

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	Gareth Williams
Organisation	SEANZ

Questions	Comments
Q1. Do you have any comments on our revised proposal for MTRs?	<p>SEANZ supports the revised proposal. Simplifying the scope of the initial implantation of MKR makes sense. Establishing the core of the solution using the registry to minimise development work by individual retailers is logical. We urge having the required changes made to the registry as soon as possible to enable MTR to be implemented quickly.</p> <p>SEANZ views this as a good foundation, and establishes the right direction for giving customers options as to how they sell their excess generation.</p> <p>We see an early iteration of MTR is to allow customers to sell their excess generation directly to another customer (or multiple customers), without needing a retailer to act as an intermediary. (Achieved through a match between metered import and export volumes and a corresponding adjustment to volumes being billed by retailers). This is important for supporting community solar / battery developments, providing a solar energy option to customers unable to host panels / batteries on their property. It provides another means to drive increased competition on energy price.</p>
Q2. Is there further information you can provide that may improve the evidence base for our assessment of (a) costs and/or (b) benefits?	<p>Nothing to add. The analysis seems reasonable (and conservative in terms of assumptions)</p>
Q3. Do you agree the benefits of the proposed Code amendments are likely to outweigh the costs? If not, please explain why not.	<p>Given the low % increase (due to MTR) in uptake of solar / battery storage required, it would seem unlikely that the benefits will not outweigh the costs.</p> <p>Providing opportunity for owners of solar and battery to optimise the value of their exported energy would be expected to have a reasonably significant impact on customers decisions to invest. In addition, any initiative which increases retail competition will intuitively lower costs to all customers.</p>

