17 February 2026

Electricity Authority

Level 7, AON Centre,

1 Willis Street,

Wellington 6011

Dear Policy team,

Intellihub Submission on the Evolving Multiple Retailing and Switching Consultation – Supplementary Consultation

Intellihub Group ("Intellihub") welcomes the opportunity to provide its views on the Evolving Multiple Retailing and Switching Consultation – Supplementary Consultation ("Consultation Paper").

Intellihub agrees that implementing MTR would enable consumers to purchase their energy from one retailer while selling their generation to another. This will provide consumers with a new choice that was not available to them in the past. However, the proportion of consumers that stand to benefit from MTR is small, and there may be limited scope for competition or pricing to be improved by MTR. In addition, the recent introduction of time varying pricing for buyback rates may further reduce the scope of potential benefits to consumers.

While we welcome the Authority's decision to look for lower cost options for the implementation of MTR, we do not consider that proposed approach in its current form reduces the cost or complexity of work required by an MEP. We believe that the proposal would benefit from further simplification, with a view to better aligning costs for MEPs and other market participants with the potential benefits arising from MTR. To this end, a strawman for a simplified alternative implementation of MTR is set out in our response in appendix B.

Please do not hesitate to contact me if Intellihub can provide further assistance.

Yours sincerely

Daniel Pinny

GM Customer Data & Analytics

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	Daniel Pinny
Organisation	Intellihub

Questions	Comments
Q1. Do you have any comments on our revised proposal for MTRs?	Intellihub considers that the revised proposal will have material impacts on market participants even if they chose not to participate, and that the proposal would benefit from further simplification. Our view is that the benefits delivered by the Authority's revised proposal could be achieved at a lower cost to the industry, and consumers indirectly, by adopting a simplified solution. An alternative for consideration is set out below: - As with the recent DER change, add a flag to the registry to enable a participant to opt in / out of seeing MTR details such as the new records and events outlined below. - Introduce a new record type into the registry which mirrors the existing trader record but for MTR. We've called it the "X-TRADER" record. The presence of a valid X-TRADER record (start date is historic, no end date or end date is in the future) indicates it is an MTR site. HDR,RSEVENTDTL,RGST,RETA,01/03/2012,18 DET,1234567890AB123,ADDRESS,ADD-9876 DET,1234567890AB123,METERSUMMARY,M DET,1234567890AB123,METERINSTALL,MET- DET,1234567890AB123,METERCOMP,MET-1 DET,1234567890AB123,METERCHANNEL,ME DET,1234567890AB123,NETWORK,NET-222, DET,1234567890AB123,PRICING,PRI-456,25/ DET,1234567890AB123,STATUS,STA-444,12/ DET,1234567890AB123,TRADER,REC-333,12/ **DET,1234567890AB123,X-TRADER,REC-555,** - The export trader would be treated by the MEP as a data agent and the scope of services would be limited to sending the required data. The export trader would need to liaise with the trader of record for any configuration or metering changes, and the trader of record would agree and communicate those changes to the MEP. The existing trader of record would remain and retain all existing rights and control but be required to receive and undertake any reasonable requests from the export trader.

	- A consumer opting into an MTR relationship would do so via the export trader which would start an X-TRADER switch. In this situation there would be no incumbent X-TRADER, indicating an MTR situation is being initiated. - A consumer opting out of an MTR relationship would do so either via the export trader or the trader of record which would initiate an X-TRADER switch. In this situation there would be no incoming so it's a switch from someone to no-one and terminating an MTR situation. - A consumer switching between export traders would be handled the same as per existing switch processes but apply to the X-TRADER record only. - No changes would be made to the Metering areas of the Registry. Channels would not be assigned to individual participants. The MEP would use the TRADER and X-TRADER records to determine who the participants are that will receive the appropriate records from all metering installations on any given site. The current proposal where the Registry assigns channel ownership would add additional steps to the process of making metering changes (the bulk of market update activity) where the MEP would make the change based on retailer request, have to submit that update to the Registry as per current requirements, but then wait for the Registry to assign the trader ownerships to each channel, receive those back and process them into our systems before we could deliver that data. That additional processing time will increase the time to complete service orders and delay the delivery of data to participants. - In the event of an MTR on boarding or off boarding the MEP would simply change the ownership of the appropriate channels and trader of record and export trader would start or stop seeing the channels of data as expected. This would mirror the situation where a site was upgraded to have generation, or had generation removed and the associated metering configurations changes that happen during those events.
Q2. Is there further information you can provide that may improve the evidence base for our assessment of (a) costs and/or (b) benefits?	This revised proposal put forward by the Authority doesn't reduce the changes that would be required for Intellihub to accommodate MTR. On this basis the costs and timeline would not reduce either. On the contrary, if the Authority set a shorter implementation timeframe the proposed in our initial consultation response it's likely this would significantly increase costs due to the need to prioritise this change without efficiently sequencing it into our broader change programme. The potential benefits to consumers arising through MTR remain unclear. While the Sapere report does indicate that additional battery capacity could offset future industry costs, it does not suggest that the implementation of MTR will make it materially more attractive for a consumer to purchase a battery. Therefore, there is no reason to think that MTR will directly result in more batteries being deployed than would otherwise occur. On that basis it doesn't follow that

	increased battery capacity can be factored into the payback for implementation of MTR. Further simplification would help to bring costs into closer alignment with benefits. The alternative approach we detailed in Q1 would see our costs reduce for MTR. It should also enable most participants to avoid extensive changes to their systems unless they are planning to participate in MTR.
Q3. Do you agree the benefits of the proposed Code amendments are likely to outweigh the costs? If not, please explain why not.	Intellihub agrees that the Authority's preferred approach to MTR would enable consumers to purchase their energy from one retailer while selling their generation to another. This will provide a small number of consumers with a new choice that was not available to them in the past. However, as MTR would only be available to consumers with solar or battery solutions in the current stage of implementation, the benefits would only be available to less than 5% of consumers. If the uptake rate from this group is 20% then less than 1% of consumers would potentially be experiencing improved outcomes for change that increases costs for all market participants. It therefore does not follow that MTR will deliver materially improved competition, or energy pricing, for most energy consumers. Further, the recently announced requirement for retailers and distributors to provide time driven pricing plans to reward consumer who provide energy at peak times is positive for consumers. But any price upside delivered by this change may mean that the there is less potential price upside for consumers arising through MTR. In addition, the proposal does not seem to consider that the rate a consumer pays for consumption under their current price plan may increase if any cross subsidy created by their excess generation is no longer available once this transitioned to an alternative retailer. Given these commercial realities, it may not be financially beneficial for a consumer to sell their excess generation to an alternative party. It also seems unlikely that a participant would enter the market solely in the MTR space willing to pay a higher rate for excess generation above what existing participants would already effectively be recompensing consumers. This does not preclude some new form of product or variation on existing market structure or hedging based around MTR, but it seems unlikely to be viable given the small volumes being discussed, the commercial realities, and the complexity that would be required to manage that sort of product. Lastly, and as outlined in Q2, there is also no evidence to suggest that MTR will increase consumer uptake of batteries in the future, and so it doesn't follow that increased battery capacity can be factored into the benefits side of any cost benefit analysis for MTR.