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Submission on Evolving Multiple Trading Relationships and Switching – Supplementary Consultation Paper

Introduction

1. Bluecurrent welcomes the Electricity Authority's (the Authority) supplementary consultation paper on *Evolving multiple trading relationships and switching*, dated 27 January 2026.
2. We acknowledge the work of the Switch and Data and Formats Group (SDFG) which informed the supplementary consultation paper and the Authority's ongoing development of a framework for multiple trading relationships (MTR).
3. Bluecurrent broadly agrees with the Authority's revised approach to introducing MTR, which is more streamlined than its 2025 proposal, opt-in rather than mandatory, and evolutionary rather than disruptive – following feedback from stakeholders. This would help ensure that any new arrangements to introduce MTR and their impacts are well understood by stakeholders, especially by potential early adopters, and expected consumer benefits can be unlocked in a cost-effective manner.
4. In this supplementary submission, we make suggestions for the Authority to consider as it develops an MTR framework, in conjunction with industry participants, the SDFG, and consumers. We believe these suggestions would help achieve a shared understanding of MTR and its implications across the electricity sector, including how a cost-effective MTR can potentially enhance consumer mobility.

Role of metering service providers

5. Bluecurrent welcomes the Authority's proposal to adopt a simpler and more cost-effective approach to introducing MTR, following stakeholder feedback. The revised stage 1 MTR model involves:

> . . .a standalone process in the electricity registry…for MTR-adopting ICPs. Essentially this process would assign consumption and generation traders only to flagged MTR ICPs. This revised approach would still involve some changes to the registry and participants' IT systems. However, it is simpler and lower cost and limits the changes required for participants not involved in MTRs.[1]
>
> . . .the Authority would develop new standalone provisions in the registry alongside processes for MTR-adopting ICPs, with no material changes to single trader ICPs in the registry. This approach would assign consumption and generation traders only to ICPs that choose separate retailers for consumption and generation and provide the appropriate records of events.[2]
>
> This revised approach would involve greater implementation changes to the registry but would minimise changes to participants' systems and administrative practices to manage two traders at one ICP.[3]

[1] Supplementary consultation paper, page 1
[2] *Ibid.*, page 5
[3] *Ibid.*

6. We welcome this more targeted approach, which would:

> . . .avoid the need for all traders, metering providers, and distributors to implement comprehensive system changes.[4]
>
> . . .The original proposal to enable MTRs involved assigning a trader to each different meter channel for each ICP record in the registry. This proposal would have required all retailers to make significant system upgrades, whether they wished to participate with MTRs or not.[5]

7. Importantly, the proposed streamlined approach would make the design and implementation of stage 1 MTR more cost-effective and flexible for the implementing industry participants:

> . . .This revised proposal would significantly lower the anticipated implementation costs for existing participants, as it would require minimal change for the significant majority of existing ICP trading activity.[6]
>
> The revised proposal would afford participants flexibility as to how their systems and process evolve to meet consumer demand. This would mean that participants could implement manual or subsidiary systems in the near-term and undertake any more significant systems upgrade when the volume of MTR ICPs reaches a critical mass.[7]
>
> . . .About 3 percent of households currently have some form of distributed generation meaning that participants would not need to change processes for around 97% of households. . .We expect the number of customers who would choose a different generation trader to grow over time.[8]

8. The Authority's revised approach assigns the 'heavy lifting' to be done mostly in the electricity registry, at this stage. Nevertheless, it should be noted that any changes to how load is recorded – regardless of the magnitude – will likely affect the implementing parties' IT systems and operational processes.

9. We therefore suggest that the Authority provide greater clarity around the respective roles of the implementing parties, including metering service providers, to further shed light on the practical implications of new/initial MTR arrangements on their IT systems. The Authority could provide more detailed information on the responsible market participant(s) for each step of the process, where in the registry the new processes will sit, the file formats that will be used, the nomination of metering service providers by MTR traders, etc.

10. While the revised approach may no longer require comprehensive updates to the relevant market participants' IT systems – at this stage – any changes related to the proposed revisions will still require investment, as the Authority itself acknowledges.[9]

Use cases

11. As indicated in Bluecurrent's submission (dated 29 July 2025) on the Authority's previous consultation on MTR (June-July 2025), we support an evidence-based approach to MTR development. This would help ensure that any proposed MTR framework delivers meaningful consumer benefits whilst maintaining New Zealand's reputation for effective market design and consumer protection.

12. We therefore welcome the independent cost-benefit analysis (by Sapere) commissioned by the Authority for MTR and switching. Sapere confirms that the benefits of the revised stage 1 MTR proposal are likely to outweigh the costs.[10] The net economic benefits would be derived from an increased uptake of solar and battery systems (which would help reduce peak consumption) and more efficient switching processes.[11]

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[4] Supplementary consultation paper, page 1
[5] *Ibid.*, page 5
[6] *Ibid.*, page 6
[7] *Ibid.*
[8] *Ibid.*
[9] *Ibid.*, page 8
[10] *Ibid.*, page 9
[11] *Ibid.*

13. In our view, Sapere's finding generally confirms the importance for MTR to be designed and implemented cost-effectively so that material benefits can be delivered even at the early/foundational stages. We further note Sapere's finding that some benefits may not be readily quantifiable but are still attributable to the introduction of the revised MTR proposal.[12] This could be due to other factors including technology and commercial developments, more efficient switching processes, and the dynamic efficiency gains ensuing from greater market competition and innovation.[13]
14. To achieve a shared understanding of MTR and its potential benefits across the sector, we suggest that the Authority, as part of its future updates on MTR, include use cases from 'end consumer persona' perspectives. These could include, for example, cases involving an EV owner, a solar PV owner considering investing in battery, a consumer contemplating to invest in DER for the first time, or a passive consumer with no interest in actively participating in the market, etc. The end objective of MTR after all, is to enhance consumer mobility that would enable consumers of all types to compare and switch providers with ease, choose different providers for different services when it benefits them, and use and produce electricity in ways that meet their unique needs cost-effectively.

Timeframes

15. We suggest that the Authority provide indicative timeframes for the development and implementation of the various steps of the revised approach to introducing MTR outlined on page 6 of the supplementary consultation paper. More detailed description of those steps and indicative timeframes would enable stakeholders to provide feedback on the extent of the required changes to their IT systems, assess the reasonability of proposed timeframes, and suggest more realistic timeframes, as necessary.
16. We also suggest that the Authority provide sufficient timeframes for future MTR consultations, given MTR requires actions by multiple parties already facing multiple reforms, and consequential changes across the *Electricity Industry Participation Code*. In practical terms, we consider a consultation period of four to six weeks to be reasonable for MTR-related proposals.

Initial implementation

17. The Authority could consider implementing any streamlined stage 1 MTR in a 'test bed' or on a small scale in a sandbox-type environment. This would allow any teething issues to be identified and resolved before new arrangements that would lay the ground for MTR are widely deployed.

Concluding comments

18. We would welcome the opportunity to contribute our expertise to any ongoing work to support MTR development, drawing on our experience in the New Zealand and Australian electricity markets.
19. This submission does not contain confidential information, and we are happy for the Authority to publish it in its entirety.

Yours sincerely

Matt Bostwick
Chief Customer Officer NZ

[12] Supplementary consultation paper, page 7
[13] *Ibid.*, pages 7 – 8 and page 10