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Sent: Thursday, 2 April 2026 6:06 pm
To: Distribution Pricing <Distribution.Pricing@ea.govt.nz>
Subject: personal submission

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Dear colleagues,

Thank you for inviting comments on the proposed “Distributed generation pricing principles reform”

I am commenting only on the impact on the individual household, not commercial generators.

From the household perspective, I very strongly oppose these changes.

The key background points are:

1. When solar is exported in Auckland, for practical purposes it is consumed in Auckland.
2. Thus local solar in large urban areas must considerably *_reduce_* the need for investment in lines
3. If we had Australian levels of roof top solar we would not have needed anything like the investment in networks to bring power from the south island upto Auckland. Plausibly none of it would have been needed; regardless of the exact figure, it would be much less.
4. Despite this the power companies have already acted to severely penalise those of us with home solar by increasing line charges considerably. This includes both deliberately withdrawing the low user bracket, and net increases in the line charges well above inflation.
5. This has the perverse impact that the lowest users of local transmission now pay the highest rates per kW by a considerable margin
6. At least one company outside of Auckland has introduced a specific penalty charge for people with solar.

It is clear from this pattern that the transmission and power companies are extremely unhappy that their revenue from solar customers has fallen and are acting to claw it back. I do not trust them at all to fairly allocate the actual costs of providing local transmission for solar households.

More, with the deepest respect, I am highly sceptical that your oversight will ever rectify their intense bias, since you have approved all the inappropriate penal increases to date.

Finally, it might be argued that the provision to pay more for solar exported at peak times will help improve the payback for solar. This is self-evidently wrong. In most cases peak electricity consumption is outside the peak of solar. This is well known and widely referred to as the Duck curve. Thus, any increase in solar export rates will be trivial and limited to a short window in time.

In my family's case, we have a battery, so that we consume our own power at peak times, and do not export. It would require an improbable differential to justify using our battery to export power at these times. I cannot see it ever being the case. Thus, this is a well intentioned nullity, of no real world impact.

In summary, the changes in line charges to date have severely penalised household solar, to the point that the financial case is now extremely dubious and there is no realistic chance of any trade off in better rates for exported power.

I call on you to abandon these damaging proposals and bring back the lower user rates before it is too late.

Yours Sincerely,

Professor Alistair Gunn