12 AUGUST 2026: SUBMISSION TO ELECTRICITY AUTHORITY REGARDING IMPROVING CONSUMER ACCESS AND CHOICE

The electricity market must work harder for disadvantaged households

A well-functioning electricity market should deliver reliability, competition, innovation and choice to all New Zealand households. Entrust welcomes the Electricity Authority's commitment to making sure the "system works for everyone".[1]

Not all Kiwi households and families are benefiting from competition.

Some households face barriers to accessing supply, understanding their options, comparing plans or switching retailers. These barriers can include low income, hardship, credit issues, literacy issues, disability-related challenges, age-related barriers, limited digital access, and a lack of confidence that switching will leave them better off.

Households with credit problems may have limited electricity supply options or may be forced onto prepay regardless of whether it is suitable for them. These are some of the most disadvantaged members of society and should not be forgotten or left behind.

Summary of Entrust's submission

- The electricity market is failing to protect consumers when hardship and credit barriers leave households with limited retailer choice, or they are forced onto prepay arrangements. Consumers should not be forced onto prepay or left without power because they cannot pay in advance or pay more for what can be an inferior service.

- We support investigating barriers due to credit-related reasons. We think it would be useful to establish quantified evidence of the scale of the problem and the harm suffered by disadvantaged consumers. This information would be important also for informing the potential cost implications of any potential policy changes.

- The Authority's interest in social retailing is welcome. Retail models designed to support social outcomes can help consumers in hardship. We think it would be useful to explore the role that social retailers play in other jurisdictions and how this compares with New Zealand.

- The benefits of competition and lower cost supply options must reach households who need it most. It isn't just consumers on low incomes or suffering from credit issues who miss out. We support Authority initiatives that target low-income, elderly, disadvantaged and other vulnerable consumers.

- Falling household switching rates is a warning sign that the electricity market is failing to adequately deliver meaningful or adequate choice.

- Access and affordability cannot be separated from competition. Improving access and engagement will not deliver full benefits until wider retail and wholesale competition issues are addressed. A strongly competitive market is a prerequisite for affordability and meaningful choice.

[1] https://www.ea.govt.nz/news/press-release/electricity-authority-seeks-feedback-from-consumers-on-access-to-electricity-and-choice-of-plans/

Entrust's submission

Entrust supports the Electricity Authority's focus on improving consumer access, choice and engagement. The issues that the Authority is looking at are an important part of the Authority's role and responsibilities to protect and promote the interests of the most vulnerable and disadvantaged members of society. The Government and Electricity Authority have been making successive improvements to consumer protection, but more work is needed.

Entrust considers that a holistic approach should be taken to dealing with these responsibilities.

If the Authority is going to improve consumer access, choice and engagement, as well as electricity affordability, it should treat them as part of a broader competition problem, not just a consumer-protection issue. The decline in households switching electricity retailers and the challenges faced by low-income and vulnerable consumers show the electricity market is not delivering meaningful choice for many households. We recommend stronger retail and wholesale competition measures, better consumer information and switching support, targeted action for disadvantaged consumers, and stronger protections for prepay customers so electricity remains affordable, accessible and fair for everyone.

The challenges faced by consumers with limited supply options warrant investigation

Entrust supports the Authority's investigation into the challenges faced by consumers who have limited electricity supply options because of credit-related reasons, or who may be forced onto prepay regardless of whether it is suitable for their needs and circumstances. Consumers with limited electricity supply options include some of the most disadvantaged members of society and should not be forgotten or left behind.

The electricity retailer commercial drivers and the Authority's consumer protection objectives aren't necessarily aligned as consumers with credit-related issues can be seen as costly or higher risk to supply. The Authority will need to carefully consider the potential cost implications of any prospective policy changes or amendments to the Consumer Care Obligations to ensure the changes are well targeted and the benefits of improved protection and consumer welfare exceed the potential increase in retail cost to serve.

The Authority's analysis shows that, depending on where they live, disadvantaged customers with credit issues may have access to only one to three retailers that routinely accept them. This points to very limited competition for these customers. In Auckland, despite being the largest city in the country, consumers with credit issues may only have choice between two electricity retailer options, even though there are numerous other electricity retailers.[2] Across New Zealand, nearly 40 per cent of households with credit issues may have only one retailer option. The Herfindahl-Hirschman Index (HHI) is a useful measure of market concentration and competition and is 10,000 for this group, indicating a full monopoly.[3]

It could be useful for the Authority to establish how many customers are affected[4] and how much extra they pay for electricity because their choices are so constrained. We

[2] https://www.emi.ea.govt.nz/Retail/Reports/R_MSS_C?MarketSegment=Res&RegionType=MAIN_CENTRE&_si=tg|market-structure,v|3

[3] At best, the three-firm Concentration Ratio (CR3) is 100% in just 7% of New Zealand.

[4] It won't just be consumers that have been declined by an electricity retailer, as some consumers in hardship will select retailers that are most likely to be willing to provide them with services.

fully support the Authority's focus on trying to get better information to understand the nature of the scale of the problem before considering potential remedies.

Targeted protections may be needed for the most disadvantaged members of society, as many worthwhile Electricity Authority initiatives, such as requiring retailers to advise customers of the "best plan" available, will not help consumers who have limited options.

Protecting the most disadvantaged members of society

Entrust shares the Authority's concern that not all Kiwi households and families are benefiting from competition. Our most recent submissions on the Authority's work priorities[5] and improved billing, consumer plan comparison and switching[6] detailed how disadvantaged groups miss out the most.

It isn't just consumers on low incomes or suffering from credit issues, that are missing out on the benefits of competition. Some consumers face literacy barriers, disability, age-related barriers, hardship, credit problems or difficulty navigating digital comparison tools. Others may simply lack confidence that switching will leave them better off. Difficulty accessing or using the internet to use services like Billy can be an impediment to switching.[7] Consumers that can least afford electricity are likely to be paying the most.[8]

It could be useful to look at these issues as part of the scope of initiatives to address "barriers that prevent some consumers from accessing electricity supply or exercising meaningful choice". Helping ensure disadvantaged and vulnerable consumers are on the lowest cost electricity plans and, most importantly, supplied by the lowest cost retailers are key initiatives for energy affordability and the Authority's consumer protection objective.

Entrust considers that it could be useful to drill into the consumer switching statistics and break it down into different consumer groups to establish a better understanding of who is missing out the most on the benefits of competition. It would also be useful to update analysis undertaken by the Electricity Price Review into the savings available to consumers from switching[9,10] to get quantified evidence of the scale of the extra electricity costs some consumers and consumer groups face because they are not actively engaged with the electricity market or are missing out on the benefits of competition, including the customers the Authority has identified in its consultation who may not have any choice of electricity supplier.

An electricity market that works for everyone must deliver practical, usable choice for all households, not just for confident consumers with the time, tools and resources to search for better deals.

We recognise targeting consumers who are not actively engaged in the electricity market or switching is not easy and reiterate that we see this as something which should be part of an ongoing work programme, with the Authority carefully monitoring and reporting on progress. Getting a factual, evidence-based understanding of the problem is a critical starting point for addressing these problems.

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[5] https://www.entrustnz.co.nz/media/ptyjc4jj/entrust-work-priorities-26-27_15-dec-2025.pdf
[6] https://www.entrustnz.co.nz/media/ramhpnzh/entrust-consumer-billing-switching-12-november-2025.pdf
[7] Not all consumers have the computer literacy or ability to upload a bill to Billy, but the accuracy of Billy is highly dependent on doing so.
[8] See, for example, https://www.entrustnz.co.nz/media/ramhpnzh/entrust-consumer-billing-switching-12-november-2025.pdf and https://www.entrustnz.co.nz/media/r5mf5224/2024-submission-re-consumer-plan-comparison-and-switching-6-mar.pdf.
[9] https://www.mbie.govt.nz/dmsdocument/4329-electricity-price-review-analysis-of-retail-billing-data
[10] The Authority had monitored residential savings as part of its EMI database, but this was disestablished without explanation from 2018: https://www.emi.ea.govt.nz/Retail/Reports/Tagged/residential-savings.

Stronger protections needed for electricity prepay customers

Entrust welcomes that the Authority is looking at issues with prepay. Prepay arrangements are an area of the Consumer Care Obligations that warrants more attention, particularly given the higher risks faced by vulnerable households.[11]

Entrust believes the protections for consumers on prepayment plans should be strengthened. Prepay may help some households manage budgets, avoid bill shock or get access where a traditional account is hard to obtain, but it can expose vulnerable consumers to higher costs, repeated disconnections and reduced protections compared with post-pay customers. Prepay is not suitable for everyone.

Entrust considers that the current approach to prepay in the Consumer Care Obligations is very light-handed, especially when compared with the detailed and more prescriptive protections that apply to post-pay consumers. The contrast between the rules for prepay and post-pay is stark.

Electricity is an essential service. Going without power isn't like running out of credit or data on your phone. There are real and potentially severe real-world consequences. The Authority has commented that electricity is "fundamental to our daily lives" and "enables people to participate fully in modern life". Power is needed for "the heating that warms our homes in winter, the ovens that cook our meals and the devices that connect us with family, friends and work."[12] We share the Authority's concern that some consumers may face serious consequences if they go without power and "For households with children, inadequate heating, lighting, hot water or refrigeration may affect health, sleep, study and everyday family routines."

Consumers should not be left without power because they cannot afford to pay in advance. Consumers going without power on a regular basis because they run out of credit is not an outcome that aligns with the Authority's consumer protection objective and role.

Entrust does not believe retailers should force consumers onto prepay, particularly if they are vulnerable or disadvantaged. Entrust considers that it would be worth looking at amending the Consumer Care Obligations to prevent retailers forcing vulnerable consumers onto prepay as a condition of supply.[13]

The experience in the United Kingdom also highlights the importance of consumer protection in relation to prepay, and that consumers on prepay are particularly vulnerable. We encourage the Authority to look at United Kingdom experience to determine what lessons there are for New Zealand regulations.[14]

Potential issues with disparities between prepay and post-pay tariffs warrant investigation

Entrust welcomes the Authority's response to submissions from Entrust, and other consumer advocates, to address disparities in prepay tariffs and fees and improve transparency by publishing data on prepay plans costs.

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[11] https://www.entrustnz.co.nz/media/fkpjzhuk/entrust-submission-re-consumer-care-obligations_6-september-2024.pdf
[12] https://www.ea.govt.nz/news/general-news/why-a-well-regulated-electricity-sector-matters-to-new-zealand/
[13] A rule saying retailers cannot force certain protected consumers onto prepay would be similar in nature to the existing rule saying retailers cannot disconnect medically dependent consumers.
[14] There has been a lot of problems in the United Kingdom (UK) with consumers being forced onto prepay including vulnerable consumers that are not supposed to be put on prepay under UK consumer care rules.

We have raised concerns previously that consumers on prepay can pay more for electricity than consumers on post-pay and welcome that this is something the Authority is looking into.[15]

There can be additional fees when you top up which can be particularly problematic for consumers that have to make small, frequent top ups. There are also fewer plan options, and you can't access cheaper deals for off-peak power[16] which large retailers are required to offer post-pay customers. Prepay customers may be paying more for a more limited service. That would be the opposite of what a competitive electricity market is supposed to deliver.

Entrust doesn't consider vulnerable households should have to pay more to be on prepay or be without power if they can't afford to pay in advance for all their power. Any suggestion that prepay is a more expensive service to supply should be backed up with verifiable evidence.[17]

The Consumer Care Obligations' requirement that retailers disclose any cost difference between prepay and post-pay arrangements does not adequately deal with consumers paying more on prepay. If a consumer is on prepay because that was the only option available to them any such warnings will be moot.

Prepay disconnections are far higher than post-pay

We welcome that the Authority has listened to Entrust, and other consumer advocacy groups, and is now publishing data on disconnections for non-payment for prepay as well as post-pay arrangements.

The level of prepay disconnections for non-payment is substantially higher than for post-pay and reinforces our concerns with the light-handed approach taken in the Consumer Care Obligations to prepay (see the diagrams below) e.g. post-pay disconnections average between 0.03 and 0.05% per customer per month while prepay averages between 80 and over 100%. Prepay customers are 500 times more likely to be disconnected for non-payment than post-pay customers.

Entrust considers that it could be useful for the Authority to investigate the wide difference in prepay and post-pay customer experience with disconnections and why prepay disconnection outcomes vary so widely across retailers. These numbers suggest changes may be needed to the Consumer Care rules around prepay.

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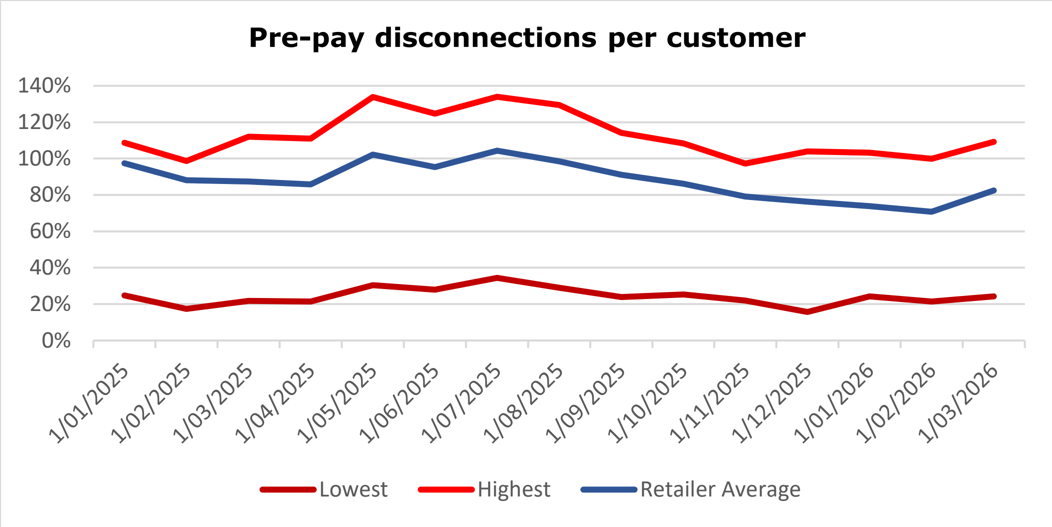
[15] We first expressed unease about some prepayment practices that were harmful to or may otherwise disadvantage low-income consumers and households having difficulty paying their bills during the Electricity Price Review. We have subsequently raised the issue in response to the Authority's consultations on Consumer Care.

[16] https://www.powerswitch.org.nz/finding-the-best-power-plan/should-you-sign-up-for-prepay-power

[17] The Consumer Advocacy Council, for example, raised concerns "some retailers are charging consumers on pre-pay plans for disconnection and reconnection fees, even when there is no cost to the retailer. Some of these costs appear punitive …"


Pre-pay disconnections per customer
140%
120%
100%
80%
60%
40%
20%
0%
1/01/2025
1/02/2025
1/03/2025
1/04/2025
1/05/2025
1/06/2025
1/07/2025
1/08/2025
1/09/2025
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Lowest
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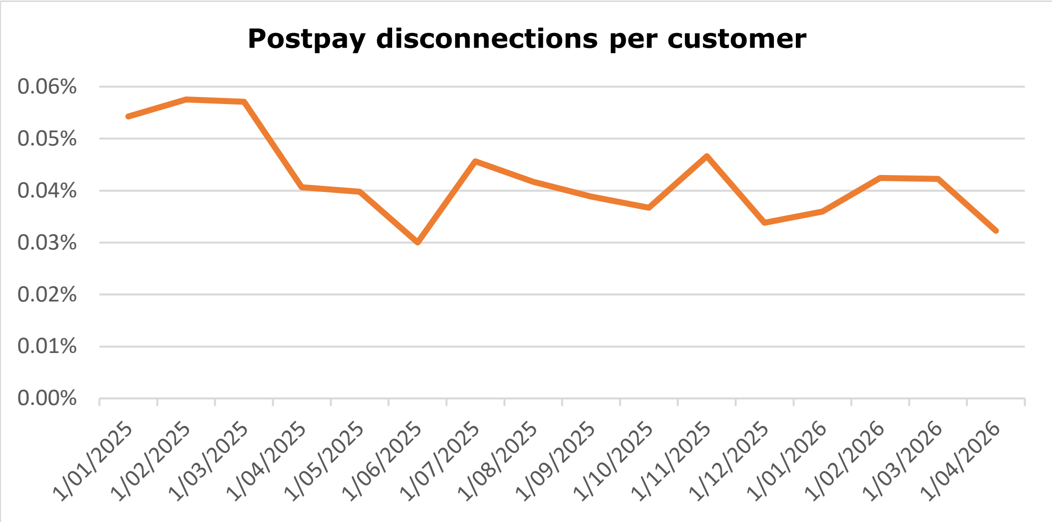
Retailer Average


Postpay disconnections per customer
0.06%
0.05%
0.04%
0.03%
0.02%
0.01%
0.00%
1/01/2025
1/02/2025
1/03/2025
1/04/2025
1/05/2025
1/06/2025
1/07/2025
1/08/2025
1/09/2025
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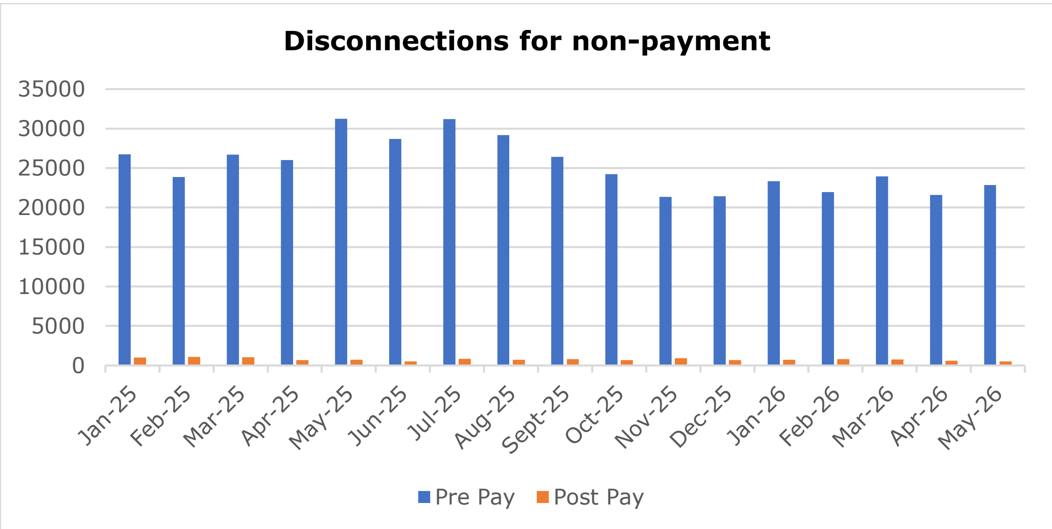
1/03/2026
1/04/2026


Disconnections for non-payment
35000
30000
25000
20000
15000
10000
5000
0
Jan-25
Feb-25
Mar-25
Apr-25
May-25
Jun-25
Jul-25
Aug-25
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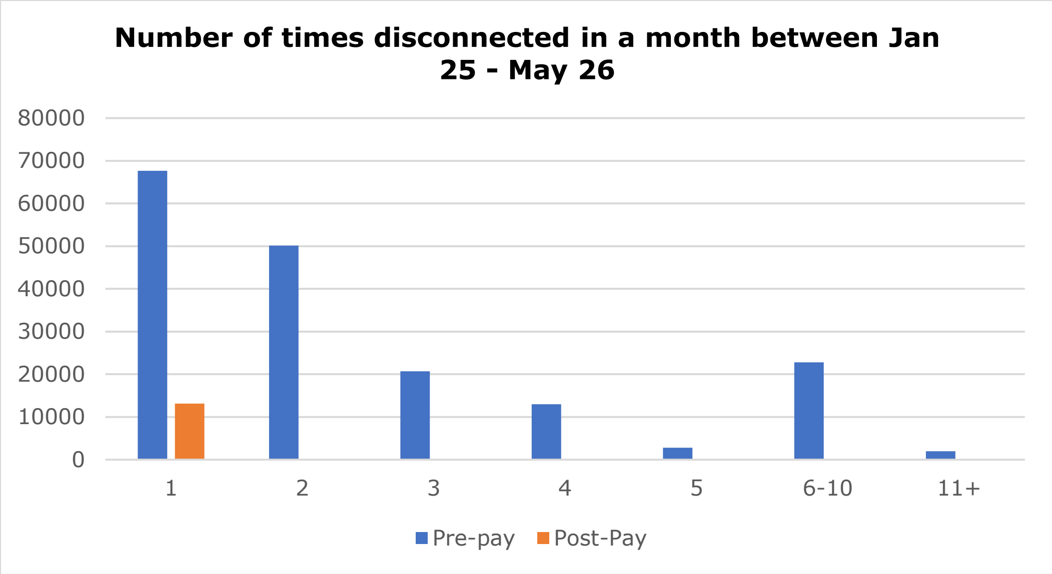
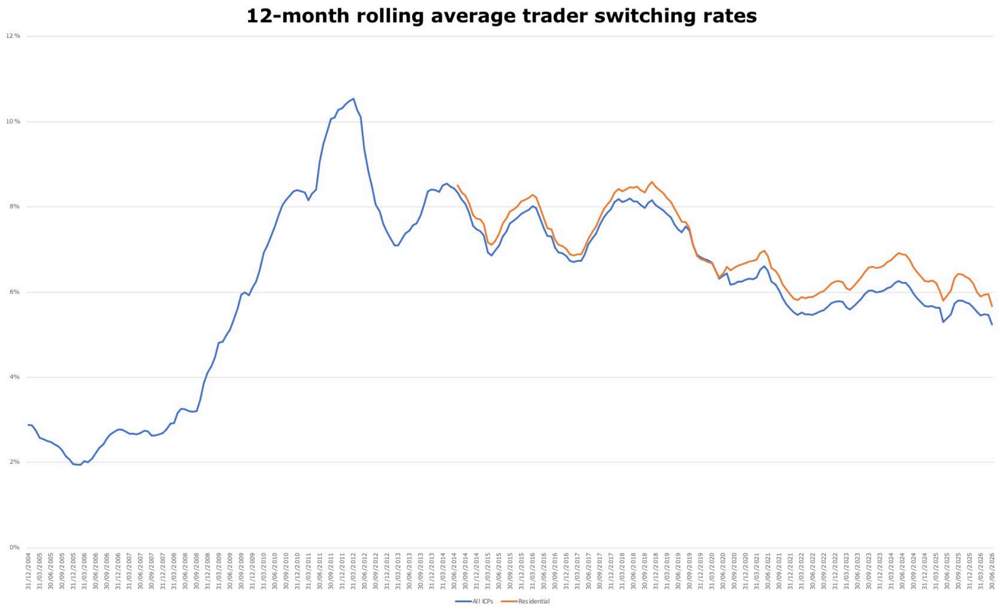
May-26
Pre Pay
Post Pay



Power consumers are switching off from New Zealand's electricity market

We welcome the Authority's recognition of the need for "Structural improvements to competition and market performance" and agree this is not a "quick fix".[18] It seems clear broader competition problems are adversely affecting all consumers. Based on Electricity Authority data, and Entrust's own consumer surveys, it looks like overall residential consumer engagement in the electricity market is materially declining. For example, residential switching dropped from a peak of 8.58% in November 2018[19] to 5.67% in June which is the lowest it has been since the Authority was established.[20]

The rate of switching has more than halved since the Authority was established.



[18] https://www.ea.govt.nz/news/general-news/why-a-well-regulated-electricity-sector-matters-to-new-zealand/

[19] It is likely residential switching peaked at over 10% in 2012, but Electricity Authority data does not separate out residential switching from all customer switching this far back.

[20] https://www.emi.ea.govt.nz/Retail/Reports/R_SwT_C?DateFrom=20130901&DateTo=20260630&MarketSegment=Res&SwitchTypecode=TR&ShowAs=Rate12M&_si=tg|consumer-switching,v|3

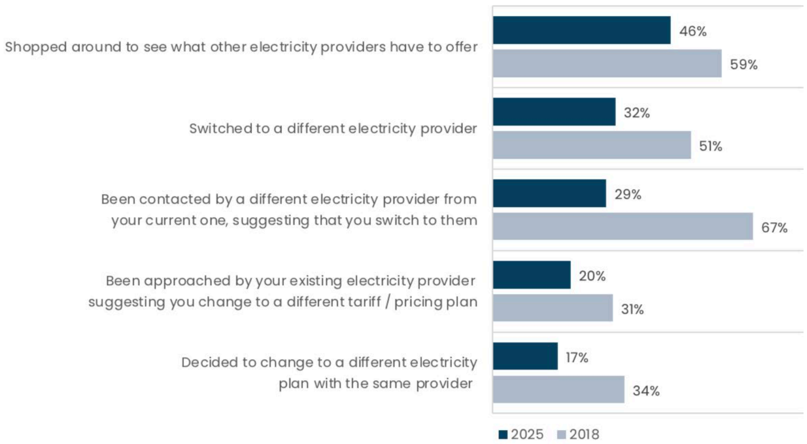
Switching is not the only measure of competition, but it is one of the clearest indicators of whether consumers believe they have meaningful choices.

The switching statistics, alongside other competition and market concentration metrics, suggest consumer engagement problems are affecting the wider market, as well as low-income and vulnerable groups.

Entrust's Auckland household survey tells a similar story.

The Entrust survey shows that shopping around to compare different retailers dropped between 2018 and 2025, mirroring the Authority's switching data,[21] and the intent to switch in the next 3 years dropped from 36% to 32%. Entrust commissioned Insights HQ[22] to survey Auckland residential consumers about electricity issues to help improve awareness of consumer views and concerns.[23] One of the strengths of our surveys is that respondents are randomly selected and representative of the wider population. This means the survey results don't suffer from selection bias. We provided details about why some consumers have not switched in our most recent work priorities and appropriations submission.[24]

Have you ever...?



[21] Only 46% of consumers shopped around to see what other electricity provides have to offer, compared to 59% in 2018. Only 32% switched provider compared to 51% in 2018. The number of consumers contracted by a different provider suggesting that they switch dropped from 67% to just 29%.

2018 sample size = 700 respondents; 2025 sample size = 544 respondents.

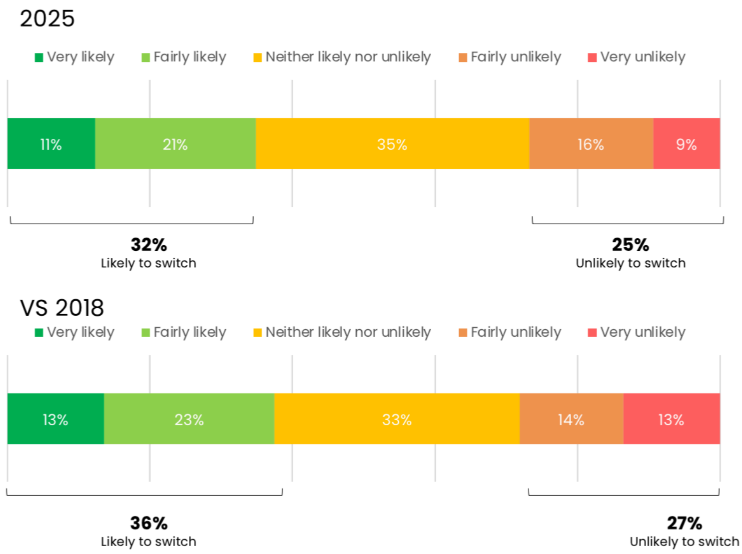
[22] https://insightshq.co.nz/

[23] Insights HQ undertook an online survey among a representative sample of 1,019 Aucklanders from within the Vector catchment area matched and weighted to census based on age and gender. The margin of error on a sample of 1000 is +/- 3%. Where the survey was split into two streams of 500 respondents each, the margin of error is +/-4%.

The survey was conducted from the 16th October to 2nd November 2025.

[24] https://www.entrustnz.co.nz/media/ptyjc4jj/entrust-work-priorities-26-27_15-dec-2025.pdf

How likely are you to switch your electricity provider in the next three years?[25]



These are not small fluctuations. They are a warning sign that competition is weakening where it matters most, in the choices available to households. If consumers are switching off from the market, the answer is not to blame consumers for disengaging, it is to fix the market so it is worth engaging with. They are also reflected in other competition metrics such as the HHI and Concentration Ratios which have stalled or gone backwards.

The steady year-on-year improvements in retail competition metrics the Authority previously relied on as evidence competition is improving are now a distant memory.

These outcomes should raise alarm bells about the state of competition in the electricity industry and whether consumers are getting the full benefits of competition. Competition metrics like switching rates should be expected to improve over time, not go backwards. If there are other potential explanations[26] than the declining state of retail competition then these should be explored and tested to help ensure the Authority has a full picture of the problems and difficulties households and families face in the electricity market.

Barriers to "social retailers" are part of broader competition problems

The Authority's interest in social retailing is welcome. Retail models designed to support social outcomes can help consumers in hardship and have an important role.

The presence of social retailers is presently limited in New Zealand.[27] Two of the three main social retailers, Toast and Nau Mai Ra only provide services in limited parts of New Zealand and only supply about 11,500 customers (0.57% of the residential electricity retail market).[28]

We think it would be useful to explore the role that social retailers play in other jurisdictions and how this compares with New Zealand.

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[25] 2018 sample size = 700 respondents; 2025 sample size = 544 respondents.
[26] For example, the Authority has suggested that evidence "about market share, market exits and changes to switching rates could be … explained by competition in the retail market for a scarce resource." Electricity Authority, Non-discrimination obligations – Code amendment Decision paper, 26 May 2026.
[27] Entrust considers that it is positive Contact, Nau Mai Ra and Toast provide social retail services.
[28] Of the two, only Nau Mai Ra provides services in Auckland with just 2,069 customers in Auckland (0.34% of the Auckland residential market).

Entrust fully supports the Authority investigating the barriers that social retailers face in the New Zealand residential market. If social retailers were able to play a more prominent role this could help address or mitigate the problems that consumers with credit-related issues face by providing more widespread services to disadvantaged consumers nationwide.

The Authority has raised a number of issues that social retailers face, which may limit the extent to which they can offer services to disadvantaged consumers, such as costs of entry, accessing wholesale supply and doing so on "terms that support a sustainable social retailing model". It may well be that some of the barriers social retailers face are unique to their particular business model, but the issues the Authority has raised parallel the barriers all small and independent retailers face and and should be treated as such as part of broader "level playing field" reforms. Competition problems cannot be solved at the margins.

Improving access and engagement will not deliver full benefits unless wider retail and wholesale competition issues are addressed. A critical test is whether the Authority's "level playing field" reforms fix wholesale access problems and reverse poor retail competition trends. Social retailer barriers should be addressed as part of these broader reforms. We doubt the best solution(s) will be social retailer specific.

Recommended actions

Entrust supports the steps the Authority has outlined for going forward with the consumer access review.

We consider that it will be important, as part of the next steps, to quantify the scale of the problems, and the consumer harm, raised in the consultation. There is no need for the Authority to rely on qualitative evidence or subjective judgement about the scale of the problems that need to be tackled.

Entrust recommends that the Authority combine stronger competition measures, better consumer information and switching support, and stronger protections for vulnerable and prepay customers.

1. Prioritise the most disadvantaged members of society

Entrust supports the Authority's intention to further investigate the challenges faced by consumers who may have limited electricity supply options because of credit-related reasons, or who may be forced onto prepay regardless of whether it is suitable for their needs or circumstances.

The Authority has provided some useful information on prepay and post-pay disconnections (as reflected in our submission) and on credit-related declines. It would also be useful to get better data on the number of households and families that face difficulties or limited options for electricity supply. The number of credit-related declines doesn't capture all households that face supply issues.[29]

We also think that it would be useful to quantify how much more households with credit-related issues pay if they are limited to between one and three retailer options (Contact

[29] Some consumers will apply to particular retailers in the knowledge that they will be more likely to be accepted by that retailer. For example, some households may self-select supply from retailers such as Contact (with Prepay), Toast and Nai Mai Ra who are known to supply services to households with credit-related issues and, in doing so, avoid being declined by other retailers.

(Prepay), Toast and Nau Mai Ra) and miss-out on other retailer or supply plans.[30] It would also be useful to get a better understanding of what these financial difficulties translate to in terms of public health evidence, cold homes research etc to get a fuller picture of the problems the Authority is looking at.

2. Investigating metering capability

We see metering capability as an important enabler of consumer choice, innovation, time-varying pricing, flexibility services and broader participation in the electricity market.

We consider the Authority should also investigate whether metering capability, specifically legacy or non-communicating meters, is limiting consumer access to products that could better meet their needs or reduce their costs. Consumer cannot benefit from time-varying pricing, prepay services or other innovative products if the necessary metering capability is unavailable. Any barriers may disproportionally affect households already facing limited choice, so the Authority should assess the scale of the issue and and consider if targeted intervention is warranted.

3. Exploring whether social retailers could have a more prominent role

We think it would be useful to explore the role that social retailers play in other jurisdictions and how this compares with New Zealand.

Entrust also supports the Authority investigating the barriers that social retailers face in the New Zealand residential market. This should include testing the extent to which the barriers are social retailer specific or part of the barriers all small and independent retailers face which are being addressed as part of broader "level playing field" reforms.

4. Adopt a cross-functional approach to consumer welfare issues

Entrust considers that consumer access and choice should be treated as a competition issue, not just a consumer-protection issue. Stronger competition is essential to affordability and meaningful consumer choice.

It could be useful for the Authority to investigate why consumer engagement and switching has been falling, including the drop in residential switching to 5.67%. The Authority can use Entrust's 2025 Auckland household survey, alongside comparable 2018 survey evidence, to better understand affordability, switching awareness and access barriers affecting Auckland households.

5. Address broader consumer engagement issues

Entrust supports the Authority targeting initiatives at low-income, elderly, disadvantaged and other vulnerable consumers, because these groups are more likely to miss out on the benefits of competition and may be paying more than they need to. We consider that there should be an ongoing work programme to monitor and target progress in addressing these issues.

6. Investigate issues specific to prepayment arrangements

Entrust supports the Authority's intention to scrutinise prepayment arrangements more. Prepay can harm vulnerable consumers and currently receives lighter regulatory

[30] This would be a variation of the type of analysis that was undertaken by the Electricity Price Review on "loyalty taxes" and would involve assessing the price they pay because, based on Authority analogous, the consumer may be limited to between 1 and 3 retailers only widely accepting customers with credit issues.

treatment than post-pay. The goal should be to better ensure vulnerable households are not left without power because they cannot afford to pay in advance or run out of credit, and retailers don't force vulnerable consumers onto prepay as a condition of supply, particularly where consumers are vulnerable or disadvantaged.

The Electricity Authority should consider minimum prepay safeguards, suitability checks before households are placed on prepay, and clear limits on forced prepay arrangements, drawing on United Kingdom protections for disadvantaged families.

We have been fully supportive of the Authority's work to mandate Consumer Care Obligations, but there aren't enough safeguards around prepay arrangements.

7. Ongoing monitoring

It could be useful for the Authority to establish an ongoing work programme to monitor and report on consumer engagement issues and the effectiveness of interventions aimed at consumers who are not benefiting from competition, including monitoring of:

- Require retailers to report annually on acceptance rates, prepay transitions, disconnections and pricing outcomes for vulnerable consumers.
- Whether prepay customers are paying more,[31] and the gap between prepay and post-pay disconnection outcomes, including why prepay disconnection rates vary so significantly across retailers.[32]
- Switching data broken down by consumer group, to identify who is missing out most and to build an evidence base for interventions.
- Updates of the Electricity Price Review analysis of savings available to consumers from switching, so the Authority can estimate the scale of extra costs paid by disengaged consumers, including for both: (i) consumers that are paying "loyalty taxes" because they are not switching; and (ii) the extent that some consumers are paying more because they have limited choice of supplier.

Concluding remarks

At the centre of this review are people and households who rely on electricity every day to live safely, comfortably and with dignity, and to participate in society. Entrust wants to ensure electricity is supplied in an efficient and affordable way to all consumers, including our 372,000 beneficiaries in the Trust District of central, east and south Auckland.

Entrust supports the Authority's focus on consumer access and engagement, including retail prepayment plans. Electricity is an essential service, and the market rules and consumer protections should reflect the reality that being without power is not just an inconvenience and can cause real hardship.

A competitive market must make choice visible, usable and beneficial for all households, not only for consumers with the time, confidence, income, digital access and credit history needed to shop around.

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[31] Entrust considers that any claim that prepay is more expensive to supply than post-pay should be required to be supported by verifiable evidence, particularly where higher tariffs or fees are imposed on vulnerable consumers.

[32] The graphics we have included in this submission are examples of some of the monitoring the Authority should undertake. The Authority's EMI website should be updated to include this type of analysis and reporting.

We would like to see the Authority’s work prioritise the households most likely to be left behind, including people experiencing hardship, consumers with limited supply options, prepay customers, elderly consumers, disabled consumers, and those who face literacy, digital access or confidence barriers.

Entrust’s 2025 Auckland household survey, together with the comparable 2018 survey prepared for the Electricity Price Review, provides useful insights into consumer concerns directly relevant to access and choice. That evidence points to affordability pressures, gaps in awareness of price-comparison and switching tools, and the ongoing risk that low-income and vulnerable consumers receive fewer benefits from competition.

The decline in switching also shows that engagement problems now affect consumers more broadly. Switching levels are a useful indicator for the health of competition and one of the clearest indicators of whether consumers believe they have meaningful choices. The Authority will need to address broader retail and wholesale competition issues if consumers are to access supply, switch retailers and participate fully in the electricity market.

The Electricity Authority should make the care and conduct around disadvantaged households the benchmark for reform. If the electricity market can deliver practical, usable and affordable choice for consumers facing hardship, limited supply options, prepay dependence, disability, age-related barriers, digital exclusion or are otherwise vulnerable, it will be stronger for everyone.

Kind Regards

Alastair Bell
Chair of Regulation and Policy Committee