

Date: 23.03.2026

Re: Response to joint letter to distributors on NNS

To Whom It May Concern,

We support the initiative of the EA, EECA and ComCom in writing to distributors and the industry.

Revolve Energy is a specialist advisor, working on behalf of building owners and investors in PV, Flex & BESS. We work with our clients from the start to end of a project to install and operate PV/BESS/Flex, including strategy/feasibility/business cases, design, procurement, construction & operation. As a result, we are aware of the motivations and challenges of those that are looking to implement non-network alternatives to supply their properties.

We encourage you to consider this topic from the perspective of the customer. In this case we consider the customer to be the electricity consumer who is looking to implement non-network alternatives to the supply of their property. The motivation of these customers is generally to reduce their energy costs, provide greater price certainty into the future, and increase resilience.

To date our experience is that the process and tariffs of distributors and the traditional electricity supply industry create several barriers to customers investing in non-network alternatives. Below are our suggestions of actions that could be taken to remove the barriers.

1. Provide information to support investment decisions. Those that are considering investing in flex or a BESS need good information to inform their business case. We have found this has been challenging to obtain from distributors.

- / Provide an automated, low cost/free and instant process for obtaining historic half hour meter data for an ICP. The current process is not fit for purpose, is manual, expensive, and too slow.
- / When a new site is considering connecting to a distribution business, the customer needs to understand two or more connection scenarios to be able to make an informed decision as to whether they should invest to reduce their peak demand. Require distributors to provide the following:
 - + The capital cost for two connection sizes nominated by the customer. E.g. 1) with no flex/BESS demand reduction technology, 2) a smaller connection size



where Flex/BESS has been implemented to reduce peak demand. This information is critical to inform the cost saving the flex/BESS investment can realise.

- + The available connection capacity at the location. This will allow the customer to assess if that capacity + investment in Flex/BESS/energy efficiency could be sufficient to supply the site without the need for upgrades such as a new transformer.

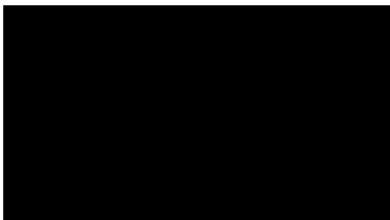
2. Provide tariffs or flex payments that provide investor certainty. Most capital investments will rely on either a significant cash investment, or ongoing repayments of debit. Tariffs or flex payments must provide certainty to the investor that the saving or revenue will exist to recoup their investment, and make a fair return. Typical this would be certainty over a period of 10 years. Examples of suitable tariffs or flex payments might be:

- / Guidance on how capacity, demand and CPD charges are likely to change over say a 5-10 year period.
- / Flex payments that are guaranteed for a period of 10 years (not 1-2 as we often see offered).

3. Provide ongoing data in an automated format that will allow Flex/BESS control to be autonomous. It is discussed that distributors should assume flex/BESS is automatically controlled. For this to be the case the algorithm that controls it must have access to the correct tariff information. Data should be provided via an API, and updated automatically when the tariff on an ICP changes.

We are supportive of the initiatives that are suggested in the letter. However we have the following comments:

- / These issues have been discussed for 5 years, including in forums such as Flexform. They are known, but little progress appears to have been made.
- / The regulators need to step in and provide timelines for these actions to be taken, and define standards & requirements clearly. The industry does not have a track record of change at speed, and consistency.
- / The success of non-network alternatives could be seen as direct competition to distributors. Further reason why regulation may be required.



Director