

15 August 2023



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Targeted Reform of Distribution Pricing – Submission by MainPower New Zealand Limited.

MainPower New Zealand Limited (MainPower) thanks the Authority for the opportunity to make this submission.

Nothing in MainPower's submission is considered to be sensitive and the whole submission can be published.

MainPower wishes to provide the following general commentary on the consultation:

- The ability of MainPower to send effective price signals to consumers is hampered by having limited control over the price presented to end consumers. MainPower recommends the Authority considers promoting mechanisms to the industry that will encourage efficient retailer pass through.
- MainPower believes the Authority should also consider improving industry wide data transfer architecture as the current data transfer mechanism results in considerable rework and inefficiencies for participants.
- MainPower supports the submission of the Electricity Networks Association and the recommendation that the Authority provide more detailed guidance on how individual EDB's pricing should be reformed.
- MainPower agrees with the Authority that efficient distribution pricing can aid in providing appropriate pricing signals to consumers, however MainPower is unconvinced that the interventions proposed by the Authority will efficiently benefit consumers or support an affordable transition to a low-emission economy.

MainPower believes its incumbent on the Authority to advise how the regulatory interventions will support efficiency given additional costs of intervention will ultimately fall on the consumer when the benefits are unqualified.

- MainPower would expect that the Control and Call-in options proposed by the Authority would only be enacted following a process of clear guidance, review and non-performance by EDB's.

Please do not hesitate to contact Sarah Barnes at this office should you have any questions.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Sarah Barnes', written in a cursive style.

Sarah Barnes
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