Appendix B Submission form

Evolving multiple trading relationships and switching – supplementary consultation

Please email your submission to policyconsult@ea.govt.nz by 5pm, Tuesday 17 February 2026.

Name	
Organisation	

Questions	Comments
Q1. Do you have any comments on our revised proposal for MTRs?	**Introduction** I am submitting in an individual capacity as someone actively engaged in the practical development of distributed energy storage and flexibility models in New Zealand. I support the Electricity Authority's objective of evolving market arrangements to better accommodate distributed energy resources (DER), including storage and flexible demand. In my view, the revised Multiple Trading Relationships (MTR) proposal represents a constructive step forward compared with earlier approaches, particularly through its optional and staged design. My comments focus on ensuring that the framework enables innovation without unintentionally embedding cost distortions or technology bias. **Support for Direction of Travel** I support: • The introduction of MTR as an **optional** framework rather than a mandatory redesign of all ICP arrangements. • The use of **flagged ICPs** as a pragmatic mechanism to signal more complex consumption and export behaviour without imposing system-wide change. • A staged approach that allows learning and refinement before wider adoption. These features materially reduce implementation risk while preserving future flexibility. **Importantly, the optional nature of MTR arrangements ensures that consumer protections and existing retail obligations are preserved for the majority of households, regardless of whether they choose to participate in more complex arrangements.** The Authority's emphasis on optional and staged implementation appropriately recognises that MTR is a general-purpose market arrangement, and that early participation should not require bespoke system changes or disproportionate cost allocation to individual participants.

	Role Classification and Participation Participation in MTR arrangements should not, by default, imply automatic reclassification of a participant as a retailer or generator. In particular, it is important to maintain a clear demarcation between: • the **consumption-facing entity**, which remains responsible for residential supply obligations, consumer protections, and care arrangements; and any **generation or flexibility-providing entity**, which may operate under separate commercial and contractual arrangements. • Not all distributed generation or storage configurations warrant the same regulatory treatment. For example: • Where generation or storage assets are primarily used for **self-supply optimisation** by a consumer, existing arrangements are often sufficient and additional MTR complexity may add little value. • Where assets are actively coordinated to provide **system, market, or flexibility services** beyond self-consumption, MTR can provide an appropriate mechanism to clarify roles, responsibilities, and settlement. The MTR framework should therefore operate as a **demarcation tool**, applied where it adds clarity and accountability, rather than as a default state triggered by the mere presence of export capability. This approach supports innovation while preserving consumer protections, avoiding unnecessary registry and compliance complexity, and preventing inappropriate role expansion that could deter participation or disadvantage consumers.
Q2. Is there further information you can provide that may improve the evidence base for our assessment of (a) costs and/or (b) benefits?	**Network Charging Principles** A core principle that should underpin MTR-related arrangements is **cost reflectivity**. In particular: • **Network charges should apply once per unit of energy**, not multiple times due to role semantics that are inherent with distributed storage assets. • MTR arrangements should avoid creating circumstances where the same unit of energy attracts network charges at both the point of charging and again at the point of subsequent export or delivery. Failure to address this risks discouraging storage-led flexibility, and embedding inefficient outcomes. More broadly, applying network charges at the **first point of consumption** provides the fairest and most cost-reflective basis for recovery, and avoids later re-imposition of charges that do not correspond to additional network service. **Avoidance of Double Recovery** Exports associated with flagged-ICP arrangements should be designed to **avoid double recovery of DUOS and TUOS**. This is particularly important where storage is used to shift energy temporally rather than to introduce additional net load on the network. Market arrangements should distinguish between genuine incremental network use and accounting artefacts arising from role classification. **Technology Neutrality and Multiple Capacity Types** The MTR framework should explicitly recognise that future system flexibility will be delivered through **multiple forms of generation and supply capacity**, including: • Fixed photovoltaic generation

	• Distributed battery storage • Sporadic or aggregated electric vehicle assets No single technology class should be implicitly privileged through market or settlement design. Flexibility frameworks should remain neutral to the physical source of capability. **Access to Third-Party Flexibility Assets** Retailers and new market entrants should be able to have **direct access to third-party distributed storage and flexibility assets**, under clear commercial and settlement arrangements. Such access should not require vertical integration or reliance solely on wholesale-market mechanisms. **Combined with MTR-enabled arrangements, direct access to third-party distributed storage and flexibility assets has the potential to support participation models that do not require individual asset ownership**, including through retailers, housing providers, or other intermediaries. Enabling contractual and off-market access to flexibility assets is likely to improve competition, innovation, and consumer outcomes. **Billing and Settlement Flexibility** Billing and settlement systems must retain sufficient flexibility to support innovative multi-party arrangements, and should be implemented in a manner that avoids the creation of bespoke processes or participant-specific cost burdens where arrangements are operating within standard market frameworks. Overly rigid settlement constructs risk constraining otherwise efficient models and slowing the adoption of storage-enabled flexibility.
Q3. Do you agree the benefits of the proposed Code amendments are likely to outweigh the costs? If not, please explain why not.	**Closing Comment** Overall, I support the revised MTR proposal as a positive step toward a more flexible and future-ready electricity system. The key challenge will be ensuring that the framework enables storage and flexibility to participate without unintended cost duplication or structural bias. I encourage the Authority to continue engaging with innovators and practitioners as these arrangements are refined. **Care should be taken to ensure that MTR frameworks do not implicitly favour capital-rich households, and remain compatible with shared, intermediary-led, or community-scale arrangements that can extend benefits to a wider range of consumers over time.** Overall, I consider the benefits of the revised MTR proposal to outweigh the likely costs, provided the framework continues to emphasise optional participation, cost-reflective charging, and proportionate implementation.