

Appendix B Format for submissions

Submitter	
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Questions	Comments
Q1. Do you agree the issues identified by the Authority are worthy of attention? If not, why not?	Yes
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?	The proposed option is the best. The only thing missing is addressing communication of tariffs to the customer. Some individuals and indeed some aggregators/load flexibility providers may prefer an API where current price is given, rather than fixed prices in a PDF contract/website/app. This also makes smart devices much easier to utilise. Its similar to ripple control where a start/stop signal is given, here with an API one number (price) is given and devices can decide on when to operate. This is done by Flick currently, but Octopus too: https://developer.octopus.energy/rest/guides/endpoints
Q3. Should we require retailers to offer a price plan with time-varying prices for both consumption and injection? Why or why not?	Yes
Q4. Do you have any feedback on the design requirements?	No
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?	Unsure. Potentially making these visible for customers? See vectors pricing: https://www.vector.co.nz/personal/electricity/about-our-network/pricing If customers are aware of their injection rate and its itemised on any invoices then they can avoid issues?
Q6. Which retailers should be captured by the proposal and why?	Happy with this, Allows smaller players to avoid excessive costs while gaining market share.
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?	Even earlier would be better. I suspect some will complain about upgrading IT systems but they are among the most profitable companies in New Zealand. There is no excuse.
Q8. What are your views on Part 2 of our proposal that would require retailers to promote the timevarying price plans?	Completely agree with this not being the default to avoid shocks for customers. This needs to be implemented with a revamped powerswitch website, as currently it is not fit for purpose.
Q9. What should the Authority consider when establishing the approach to and format of the reporting regime?	N/A

Q10. Should the Authority include a sunset provision in the Code, or a review provision? Why?	I think review in 5 years?
Q11. What are your overall views on Part 3 of the proposal?	Good
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 half-hourly data to distributors for settlement	Agreed, a necessary change.

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Questions	Comments
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?	Absolutely
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

