | Our projects | Electricity Authority.

15.1. Is there a deadline for requesting extensions of time?

Applications for extensions of time should be submitted well in advance of the due date of the first report so the Authority has time to fully consider your circumstances and request any additional information. We recommend making an application by 30 June 2025.

15.2. Early engagement

We are available to discuss a proposed request before it is submitted. We also encourage retailers to utilise the retaildata@ea.govt.nz email and our information sessions. In considering an extension request the Authority will consider what alternative solutions have been considered and a Participant's work towards achieving compliance.

15.3. How much time is left to make a request for an extension?

As mentioned above, we strongly recommend engaging with the Authority as soon as possible if you consider you may seek an extension of time. The last date to submit an extension request is 22 August 2025, but extensions will only be granted in exceptional circumstances and compliance with the clause 2.16 notice is required under the Electricity Industry Participation Code 2010.