

Rewiring Aotearoa submission on Improving electricity billing in New Zealand

Our feedback primarily relates to the need to expand the information being presented to consumers to include a rough idea of how they could benefit from solar and/or batteries. Provision of this information is strongly in the interest of consumers.

About Rewiring Aotearoa

Rewiring Aotearoa is an independent non-partisan non-profit funded by New Zealand philanthropy. It is a registered charity working on energy, climate, and electrification research, advocacy, and supporting communities through the energy transition. The team consists of New Zealand energy, policy, and community outreach experts who have demonstrated experience both locally and internationally. We're always fighting for the New Zealanders who use the energy system, and our goal is to help build a low cost, low emissions, high resilience electrified economy for Aotearoa NZ.

What is needed

We strongly support the need for clear and comparable information being provided to electricity customers. This should extend to buy-back rates for electricity exported to the grid.

Clarifying exports terminology

- Proposed tier two (3.20(b) x.) reads: "Any exports - from solar or other generation".

Suggestion: This should be clarified to include exports from solar, other generation, or storage (such as V2G, battery storage etc).

Expanding the definition of materially better outcomes

- Definition of materially better outcome (3.30): The consultation document states that "A materially better outcome may also include matters such as a better fit with the customer's usage pattern or circumstances (such as suitability for time-of-use tariffs, payment preferences or any discounts), or more even payments across the year (for consumers who prefer bill-smoothing)."

Suggestion: Options for better plans/outcomes should also include:

- a. better rates for exports, based on usage and export patterns / circumstances.
- b. insights on what the electricity bill could be, if the person had the average sized solar install on their property.

Proposal on how to maximise export benefits

- The Authority proposes working with key stakeholders to provide more publicly available guidance on how consumers can maximise savings from a time-of-use plan by shifting their use to off-peak periods (3.52).

Suggestion: Guidance on how to shift consumption should also include guidance on how to change their exporting behaviour to maximise their benefits of exports to the grid.

Responses to specific questions

Question Q4. Content requirements – Do you have any additions or removals to the proposed tier one and tier two content lists?

- Proposed tier two (3.20(b) x.) reads: “Any exports - from solar or other generation”.

Suggestion: This should be clarified to include exports from solar, other generation, or storage (such as v2G, battery storage etc). This is important as electricity may be exported to the grid from storage, not just from generation.

Question Q14. Do you agree with the proposed wording of the prompt?

- We agree with the wording, but also suggest this should also indicate the significant savings that customers could make by investing in solar panels (this can be in a generalised way, and not linked to specific analysis of a property).

Suggestion: Add the underlined text into the prompt: “*Could you save money on another plan, or by installing solar panels? Compare plans...*”

3.68. Require retailers to prominently display a tier one message across all billing information, including bills, emails, apps and websites:

“Could you save money on another plan? Compare plans at the independent and government-funded site [TBC].org.nz.

The Electricity Authority requires us to include this information”

3.69. Require retailers to include the site’s logo and a hot link with this message.

Question Q16. Do you agree that each retailer should be required to maintain a catalogue to allow customers to compare their full range of plans and costs?

- We agree that retailers should provide this information, but the information should also include reference to export rates and conditions.

Suggestion: Retailers should be required to provide full information about their rates and conditions for electricity exported to the grid, including any limits or conditions.

Question Q18. Do you agree that the annual check-in should also include telling customers about the retailer's channels for comparing and accessing better plans?

- Yes, but this should also refer to the option customers have of reducing their costs by installing solar.

Suggestion: This should also refer to the option of installing solar as a way to reduce electricity costs.