
Further reform – cross-submission

From Richard Cookson <[REDACTED]>
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To Distribution Pricing <Distribution.Pricing@ea.govt.nz>

Good afternoon, please see below LPC's cross-submission commentary.

LPC supports distribution pricing arrangements that are transparent, predictable and cost-reflective, enabling accurate future capital and operating budgeting. As a large industrial electricity consumer pursuing significant electrification programmes, LPC is concerned that access seekers, face substantial information asymmetry when making long-term investment decisions.

Large consumers are expected to commit significant capital based on future electricity availability and connection pricing, yet often have limited visibility of network capacity constraints, future development plans, utilisation assumptions, and the methodologies used to allocate network costs.

LPC considers that distribution pricing reform should focus on:

- improving transparency of pricing methodologies and network development planning;
- reducing first-mover disadvantage where customers trigger investments that benefit future users;
- ensuring network development costs are allocated equitably between direct beneficiaries and wider network users;
- providing greater visibility of future capacity availability and investment requirements;
- supporting nationally significant electrification and decarbonisation projects;
- increased regulator engagement with large energy consumers;
- ensuring large customers have access to transparent, auditable pricing and effective dispute resolution mechanisms.

The objective should not simply be the efficient allocation of costs, but the creation of a pricing framework that enables informed energy consumer investment decisions, encourages electrification aligned with reducing consumer energy costs, and supports New Zealand's long-term economic and NetZero 2050 environmental objectives.

Kind regards

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