

29 July 2025



Electricity Authority

To: policyconsult@ea.govt.nz

Re: Consultation Paper – Evolving Multiple Retailing and Switching

Utilities Disputes Limited | Tautohetohe Whaipainga (UDL) welcomes the opportunity to comment on the paper *Evolving Multiple Retailing and Switching (Evolving Retailing Paper)*.

UDL operates the mandated Energy Complaints Scheme (ECS).¹ UDL is a not-for-profit company and there is no charge for a consumer to make a complaint. The core purpose of the ECS is to ensure that any person who has a complaint about a retailer or distributor has access to an independent process for resolving it.² The ECS in the 2024-2025 reporting year received 7533 complaints and 11499 queries. Complaints in the past four years have risen nearly fourfold.

The EA's proposal seeks to allow multiple trading relationships (MTRs)³ centred on a single ICP with multiple channels. UDL's core submissions are:

- A. UDL supports the introduction of MTRs and notes the proposal is motivated by new technologies, and their promise of providing for the consumer lower costs, improved services and a more reliable supply. However, before implementation many consumer issues as discussed below will require clarification and resolution.
- B. The review of MTRs technical requirements should occur concurrently with an analysis of the consumer guard rails needed for the project's implementation. Delaying the consumer analysis will limit the effectiveness of MTRs.
- C. It is important there is a clearly identifiable and single industry contact point for the consumer throughout the switching process and post switch, whether that be a retailer, a Distributed Energy Resource (DER)⁴ retailer, distributor or generator.
- D. It is likely the introduction of MTRs will require changes to the Consumer Care Obligations (CCOs), industry legislation, and practice. This appears necessary to ensure

¹ See Electricity Industry Act 2010 (EIA), s 95. UDL, in addition to the ECS, operates an independent telecommunication scheme,¹ voluntary water dispute resolution schemes, and the mandated Broadband Shared Property Access Disputes Scheme which considers complaints about the laying of fibre in shared driveways. UDL also has an educative function, both in promoting its resolution schemes, being the first point of contact for consumers, and providing systemic insights to the various industries.

² See Ibid. sch 4, clause 1.

³ Singular MTR.

⁴ Plural DERs.

there is clarity about issues such as: disconnections, responsibility for the quality of supply, and that retailers, distributors, and generators have the necessary communication channels to respond to urgent consumer issues.

- E. The EA may wish to assess what can be learnt from the Australian approach to MDCs, it has taken a tempered approach to the single meter model.
- F. The introduction of MTRs highlights again the importance of the EA amending the information required on bills. UDL recommends that bills include information such as the name of the consumer's plan, the term of the plan, if a read is actual or estimated, a brief explanation of the rates charged, and that credits are clearly itemised and explained rather than included within other figures (e.g. a running total).
- G. It is not in the consumer's interest to receive multiple bills and credits for the same ICP and it would be a backward step if a consumer is required to pay a third-party service to act as a billing aggregator to understand their electricity consumption and exportation. Therefore, further reflection is needed as to how to simplify the MTR billing and credit process.
- H. If billing aggregators are included in the MTR model, they should be included in the definition of a retailer participant as their actions may have negative consequences on a consumer. This will require changes to the Electricity Industry Act 2010 (EIA). This development would be in line with the intention of the Consumer and Product Data Act 2025 which allows for accredited requestors to become members of consumer complaint schemes like the ECS.⁵
- I. MTRs may also introduce a new actor to the industry, a flexibility aggregator. This body would not be retailing and exporting electricity but manage the load of a consumer and reduce strain on the network. Such bodies would have a relationship with consumers in terms of consumption management and time of use. Currently this type of business is not required to be a member of ECS, unless the definition of a retailer in the EIA was expanded. In our view the consumer facing role and control over consumption by an aggregator makes it appropriate for them to be required to join the ECS so consumers can have access to redress if issues arise.
- J. To ensure the consumer is not double billed for services within an MTR an audit process of the apportionment of costs appears to be required. However, as well as regulatory controls, it is recommended the EA seek out opportunities to educate and onboard new DER industry participants. A reformed EA registry process might be an opportunity for such education and dialogue. It might also be an opportunity to mandate at the same time dual registration with the ECS.
- K. Current industry participants who have a role within MTRs may also fall outside of the current consumer redress provided by the ECS. Generators are not members of the ECS, which is appropriate given their distance from the consumer and intervening roles of the distributor and retailer. However, with the advent of DERs, a DER generator's equipment

⁵ See Customer and Product Data Act 2025, s 49.

is on the consumer's property. This is likely to lead to consumer complaints around installation, removal, and impact on the premises. If the DER generator is not retailing, or distributing they would likely fall outside the ECS. Moreover, if a retailer is only exporting electricity from a consumer and is not retailing, they too would appear to be acting in the place of the DER generator only and may fall outside the ECS.

- L. Indeed, an aspect of DERs and their use is that they expand or redefine the traditional understandings of distributor, generator, and retailer or even customer networks. Therefore, a review of all these terms within the EIA appears required. In such a review the EA may be assisted by the work of the Australian Energy Regulator (AER) which has been looking at how DER products and services may be included within its regulatory scheme. It has suggested that an energy service may be defined as a body that:
- *sells electricity to a consumer's premises*
 - *unless exempted, on-sells or exports energy from an embedded network or manages the flow of electricity to and from an embedded network*
 - *exports electricity from a consumer's premises*
 - *controls, constrains, prevents or otherwise has a substantial impact on the flow of electricity to and from a consumer's premises.*⁶
- M. The role of Metering Equipment Providers (MEPs) will also require clarification as any confusion could impact the consumer. Retailers often take responsibility for the actions of an MEP, however with MTRs the issue becomes which retailer and when. With the introduction of MTRs, there is also the prospect of an MEP mistakenly removing services that belong to another retailer and affecting the consumer. It may then be more practical for the consumer that MEPs are required to become members of the ECS.
- N. Metering fees will also require clarification. A possible solution is that the consumption retailer should be responsible for the lease fee of the meter, and the MTR retailers pay for additional costs, such as a separate measurement channel for an electric charger. To lower fees for the consumer UDL invites the EA to consider requiring smart meters to be configured two ways at set up. This will reduce any subsequent reconfiguration fees, it is also recommended all retailers use more accurate half hourly reads in their settlement and invoicing.
- O. MTRs are by nature complex, yet their success will rest on simplifying their day-to-day management and keeping a downward pressure on costs.

⁶ See AER, *Review of Consumer Protections for Future Energy Services*, Nov 2023, 26. UDL thinks limb 4 may benefit from the addition of the word "increasing".

Evolving Retailing and Complaints

The *Evolving Retailing Paper* is an attempt to grapple with changing profile of electricity distribution and retailing.

Historically, electricity flows have been mainly one-directional where the customer imports or consumes electricity. However, consumers, with the increase in DERs (e.g. solar, wind, and battery resources) are increasingly exporters of electricity. With this increase in DERs the network is becoming truly bi-directional, where there are large import and export flows of electricity.⁷ This creates opportunities for consumers to off-set their electricity costs through export credits.

Smart meters which make up 93% of the consumer market,⁸ will help the consumer take advantage of the network's bi-directional flows, as they will allow consumers to have multiple relationships with retailers, distributors, and/or generators. In time, smart meters may allow the consumer to self-create a tailored plan made up of the offerings of various retailers to match their consumption profile.

Evolving Retailing - Statistical Snapshot

In this new DER environment, there are creative opportunities. Modern regulation includes an educative component. Therefore it is recommended the EA look for opportunities to establish relationships with new DER industry participants, inclusive of introducing them to industry regulations and practice, such as the CCOs.⁹ A transformed EA registration process may be a place where such dialogue can occur.¹⁰ The registration process could also include prompts for participants registering as retailers, generators, distributors or line owners to register with ECS. This recommendation takes on more urgency as the EA considers allowing DER generators to export electricity through a shared ICP, thus further integrating generators into the network, but introducing a new participant type that contracts with customers.

The statutory function of the ECS is to consider consumer complaints. Services based on DERs solve many consumer issues, but no product works perfectly.¹¹ To round out the *Evolving Retailing Paper* see below a snapshot of complaints connected to switching and services that have a DER component.

⁷ See EA, *Addressing Larger Voltage Deviations and the Network Performance Issues in New Zealand Power System*, 25 June 2024, pgs 3, 27

⁸ See EA, *Improving pricing Plan Options for Consumers: Time-Varying Retail Pricing for Electricity Consumption and Supply*, 12 Feb 2025, pg 14.

⁹ See also UDL, *Working Together to Ensure our Electricity System meets the Future Needs of all New Zealanders*, 25 June 2025, para 13; UDL *Improving Plan Options for Consumer Time-Varying Retail Pricing for Electricity Consumption and Supply*, 26 March 2025, pgs. 5-6.

¹⁰ See EIA, s 9.

¹¹ "The purpose of the dispute resolution scheme is to ensure that—

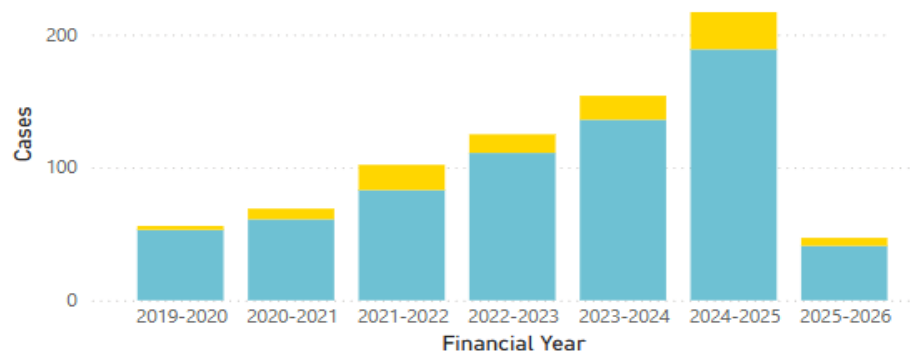
(a) any person (including consumers, potential consumers, and owners and occupiers of land, but excluding members of the scheme) who has a complaint about a member has access to a scheme for resolving the complaint; " EIA sch 4 cl 1; see also s 96.

Distributed Energy Resources

The ECS has seen a consistent flow of solar complaints and queries since 2019:

Solar Cases by Financial Year

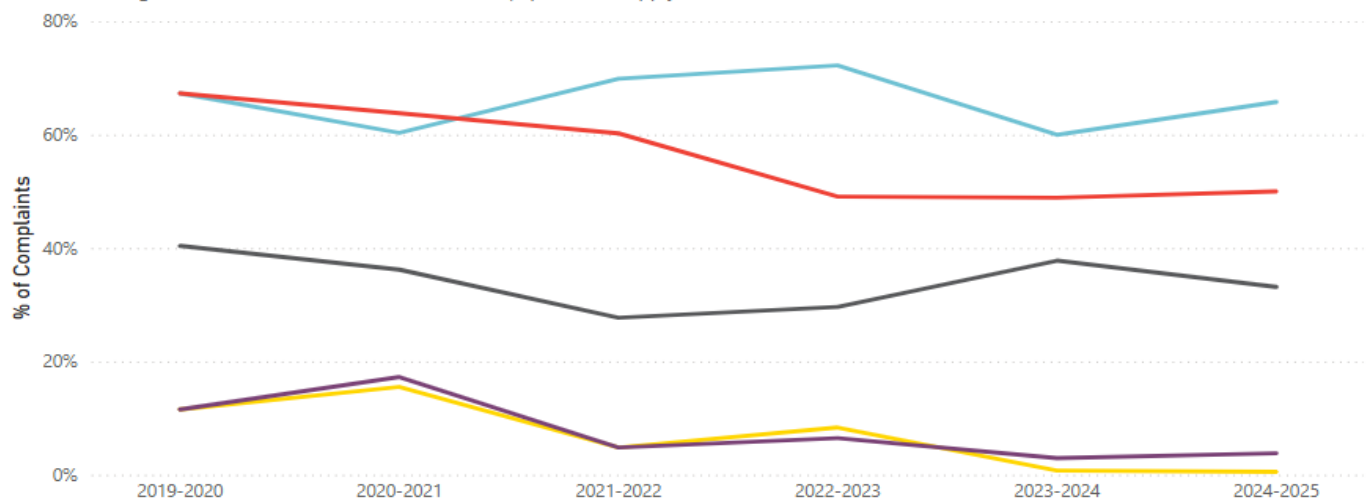
Case type ● Complaint ● Query



Solar issues are typical of complaints generally with the main issues being: billing, connections, customer service, equipment and supply:

Solar Issues

Tier 1 ● Billing ● Connection ● Customer Service ● Equipment ● Supply

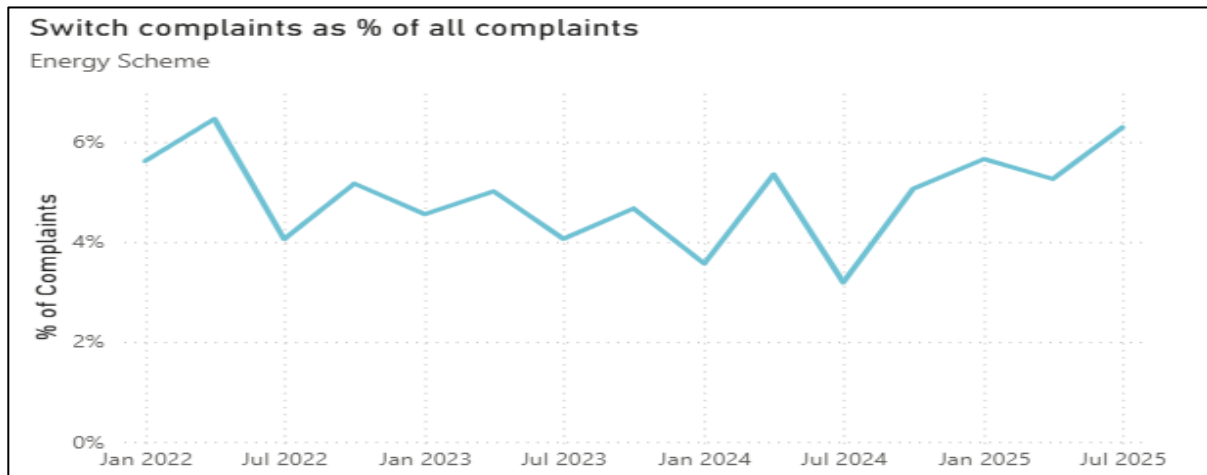


After receiving a UDL complaint summary most solar complaints are resolved by the retailer. However, the solar complaints that are accepted by UDL often take longer to resolve due to their complexity. The industry is in a maturing phase with some consumers not fully realising the nature of their long-term contracts and obligations.

UDL has also considered complaints about electrical vehicle charging. UDL was able to assist with resolving a metering complaint, and a complaint where a vehicle was charging incorrectly due to a voltage issue. These complaints were resolved after an investigation and the assistance of the retailer and/or distributor.

Switching Complaints

Switching issues generally group around the issues of: delay, an unauthorised switch, error, or a declined switch. Switching complaints are a constant aspect of the work of UDL making up about 6% of the electricity complaints received:



Smart Meters

Complaints involving faulty smart meters make up around 5% of resolved deadlocked complaints and 6% of resolved accepted complaints.

Issues raised about smart meters include: increase in billing amounts, not communicating or having a fault, and customer service issues related to their checking and installation.

Evolving Retailing – Commentary

UDL comments on the *Evolving Retail Paper* as the independent body responsible for resolving consumer complaints. It relies on other industry participants to comment more fully on the proposal's technical aspects.

UDL notes that stage 1 of the proposal allows the consumer to have two traders, one for consumption and one for distributed generation such as solar. In everyday language within the single ICP, there will be one channel for the generator to export electricity, and one for traditional retailing, where the consumer is sold electricity from the network.

UDL notes the proposal's limited definition of distributed generation electricity which excludes electricity that is *generated and consumed within the ICP*:

Consumption (or load) is electricity that flows from the distribution network through the meter to the installation control point (ICP). This is sometimes referred to as "import". Distributed generation is electricity that is generated within the ICP (eg from solar panels, or a battery) and flows from the ICP through the meter into the distribution network. This is sometimes referred to as "export". **In this paper, distributed generation excludes electricity that is generated and consumed within the ICP (often referred to as 'self-consumption').**¹²

¹² *Evolving Retailing Paper*, Appendix C, definition Consumption/load and distributed generation (emphasis not in the original).

We expect the above definition is intended to exclude normal consumers from the regime, by excluding the electricity they consume from their solar panels or batteries. However, the definition goes beyond this. In practical terms the above definition confirms distributed generation excludes all electricity generated by the DER, such as from solar panels, even if it is retailed to the consumer at their property.

UDL cautions care in the use of this definition. If it appeared in the EIA and Electricity Participation Code 2010, it may preclude a DER generator who owns the electricity generated at the consumer's premises and sells it direct to the consumer being considered a retailer. This is the approach taken by one of this country's largest solar retailers. The definition could essentially remove the protection afforded to consumers by removing their ability to complain to the ECS. This would be reducing the consumer protection in an area that is currently the subject of increased complaints. As the AER explains it is important for trust in the industry, that consumers who use services based on DERs and other new technologies have the same protections as traditional consumers:

If consumers understand they will receive consistent protection and outcomes regardless of the energy service they use, this is likely to promote trust and confidence in the energy market, thereby supporting competition, innovation and the increased uptake of consumer energy resources, which would promote the energy transition.¹³

Stage 1 of the proposal is the focus of UDL's response, however many of the points are applicable to the planned expansion of MTRs.¹⁴ UDL comments on the proposal under the general headings of policy considerations, process, and consumer complaints. The submission ends with a final observation that the introduction of MTRs is not a self-contained process, and likely will require review and amendment of the EIA as well as other regulatory instruments including the CCOs.

Policy Considerations

- 1) To take full advantage of the savings promised by MTRs good policy must include the consumer perspective. Reading through the paper, a useful issue to consider is: *If something went wrong at this point of the switch or customer relationship, would the consumer be able to easily identify who to raise their concerns with?*
- 2) In technical terms the EA's secondary objective is to protect the interest of domestic consumers and small business consumers. However, this objective is limited to the *dealings* of industry participants with consumers.¹⁵ As a consequence it is important that the dealings a retailer, distributor or generator has with the consumer are not opaque, but defined, transparent and easy to characterise. This policy work should be considered alongside the technical analysis necessary for the introduction of MTRs. To delay may result in less scope for addressing the needs of consumers, as new systems have already been agreed.

¹³ AER, *Review of Consumer Protections for Future Energy Services*, November 2023, 22.

¹⁴ *Ibid.*, 2.19-2.20, 3.5-3.6.

¹⁵ See EIA s 1; *Evolving Retailing Paper*, 8.23.

- 3) Australia appears not to have adopted the single meter model. The Australian regulator while seeing benefits of the model especially for small consumers, has taken a more tempered view of the model's costs and savings. UDL leaves the EA to assess what can be learnt from the Australian experience, and how relevant it is to the New Zealand context.¹⁶

Process

- 4) Turning to the revised process requirements, MTRs may require a review of some settled approaches to responding to consumer complaints. For example, the retailer is responsible for the quality of supply guarantee under the Consumer Guarantees Act 1993 (CGA).¹⁷ This appears a legislative choice, so the consumer has a clear point of contact, rather than having to choose between their retailer and distributor. While the retailer bears the responsibility for the CGA guarantee, network issues are often the cause of the interruption in supply. Therefore, the distributor responds to most CGA complaints through the retailer or with the knowledge of the retailer, directly to the consumer. With the introduction of MTRs, this process is less clear.
- 5) If there is an issue with an MTR it would seem that multiple retailers would have to be informed of the CGA complaint, especially if the cause is unknown. Furthermore, retailer contracts may differ in their terms about outages, and this could cause further confusion if it is determined both retailers should take responsibility for the outage. It is also possible that the exporter retailer may be acting as a generator only and not be retailing, further complicating the outage analysis.
- 6) On occasion a meter issue may also be the cause of the interruption in supply. MEPs are not part of the ECS. Retailers presently take responsibility for any metering issues. With the possibility of multiple retailers, this approach will require clarification, and it may be more efficient if the MEP is a member of the ECS. This clarification needs to take place in advance of the introduction of new switching protocols and any regulatory amendments.
- 7) UDL has previously alerted the EA to the industry's uneven response to CGA complaints.¹⁸ Some retailers and distributors have a good working relationship, while others struggle to respond to a complaint efficiently. The entry of MTRs into the market is likely to create more issues for consumers when something goes wrong. It should be seen as an opportunity to think about the best way to manage the quality of supply guarantee, inclusive of mandating specific lines of communication between retailers, generators, and distributors.
- 8) Turning to other process concerns the proposal allows a gaining MEP, prior to completion of the ICP switch, to change the metering installation.¹⁹ This change promotes efficiency, so the new trader is ready to provide their contracted services at the switch.²⁰ Yet in this circumstance it seems the losing retailer should now take responsibility for any metering

¹⁶ See Australian Energy Market Commission, *Final Rule Determination- National Electricity Amendment*, 26 February 2016, 1.5, A 1-A 3.3.

¹⁷ See Consumer Guarantees Act 1993, s 7A.

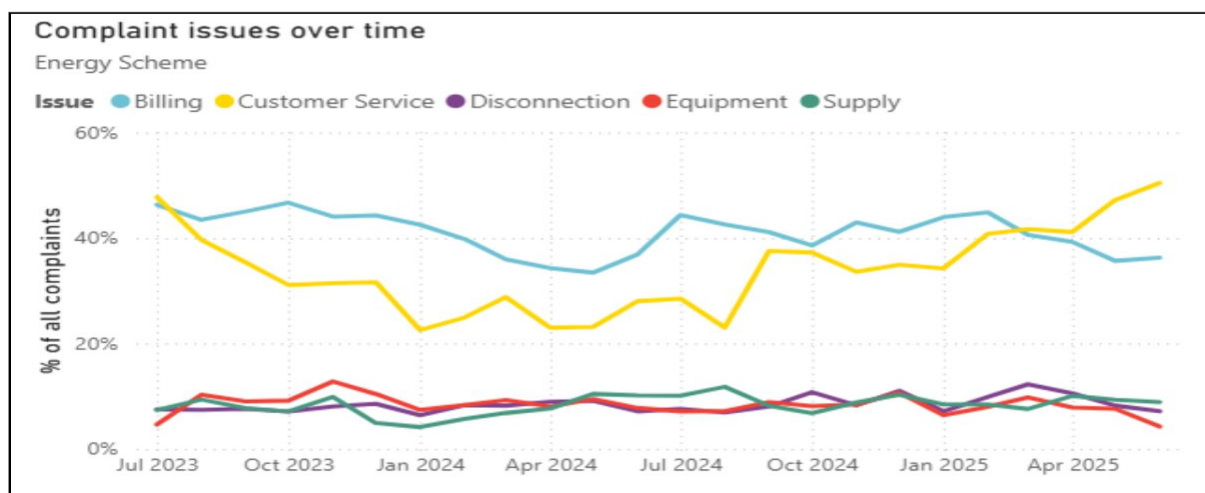
¹⁸ See UDL to EA, *Proposed Changes to the Default Distributor Agreement*, 31 July 2024, pg. 2.

¹⁹ See *Evolving Retailing Paper*, 4.43 (f).

²⁰ Ibid, 4.55.

issues, even though the switch has yet to occur and the losing retailer may not have a contract with the gaining MEP.

- 9) Billing issues are consistently one of the top issues raised by consumers:



- 10) UDL has previously raised the issue of billing information.²¹ It recommends that bills include: the name of the consumer's plan, if a read is actual or estimated, a brief explanation of the rates charged when they vary, any fixed term contract expiry date, and that credits are clearly itemised and explained rather than included within other figures (e.g. the running total). The EA will also be aware of the work of the Consumer Advocacy Council in proposing a model bill.²² The introduction of MTRs further highlights the importance of this issue, as consumers dealing with multiple retailers should have all the billing information necessary to assess these arrangements. Complete information will also allow the consumer to make informed choices about moving to other retail offerings.
- 11) It also seems unlikely that it is in the consumer's interest to receive multiple bills and credits for the same ICP. It would also be a backward step if MTRs require a consumer to pay for a third-party such as a billing aggregator to understand their billing and credits. The proposal is an opportunity for the EA to review billing practices and expand the scope of CCO 19 which mandates what information is to be placed on a bill.²³ CCO 19 does not respond to the needs of consumers, and without amendment, the introduction of MTRs will further draw attention to its limitations.
- 12) However, if billing aggregators are included in the MTR model, they should be defined as a retailer participant in some form, as their actions may have negative consequences on a

²¹ See UDL, *Improving Pricing Plan Options FOR Consumer Time-Varying Retail Pricing for Electricity Consumption and Supply*, 26 March 2025, pg. 7.

²² See Consumer Advocacy Council, <https://www.mbie.govt.nz/dmsdocument/29764-cac-research-model-electricity-bill-pdf>

²³ "In addition to any applicable requirements in clauses 11.30 to 11.30B, a retailer must clearly set out on each invoice: (a) a breakdown of the total amount owed, distinguishing between the current invoicing period and any overdue amounts; (b) the due date or dates for payment; (c) available payment options, or advice on where to find information regarding available payment options in supporting documentation (which may include the retailer's website or app); and (d) if bundled goods or services have been received by the customer, the amounts owing for each good or service" CCO 19 (emphasis not included).

consumer's purchasing of electricity. This will require changes to the EIA. This development would be in line with the Consumer and Product Data Act 2025 which foresees accredited requestors under that Act belonging to the ECS.

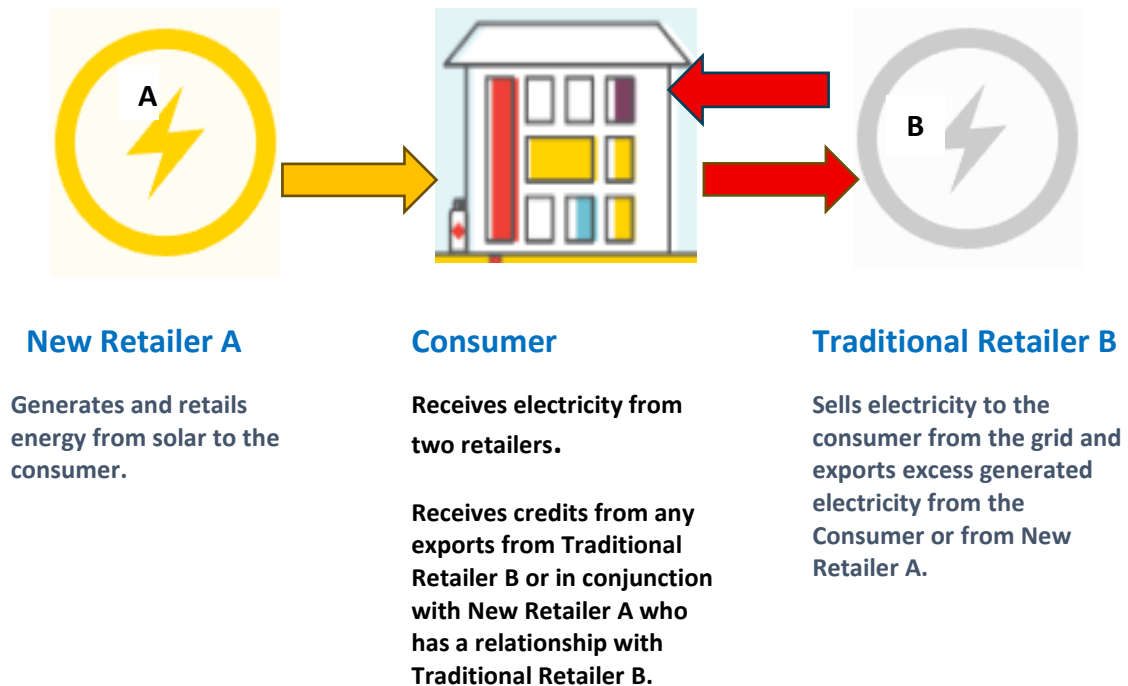
- 13) MTRs may also introduce a new actor to the industry, a dedicated flexibility aggregator. This business will not be retailing and exporting electricity, but it will manage the load of a consumer and reduce strain on the network. Such bodies may not meet the present definition of a retailer or distributor but would have a relationship with consumers in terms of consumption management and time of use. Currently this type of business would not be required to be a member of ECS. Yet, these types of new businesses will not only have a customer facing role but will also have the ability to affect a consumer's supply and be the focus of a CGA type complaint. It is also possible such flexibility aggregators become virtual generators by contracting with a lot of smaller DERs to offer larger export loads to the network. Therefore, it is recommended the EIA consider the role of flexibility aggregators, their functions, and how they may be defined as industry participants who fall under the ECS.
- 14) The *Evolving Retailing Paper* promises that consumers will not pay twice for the same service and that a consumer will not pay more than they would if there was a single trader for consumption and distribution. Distributors and MEPs will also be tasked with structuring charges based on the services provided rather than the number of traders per ICP.²⁴ These consumer guardrails will require careful management and review by an EA audit process.
- 15) Metering fees will also require clarification. A possible solution is that the consumption retailer should be responsible for the lease fee of the meter, and the MTR retailers pay for additional costs, such as a separate measurement channel for an electric charger. To lower fees for the consumer UDL invites the EA to consider requiring smart meters to be configured two ways at set up. This will reduce any subsequent reconfiguration fees, it also recommended all retailers use more accurate half hourly reads in their settlement and invoicing.
- 16) The above examples illustrate that any process amendments will affect the consumer experience. As the proposal develops an eye to mitigating any negative effects will be necessary.

²⁴ *Evolving Retailing Paper*, 2.14, 3.14.

Consumer Complaints

- 17) Under the EIA, “Transpower (other than in its capacity as system operator), and every distributor and retailer, must be a member of the dispute resolution scheme.”²⁵ It is not clear all actors in MTRs will be covered by the ECS. Using solar as an example, some consumers will have this arrangement:

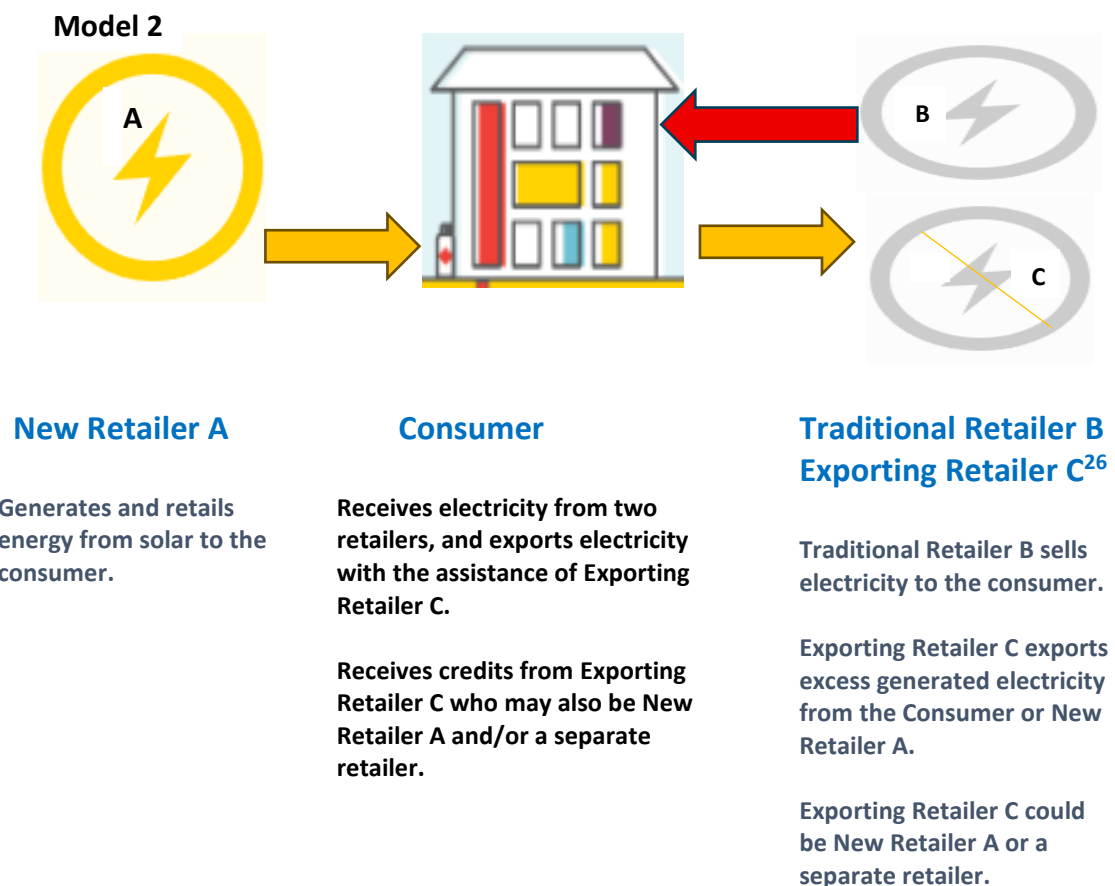
Model 1



- 18) UDL in the above model can review a complaint about the actions of New Retailer A and Traditional Retailer B as both retail or sell electricity to the consumer. There may be an issue if the complaint solely focuses on the export of electricity, as this is not retailing. In such a circumstance Traditional Retailer B is acting like or taking the place of the generator.
- 19) However, it might be argued that providing the service or management of exporting is so connected to the retailing of either New Retailer A (who may have some part in the provision of credits to the consumer) and Traditional Retailer B, that it could be considered by the ECS. However, any ambiguity may be resolved by amending the definition of retailing in the EIA to include some form of exporting electricity.
- 20) Furthermore, if New Retailer A has a relationship with Traditional Retailer B, in setting the price of electricity from the network, then arguably New Retailer A and Traditional Retailer B may jointly have to respond to a complaint about the selling of this electricity to the consumer. The issue then becomes assignment of liability as each retailer may be independently liable for a single event.

²⁵ EIA s 96.

- 21) The above model may vary, for example the homeowner may not have a New Retailer A and generate their own electricity and store it. It is possible the consumer may not or rarely export their electricity. Another alternative might be that New Retailer A does not retail electricity but only generates it, with the consumer owning the electricity. In such a case this New Generator might not fall under the ECS, unless it is considered a distributor due to the solar cabling connecting to the consumer's electrical installation. The solar company might also be viewed as operating a secondary network, especially when it is providing electricity to multiple units and/or properties.
- 22) However, the New Generator/Distributor is defined it seems that due to their closeness to the consumer it is appropriate they be part of the ECS.
- 23) The *Evolving Retailing Paper's* new model in respect of solar may be characterised this way:



- 24) Model 2 has the same issues as Model 1, except the matrix of relationships becomes more complex. It might be taken that Exporting Retailer C will also be New Retailer A. However New Retailer A's business model may include entering into a relationship with a traditional retailer, to be the export retailer. Additionally, New Retailer A, may leave retailing altogether so that Traditional Retailer B might manage the selling of electricity from solar generation.

²⁶ In the paper termed a Generation Trader.

25) This analysis of the above Models shows DERs often appear to expand or redefine the traditional understandings of distributor, generator, retailer or even customer networks. Therefore, a review of all these terms within the EIA appears required. In such a review the EA may be assisted by the work of the AER which has been looking at how DER products and services may be included within its regulatory scheme. It has suggested an energy service may be defined as a body that:

- *sells electricity to a consumer's premises*
- *unless exempted, on-sells or exports energy from an embedded network or manages the flow of electricity to and from an embedded network*
- *exports electricity from a consumer's premises*
- *controls, constrains, prevents or otherwise has a substantial impact on the flow of electricity to and from a consumer's premises.*²⁷

26) However, every complaint and its contractual arrangements will be fact specific, and the overall purpose of UDL raising these issues is to show the consumer challenges that can arise with MTRs. The EA may have to have further dialogue with the new DER retailers, distributors, generators, and new industry participants such as billing and flexibility aggregators to better understand the various DER business models and the regulatory changes and accommodations required.

Conclusion

27) UDL reiterates its support for MTRs, and notes that the proposal is motivated by new technologies, and their promise of providing for the consumer lower costs, improved services and a more reliable supply.²⁸

28) Many of the concrete proposals have considered the needs of the consumer but these may require further development. For example, only a distributor or a consumption retailer can initiate an electrical disconnection²⁹ and only the consumption trader recorded in the registry at an ICP may initiate an electrical connection. However, could the consumption retailer act on behalf of the DER retailer, and disconnect the customer for some reason based on the export of electricity? This will be the case in respect of work on the meter: "The generation trader would be able to initiate work on the generation equipment and wiring, but if the supply to the installation is to be electrically disconnected **this would need to be initiated through the consumption trader.**"³⁰

29) Moreover, if a consumer wishes to make a complaint about an electrical disconnection, who should take responsibility? The consumption retailer, generator or the new industry actor such as a flexibility aggregator who may all be parties involved with electricity transactions at the ICP? Clarifying the answers to these types of questions, will be vital for consumers. They likely will require some concurrent review of the CCOs. Notably the AEMC's tempered approach to the single meter model was in part out of concerns that the

²⁷ See AER, *Review of Consumer Protections for Future Energy Services*, Nov 2023, 26. UDL thinks limb 4 may benefit from the addition of the word "increasing".

²⁸ See *Evolving Retailing Paper*, pg 2.

²⁹ *Ibid.*, 3.14.

³⁰ *Ibid* (emphasis not on the original).

model would likely require review and changes to consumer rules about disconnections, hardship, and life support obligations.³¹

- 30) The issue of connections and reconnections may also require further analysis, and consideration. There may be examples where retailers and/or other industry participants have divergent interests, and how these can be managed with the consumption trader may need a set of principles.³² Clarity for the consumer will be paramount.
- 31) The introduction of MTRs is then not self-contained and even small changes will affect other regulations and industry practice.

Next Steps

Thank you for the opportunity to comment on the *Evolving Retailing Paper*. If you have any questions, please contact me at: paulb@udl.co.nz



Paul Byers - Legal and Policy Officer Pou Ture Me Ngā Kaupapahere

³¹ *Final Rule Determination- National Electricity Amendment, A.3, A 3.3*. The rules are termed the National Energy Retail Rules.

³² See *Evolving Retailing Paper*, para 3.14(v).