14 September 2026

Electricity Authority
PO Box 10041
Wellington 6143

By email to: policyconsult@ea.govt.nz

Dear Authority team,

Submission to the Electricity Authority on improvements to industry switching processes

1 Introduction

Electricity Networks Aotearoa (ENA) appreciates the opportunity to comment on the Authority's technical consultation on improvements to industry switching processes.

ENA is the industry membership body that represents the 28 electricity distribution businesses (EDBs) that take power from the national grid and deliver it to homes and businesses (our members are listed in Appendix A).

EDBs employ over 7,800 people, deliver energy to more than two million homes and businesses, and have spent or invested $6.8 billion in network assets over the last five years. ENA harnesses members' collective expertise to promote safe, reliable, and affordable power for our members' customers.

2 Overall support

ENA continues to support the switching reforms overall. As we said in our July 2025 submission,[1] the trader, metering equipment provider and distributor switching proposals are generally reasonable improvements to the switching process, and we expect the benefits for switching parties to outweigh the costs for electricity distribution businesses (EDBs).

ENA considers 12 months broadly reasonable, provided the final requirements do not include material retrospective data-reconstruction obligations (see section 3 below). It is materially more workable than some recent implementation timeframes faced by EDBs and should provide reasonable time for system changes, testing and process updates. We appreciate the Authority's intention to work with participants through implementation.

ENA also welcomes two developments since the 2025 consultation. First, the draft Code is now clear that responsibility for ICPs transferred between distributors changes at 00:00 on the intended transfer date, addressing the ambiguity ENA identified between intra-day time stamping and the actual transfer time. Secondly, we welcome the Authority's decision not to progress multiple trading relationships (MTRs) to

[1] ENA, ENA_MTR_submission_Redacted.pdf, 29 July 2025

Code amendment at this stage and to undertake further work on costs, benefits, risks and implementation pathways before deciding whether to proceed.

The practical impacts of some proposed changes vary between EDBs, reflecting differences in ICP management systems, contractor arrangements and operating processes. Individual members may therefore raise additional issues in their own submissions. ENA has focused here on the issues with the broadest implications across the sector.

3 Network extensions drafting remains unresolved

Our principal concern is the proposed requirement for distributors to identify ICPs connected to a network extension and record a reconciliation type code in the registry. This is not a new concern. ENA expressly raised the issue in its July 2025 submission (Q28, p 10), supported by Chapman Tripp's advice at paragraphs 44–48 of Appendix C (p 21 of ENA's submission).

At that time, our understanding was that the Authority intended the requirement to operate prospectively only. Chapman Tripp nevertheless observed that the proposed drafting required a distributor to provide a reconciliation type code identifying a network extension "for each ICP on the distributor's network". It therefore read the drafting as requiring distributors to identify existing network extensions as well, and recommended clarification if that was not the Authority's intent.

Nothing in the Authority's subsequent decision appears to change the previously understood intention that this requirement would apply prospectively. However, the current Code drafting still appears to impose a retrospective obligation: paragraph 7.4(b) proposes that distributors allocate a reconciliation type where an ICP is connected to a network extension, while clause 7(1)(d) of Schedule 11.1 applies that requirement to each ICP on the distributor's network.

In practice, EDBs do not generally hold a complete, structured dataset identifying all historic network extensions. Retrospective compliance would therefore require affected EDBs to reconstruct historic information from records and systems that were not designed for this purpose. In addition to the implementation effort involved, this creates a risk that retrospective registry data will be incomplete or inconsistent across EDBs.

ENA remains unclear what regulatory value would be gained from retrospectively populating potentially incomplete historic information in the registry. We therefore recommend removing the requirement to identify existing network extensions and applying any new coding requirement prospectively only.

If the Authority considers retrospective identification is necessary, it should explain the specific problem the information is intended to solve, how the information will be used, and why the expected benefit justifies the implementation and ongoing compliance cost. The drafting should then make the intended temporal application explicit.

On the basis that network-extension coding applies prospectively, ENA considers the proposed 12-month implementation period broadly workable. If retrospective identification is retained, however, that would represent a materially larger and previously unexpected implementation task. The Authority should then revisit the implementation period, taking account of both the additional work required and the wider programme of regulatory change EDBs are implementing.

4 Authority intervention in distributor switches

A second issue raised in ENA's 2025 submission also appears unresolved. ENA previously noted that an Authority intervention very late in a distributor switch could create operational and process challenges for all parties, including consumers, and suggested that the Authority's intervention should be subject to a clearer time limit (Q17, p8).

The current proposal continues to provide that the Authority may stop a distributor switch where circumstances reasonably require, at any time during the switch process, and clause 6 of Schedule 11.2 also permits the Authority to instruct the registry manager to reverse a completed transfer. The paper gives an example of a losing distributor reasonably disputing consent, but does not otherwise explain why such a broad and open-ended intervention power is required or the circumstances in which it is expected to be used.

ENA recommends that the Code distinguish more clearly between the Authority stopping a transfer before completion and reversing a transfer after it has taken effect. The circumstances and criteria for each should be specified in the Code, including any relevant timing limits or safeguards. Supporting guidance could then explain how those criteria are expected to operate in practice.

A completed transfer has already changed responsibility for the relevant ICPs and may have triggered downstream systems and processes. Reversal therefore raises different operational risks from stopping a transfer before completion. Clear criteria would allow EDBs to design their systems and processes around the circumstances in which either form of intervention may occur. Greater clarity would help participants manage the relevant risks and avoid circumstances that might unintentionally trigger Authority intervention.

ENA's responses to the Authority's technical submission form are attached as Appendix B.

ENA thanks the Authority for considering these comments. If you have any questions about ENA's submission please contact Gemma Pascall, Regulatory Manager ( ).

Yours sincerely

Gemma Pascall

Regulatory Manager

Appendix A: ENA Members

Electricity Networks Aotearoa makes this submission along with the support of its members. Listed below are the lines companies represented:

- Alpine Energy
- Aurora Energy
- Buller Electricity
- Centralines
- Counties Energy
- EA Networks
- Electra
- Electricity Invercargill
- Firstlight Network – owned by Powerco
- Horizon Networks
- MainPower
- Marlborough Lines
- Network Tasman Limited
- Network Waitaki
- Northpower
- Orion New Zealand
- OtagoNet – represented by PowerNet
- Powerco
- Scanpower
- The Power Company – represented by PowerNet
- Top Energy
- The Lines Company
- Unison Networks
- Vector
- Waipa Networks
- WEL Networks
- Wellington Electricity
- Westpower

Appendix B – Technical submission form

Improvements to switching processes

Submissions should be emailed to policyconsult@ea.govt.nz with 'Consultation – Improvements to switching processes' in the subject line by 5pm, Monday 14 September 2026.

The Authority invites technical submissions on the Code amendment drafting to give effect to its decisions on ICP switching process changes. We are not seeking further submissions on the intended decisions or their supporting rationale.

Name	Gemma Pascall
Organisation	Electricity Networks Aotearoa (ENA)

Question 1: Would you prefer an implementation timeframe longer than 12 months? If so, please indicate if 15 or 18 months is preferred and give reasons why.

ENA considers the proposed 12-month implementation period broadly reasonable on the basis that network-extension coding applies prospectively. It should provide a reasonable period for registry enhancements, participant system changes, testing and process updates. If retrospective identification of existing network extensions is required, however, the Authority should revisit the implementation period given the materially greater work involved.

We welcome the Authority's intention to work with participants through implementation.

Question 2: Are there any parts of the Code drafting that, in your view, do not accurately reflect the provisional decisions outlined in this paper? If so, please identify the issue and set out any proposed amendment(s).

Part/ Clause	Comments
Part 1 Preliminary provisions **1.1 Interpretation**	
Part 10 Metering **Schedule 10.6 - Metering equipment provider ongoing obligations and functions**	
Part 11 Registry information management **Schedule 11.1 - Creation and management of ICPs, ICP identifiers and NSPs**	Clause 7(1)(d) retains an issue ENA raised in its July 2025 submission (Q28, p 10) and in Chapman Tripp's advice at paragraphs 44–48 of Appendix C (p 21 of ENA's submission). The clause requires a distributor to provide a reconciliation type code for each ICP on its network, including to identify whether the ICP is connected to a network extension. Our understanding in 2025 was that the Authority intended identification of network extensions to be prospective only. The drafting nevertheless appears to require EDBs to identify existing network extensions. EDBs do not generally hold a complete structured dataset identifying all historic network extensions. Because that information may need to be reconstructed from historic records that were not designed for this

Part/ Clause	Comments
	purpose, there is also a risk that the resulting registry information would be incomplete or inconsistent between EDBs. ENA is not clear what regulatory value would be gained from retrospectively adding potentially incomplete historic information to the registry. ENA recommends that the requirement be amended so that any network-extension coding obligation applies prospectively only. If the Authority considers retrospective identification is necessary, it should explain the problem this information is intended to solve, how it will be used, and why the expected benefit justifies the implementation and compliance cost. The Code should then state the intended temporal application expressly. Please also refer to section 3 of our covering letter.
Schedule 11.2 - Transfer of ICPs between distributors' networks	Clause 6 permits the Authority to instruct the registry manager to stop a transfer and to reverse a completed ICP transfer. The consultation paper also describes the Authority as able to stop a distributor switch where circumstances reasonably require at any time during the switch process. ENA raised this issue in its 2025 submission (Q17, p8), noting that intervention very late in a switch could create operational and process challenges. The current paper gives an example of a losing distributor reasonably disputing consent, but does not otherwise explain the circumstances in which intervention or reversal is expected. ENA recommends that the Code distinguish explicitly between stopping a transfer before completion and reversing a completed transfer, and specify the circumstances, criteria and any relevant safeguards applying to each. Supporting guidance could provide further operational detail. This would give EDBs sufficient certainty to design systems and processes around the circumstances in which intervention may occur. Please also refer to section 4 of our covering letter.
Schedule 11.3 - Trader switching	
Schedule 11.4 - Metering equipment provider switching and registry metering records	
Table 1: Registry metering records Part 16A Audits	

Question 3: Other feedback

ENA reiterates its overall support for the switching reforms and the proposed 12-month implementation period (assuming retrospective application is not required). We also appreciate that Schedule 11.2 now makes clear that the gaining distributor takes responsibility for transferred ICPs from 00:00 on the intended transfer date, addressing the time-stamping ambiguity raised in our 2025 submission. ENA also welcomes the Authority's decision to pause MTR Code amendments while further work is undertaken on design, costs, benefits and implementation. Please refer to our covering letter for more detail on our remaining concerns.