

16 March 2023

Dr Nicola Crauford  
Chair  
Electricity Authority Te Mana Hiko  
By email: [policyconsult@ea.govt.nz](mailto:policyconsult@ea.govt.nz)

Dear Dr Crauford,

**RE: Consultation Paper - Review of the Consultation and Feedback Processes**

SwitchDin welcomes the opportunity to provide feedback to the Electricity Authority's Consultation Paper on the review of the consultation and feedback processes.

SwitchDin is an energy software company that bridges the gap between energy companies, equipment manufacturers and energy end users to integrate and manage energy resources on the grid. SwitchDin's technology enables our clients to build and operate vendor-agnostic virtual power plants (VPPs) and microgrids, and to optimize site performance across fleets of diverse assets. Founded in 2014 in Australia, SwitchDin is currently in the process of expanding our presence in Aotearoa by building on existing and new partnerships with energy retailers, electricity distribution businesses (EDBs), solar retailers and system integrators, so that we can leverage our experience to support the imminent New Zealand energy transformation.

SwitchDin is an active contributor to policy processes in Australia and we would appreciate the opportunity to contribute to the development of New Zealand policy. We strongly prefer the working group model for consultation over the model of a committee that co-opts representatives. We believe the Authority's processes would benefit from participation by distributed energy resources (DER) participants. Option 3 is SwitchDin's most preferred option and Option 1 is our least preferred.

SwitchDin would be keen to participate in the Authority's working groups, should it adopt that model of consultation. Please add SwitchDin staff, Darren Gladman ([darren.gladman@switchdin.com](mailto:darren.gladman@switchdin.com)) and Josh McLaren ([josh.mclaren@switchdin.com](mailto:josh.mclaren@switchdin.com)) to the invitation list for workshops and working groups, as you see appropriate.

Thank you for the opportunity to respond to these important issues. I remain available for further discussions and inputs.

Best regards,

Darren Gladman  
Head of Policy & Regulatory Affairs

## Format for submissions

Submitter	SwitchDin
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Question	Comment
Q1 For your preferred option, do you prefer Option 1, Option 2, or Option 3?	<p>The working group model is preferred to the co-option model. On that basis, SwitchDin prefers Options 2 and 3 over Option 1.</p> <p>Distributed energy resources (DER) participants should be included. Only Option 3 includes DER participants. On that basis, SwitchDin prefers Option 3 over Options 1 and 2.</p>
Q2 Are there any key stakeholders that have been left out of these preferred options?	<p>DER participants have been left out of Options 1 and 2.</p> <p>Technology providers have been left out, except in Option 3, which includes “one or two members representing the interests of metering equipment providers”. However, there is more to DER technology than metering. DER technology providers should also be included in consultation processes.</p>
Q3 Do you have any comments on the proposed membership?	<p>The DER sector is diverse and its sub-sectors include:</p> <ul style="list-style-type: none"> <li>● DER installers</li> <li>● DER retailers</li> <li>● Aggregators and flexibility traders</li> <li>● Technology solutions providers</li> <li>● Original equipment manufacturers (OEMs)</li> <li>● Industry service providers and others</li> </ul> <p>Working groups should be used to ensure that these sub-sectors are all able to contribute to policy development through the Authority’s consultation processes.</p>
Q4 Do you have an alternative suggestion? If so, please provide details.	<p>SwitchDin supports Option 3, and urges that working groups be used to ensure there are opportunities for all sub-sectors of the DER sector to participate meaningfully in the policy development process.</p>