

29 FEBRUARY 2024

ECOBULB[®]

**SUBMISSION ON ELECTRICITY AUTHORITY CONSULTATION:
IMPROVING RETAIL MARKET MONITORING : CLAUSE 2.16 INFORMATION
NOTICE**

1. ABOUT ECOBULB LIMITED

The following document provides Ecobulb's written submission to the Electricity Authority's 5 December 2023 consultation on "*Improving retail market monitoring : clause 2.16 information notice*".

Section 1 of this submission provides background about Ecobulb, while Section 2 is our response to questions in Appendix B of the Consultation Paper.

Ecobulb Limited (formerly Energy Mad) is a 100% owned Christchurch company.

We have a goal to "*Save enough electricity to power New Zealand for one year*".

We are experts in designing, developing and delivering New Zealand regional and nationwide residential energy assessment and lighting projects.

We have a highly successful history and proven track record from delivering 107 large Ecobulb and energy efficiency projects with Governments, Energy Trusts, Lines Companies and Electricity Retailers, in New Zealand, Australia, the United States and Germany since 2004.

With approximately 25 Million "*Ecobulb*" energy saving light bulbs installed in an estimated 3.4 million New Zealand, Australian and United States homes, and having completed energy assessments in 42,200 New Zealand homes, Ecobulb is 64% of the way to achieving our goal.

These Ecobulbs are saving an estimated \$6.0 billion electricity and 19 million tonnes of carbon dioxide emission reductions over their lifetimes.

In addition, since April 2021, we have delivered multiple (Northland, north and west Auckland, the King Country, Whanganui, Christchurch and Ashburton) Home Energy Saver Programmes involving:

1. Ecobulb's world first innovative "*Power\$aver*" software platform for delivering in-home and on-line energy assessments.
2. Funding from Energy Trusts, Lines Companies, City Councils, MBIE's Support for Energy Education in Communities Programme, and EECA.
3. 83 locally employed energy assessors undertaking in-home one-on-one free, personalised "*energy assessments*" to make these homes more energy efficient, help them find the **lowest cost electricity retail plan using an automated Powerswitch assessment**, and supply them (free Ecobulb LEDs, energy efficient showerheads and other low-cost energy saving measures).
4. **10,035 free home energy** assessments completed, saving **\$6.8 million electricity per year**.

We calculate rolling Power\$aver out to 1.5 million NZ homes would deliver:

1. \$1.0 billion annual cost of living reduction for kiwis through the power bill savings.
2. A 340MW (Hamilton's worth) of peak load reduction.
3. Carbon dioxide emission reductions equal to taking all cars off NZ roads for a year.
4. A ridiculously good "*bang for buck*" 18 : 1 benefit to cost ratio for NZ Inc.

2. RESPONSE QUESTIONS IN APPENDIX B OF THE CONSULTATION PAPER

Q1. What are your views on the Authority's description of the current issues with its monitoring of the retail market? Are there any additional issues we have not included?

We agree with the Authority's description of the current issues with its monitoring of the retail market.

Q2. The Authority is proposing that retail market monitoring should be through one consolidated, mandatory request, collected on a consistent basis, that is proactively published, costeffective, and fills identified information gaps. What are your thoughts on this proposal?

We agree with the Authority's proposal.

Q3. What are your views on the Authority's proposal that a new Clause 2.16 notice is the correct tool to improve retail market monitoring?

We agree with the Authority's proposal.

Q4. What are your views on the ICPs the proposed notice applies to, and do you believe the proposed notice should apply to any other group of ICPs?

We don't have an opinion on this.

Q7. Do you have any feedback on the proposed notice (Appendix A)?

We don't have the required expertise to provide informed feedback on the proposed notice.

Q9. What are your views on how the information requested in the proposed notice would meet the Authority's statutory monitoring of competition, reliability, and efficiency in the retail market, and domestic and small business consumers' outcomes? What information do you think is needed to meet the Authority's statutory monitoring requirements?

We don't have the required expertise to provide informed feedback on the proposed notice.

Q10. Do you believe the benefits of the Authority having this information outweigh the costs? If not, why?

Yes, we believe the benefits of the Authority having this information outweigh the costs.

Q14. What are your views on the information the Authority intends to initially publish from the proposed notice, including the proposed level of detail?

We don't have the required expertise to provide informed feedback regarding this.

Q15. What information do you believe the Authority should or should not publish? What level of detail do you consider appropriate for publication, and why?

We don't have the required expertise to provide informed feedback regarding this.

Q17. What are your views on the privacy implications of this clause 2.16 notice and the methods we have outlined to manage these?

We don't have the required expertise to provide informed feedback regarding this.