

17 February 2026

Electricity Authority
By email: policyconsult@ea.govt.nz

Evolving multiple trading relationships and switching: supplementary consultation paper

Meridian welcomes the opportunity to comment on the supplementary consultation. We appreciate the considerable work the Electricity Authority has undertaken to refine the proposals and to address feedback from previous submissions.

The Authority's revised, lower-cost, registry-based approach to enabling multiple trading relationships (MTRs) is a significant improvement on earlier iterations. Targeting only flagged ICPs and reducing system changes for parties not involved in MTRs should enable any benefits to be delivered more quickly and at lower cost than the earlier proposal.

However, significant uncertainty remains regarding the scale and distribution of the costs and benefits of the revised proposal. While the cost-benefit analysis applies a practical approach to the uncertainty, the limited clarity around key cost drivers, expected benefits, and their distribution across consumers reduces confidence in the case for change.

We also recommend that the Authority provides more clarity on retailer participation and obligations:

- The consultation frames MTRs as a consumer choice, but it is not explicit as to whether retailers participate upon customer request, or voluntarily. We recommend that the Authority clearly confirms that retailer participation is optional, and that Code obligations apply only once a retailer opts to offer a MTR service.
- Assuming that participation is voluntary, we also recommend confirmation that retailers may reasonably scope or limit their MTR offerings (e.g. by plan, region, meter type) without breaching the Code, provided these limitations are transparently disclosed to consumers
- We note that the revised proposal will still impose system changes on retailers who do not offer MTRs. In particular, registry processes will need to be updated, and retailers will be responsible for ensuring MTR flags are correctly applied. As customers do not have registry access, retailers will need clear processes for agreeing to the MTR flag to avoid initiating a MTR pathway with a retailer that cannot support it. We recommend that the Authority provide greater clarity on how these arrangements will operate in practice.

Concluding remarks

Nothing in this submission is confidential and it can be released in full. I can be contacted to discuss any of the points outlined above.

Nāku noa, nā



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