Thanks for the opportunity to make a submission.

I write as a domestic consumer with a 3-phase supply and a solar/battery system.

The "Table 2 Electricity Rate and Consumption" section in the consultation paper makes allowance for import and export over different TOU tariff periods. However there is a use case unique to multi-phase solar installations where both import and export can take place in parallel across different phases. This is often done to minimise net grid draw at peak times when tariffs are high.

The nature of the data supplied by metering companies and how that flows to the costs incurred by retailers from lines companies, and the way retailers bill consumers, does not fairly compensate consumers who are providing an overall beneficial service to NZ's electricity supply.

My submission is that data requested from retailers include this use case so this beneficial behaviour can be measured, and ultimately fairly compensated.

Regards - Steve

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