

Consumer NZ

These are transcribed notes from a verbal submission from Consumer NZ.

Overall, we are in support of the proposal. Obviously some practicalities need to be sorted out but overall good for consumers.

2BC

We are concerned that TOU isn't suitable for all households. Suitability varies by appliances available to households (access to smart appliances, use of gas). Danger of overpromising.

Some households may not have the motivation or ability to shift. Such as habits, children etc. It will require whole household buy-in.

We have a concern that the benefits of time of use will be overstated for some households. Studies show that benefits through load shifting will be household specific according to the means and motivation of each household to move electrical load away from higher cost periods. Retailers will need to be cautious in putting households onto the right plan, else some households could end up paying more

Consumer NZ is working on a tool to show whether TOU will work for them. Release expected later this year.

Consistency of approach required from retailers to encourage uptake. Many retailers use different terms for peak and off-peak, and have different times.

TOU should be defined. We prefer "time-conditional".

Free hour of power would suit some households, particularly those with fast EV charging etc. Likely some kind of tool will be required.

Perhaps a simplified "traffic light" style system to show potential for savings.

Will get easier over time as more smart appliances. It will be easier to once the timing is outsourced to the retailer.

Agree that solar buyback should align with the value to the system. Might change as solar penetration increases.