

31 August 2023

Electricity Authority Te Mana Hiko
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Tēnā koutou

CROSS SUBMISSION ON ISSUES PAPER: TARGETED REFORM ON DISTRIBUTION PRICING

Unison Network Limited (**Unison**) is an electricity distribution business (**EDB**) operating in Hawke's Bay, Taupō and Rotorua. Centralines Limited (**Centralines**) is an EDB operating in Central Hawke's Bay. This follows Unison and Centralines short substantive submission on the Issues Paper.

The purpose of this cross submission is to confirm support to some of the positions of submitters, as described in their 15 August 2023 submissions. The detail is not repeated, but references provided to the relevant section of their submission. Unison and Centralines provide high-level comment on the topic.

Submitter	We support
Cost-reflective pricing	
Aurora	Paragraphs 5 and 6
ENA	Paragraph 1 Executive Summary
Northpower and Top Energy	Paragraph 11
Unison and Centralines	The level of change that has occurred in distribution pricing is positive although we acknowledge that there is urgency to encourage an increased emphasis.
Peak period price signals	
EA Networks	Reply to Q3A
ENA	Reply to Q3A
Northpower & Top Energy	Paragraph 34
Powerco	Reply to Q3A
Consumer Advocacy Council	Paragraphs 6.1 and 6.2
Vector	Paragraph 66
Unison	<ul style="list-style-type: none"> The use of peak price signals should be considered in combination with other options and will deliver progressively reduced response as fixed charges increase. The potential for sharp differential between peak and off-peak rates could result in shifted peaks, and increased price risk for households in energy hardship.
Off-peak price signals	
Powerco	Reply to Q9
Orion	Reply to Q10

The Lines Company	Reply to Q11
Unison	Moving to zero or close to zero off-peak prices will be desirable and achievable once the transition from LFC regulations is complete.
Target Revenue Allocation	
Aurora	Reply to Q14 and Q15
WEL Networks	Reply to Q14
Unison	<ul style="list-style-type: none"> Any change to revenue allocation methodology will result in potentially significant price shocks for consumers. Change will need to be gradual and relatively permanent. The underlying reasons for change will need to be robust and not politically motivated.
Connection pricing	
EA Network	Reply to Q19
Wellington Electricity	Reply to Q19
WEL Networks	Reply to Q19 and Q20
Unison	<ul style="list-style-type: none"> Connection pricing needs to be considered in coordination with many contributing factors, some of which are specific to the relevant network. The contribution pricing policy requires a degree of consistency in order to maintain fairness for current and new connectors.

Ngā mihi

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