

Kia ora,

I am thrilled about the opportunity to better empower consumers who are fundamentally transforming our energy future. Although these proposals represent progress, essential changes will enable individuals to make choices that help Aotearoa New Zealand develop the most cost-effective and resilient energy system. The changes need to address the fundamental problems:

- A missing distribution price signal for injection
- Current injection plans tend to offer fixed rates only
- Low awareness of the benefits of time-varying price plans

Large retailers should offer Time-of-use plans as this empowers consumers to take better control of their impact on the electricity system and their own bills (2B). I found an early example valuable for EV charging. I would like to get access to more refined schemes, comparable to developed energy markets in Europe.

However, I do not agree that the Task Force's proposed solutions for 2A and 2C will address the problems sufficiently. I agree with the addition of a new rule to "make sure power companies pay people who sell power to the network" (2C) but this rule needs to be explicitly extended beyond just "peak times" and into: (i) dry years and other extended periods of extra constrained supply; and (ii) for all times, reflect the contribution of this power contribution to general supply and the role the energy is playing to reduce need for new generation assets, rather than just on the market value at peak times.

I agree that retailers should be required to pass through benefits to consumers from distributors paying a rebate for supply at peak times. I support the addition of a requirement in the Code for distributors to pay a rebate when consumers supply electricity at peak times (2A). While I strongly support the objective of the proposed amendment, I do not support the proposed solution of principles-based rebates. NZ has a poor track record of disciplining its oligopolists by vague principles-based regulations. The chance of them being twisted and ignored is far too high.

Instead, I support the alternative option of consumption-linked injection tariffs (with adequate safety valves to ensure too much power does not flow back in). This would fairly apply similar pricing to both consumption and injection during peak times. I

support this being a perfectly symmetrical export tariff, and not differential as suggested. This would also strongly encourage distributors to improve their consumption tariffs. As a consumer, a symmetrical tariff is far easier to understand and a fairer way to price electricity, where my electricity is treated just as valuable as an energy company's energy export or reduction.

These rebates should be apply to larger consumers and generators as well as mass-market consumers, as ensuring all are appropriately incentivised will lead to the lowest-cost possible distribution system for all consumers in the long-term.

A strong monitoring and reporting regime to ensure compliance and provide valuable insights is critical across all changes. Complementary Code changes should be undertaken to ease the process of solar and battery installation and upgrades for consumers, and enable them to maximise the size of their contribution to the system.

Best regards,

Zdenek Kudrna