

Submitter: Mark Robinson

Q1. Do you agree the issues identified by the Authority are worthy of attention? If not, why not?	Yes, these issues are worthy of significant attention. It is shocking that aggregated data is used so much in the reconciliation and billing process when smart meters are prevalent.
Q2. Which option do you consider best addresses the issues and promotes the Authority's main objective? Are there other options we have not considered?	Time-varying plans should be the default option for any consumers with smart meters. Data on historical half-hourly consumption aggregated into the time-of-use periods must be available to consumers and retailers in a standard format and the retailer must provide the cost estimate based on that historical consumption data.
Q3. Should we require retailers to offer a price plan with time-varying prices for both consumption and injection? Why or why not?	Yes, for time-varying prices for consumption. No, for injection since this is a small part of the market. Sharing of benefits (rebate) could be done as per the proposal in 2A where relevant.
Q4. Do you have any feedback on the design requirements?	It is good to not have standard periods for all retailers to reduce herd mentality behaviour.
Q5. Is there a risk that injection rebates will not be passed through to the consumers targeted? If so, how could we safeguard against this risk?	Yes, this is a risk. This could be addressed by transparency of how these benefits are calculated with this being made publicly available.
Q6. Which retailers should be captured by the proposal and why?	Good to target large retailers initially, but smaller retailers should be included after a period of say 1 year.
Q7. What are your views on the proposed timeframe for implementation of 1 January 2026? Would 1 April 2026 be preferable, and if so why?	
Q8. What are your views on Part 2 of our proposal that would require retailers to promote the time-varying price plans?	They should be the default option with pricing provided based on historical consumption.
Q9. What should the Authority consider when establishing the approach to and format of the reporting regime?	
Q10. Should the Authority include a sunset provision in the Code, or a review provision? Why?	A sunset clause should not be to phase out the plan, but for review and a decision based on the review outcome.

Q11. What are your overall views on Part 3 of the proposal?	
Q12. What are your views on Part 4 of our proposal to amend the Code to require that consumers are assigned to time-varying distribution charges, that retailers provide halfhourly data to distributors for settlement, and that distributors must use this information?	This is the most critical part of the proposal. Where smart meter data is available, it must be used for reconciliation and billing with distribution generation costs also based on this data.
Q13. Do you agree with the objective of the proposed amendment? If not, why not?	Yes
Q14. Do you agree the benefits of the proposed amendment outweigh its costs?	Yes
Q14. Do you agree the benefits of the proposed amendment outweigh its costs?	Yes
Q15. Do you agree the proposed amendment is preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objectives in section 15 of the Electricity Industry Act 2010.	Yes