I have been interested in solar power since living in the US in the late 1970s when President Carter installed solar panels on the White House.

Three weeks ago I paid a 50% deposit on a grid-connected rooftop solar system (7+kW of panels, 6kW inverter, 11kW BYD battery).

I was pretty keen to do this several years ago, but then Labour introduced its phase out of low user tariffs and I couldn't help but see that as an attack on home solar. Of course, the electricity industry dressed it up as an equity issue, in which guise the govt swallowed it verbatim. High lines charges (otherwise known as daily fixed charges) are a major disincentive for home solar because they still have to be paid no matter that you generate much of your own power.

Despite the fact that that vast increase in revenue is still working its way into the coffers of gentailers and distribution companies, annually increasing fixed daily charges are rarely mentioned today, but there is a lot of talk about further hefty price increases being necessary.

I **agree with the stated aim** of providing consumers with more options, and that flexible distribution generation can help drive down costs for everyone into the future.

I also **agree with the high-level problems** identified:

- A missing distribution price signal for injection
- Current injection plans tend to offer fixed rates only
- Low awareness of benefits of time-varying price plans.

I've enquired from my supplier, Powershop, about time of use charging but got a pretty dismissive response, although I have a smart meter.

I **agree** with the proposal to **require large retailers to offer Time of Use plans** as this empowers consumers to take better control of their impact on the electricity system and their own bills (2B).

However, I do not agree that the Task Force's proposed solutions for 2A and 2C will address the problems and achieve what is required.

I strongly agree with the addition of a new rule to "make sure power companies pay people who sell power to the network" (2C) but the rule needs to to be **explicitly**

extended beyond just "peak times." Such payment should reflect the value of this power contribution to general supply and the role the energy is playing to reduce need for new generation assets, rather than just on the market value at peak times.

I agree that retailers should **be required to pass through benefits to consumers** from distributors paying a rebate for supply at peak times.

I support the addition of a requirement in the Code for distributors to pay a rebate when consumers supply electricity at peak times (2A). While I strongly support the objective of the proposed amendment, I do not support the proposed solution of principles-based rebates.

Principles-based rebates would likely provide too much flexibility, be difficult to monitor and enforce, and not achieve the desired result. The benefits of this proposed solution are unlikely to outweigh the costs.

Instead, I **support the alternative option of consumption-linked injection tariffs**. This would fairly apply similar pricing to both consumption and injection during peak times. I support this being a perfectly symmetrical export tariff, and not differentiated as suggested. This would also strongly encourage distributors to improve their consumption tariffs. As a consumer, a symmetrical tariff is far easier to understand, and a fairer way to price electricity, where my electricity is treated just as valuable as an energy company's energy.

These rebates should be applied to larger consumers and generators as well as mass-market consumers, since ensuring all are appropriately incentivised will lead to the lowest-cost possible distribution system for all consumers in the long-term.

A strong monitoring and reporting regime may be needed to ensure compliance and provide valuable insights across all changes. Complementary Code changes should be undertaken to ease the process of solar and battery installation and upgrades for consumers, and enable them to maximise the size of their contribution to the system.

The key thing about home solar (or wind or hydro) is that a consumer is paying for their own electricity generating plant. This saves generators that cost. Home generators should be adequately rewarded and encouraged.

Let me return to present charges and fixed daily charges as they are a major disincentive for home generation. It was a recent email from Powershop saying that our charges would rise by ~$28 per month that pushed me over the top into buying solar. It represents about a 15% increase in power charges. Maybe God is putting up the price of rain, wind and sunlight!

So I understood that daily fixed charges were rising for low uses such as ourselves, and they are, on April1 from 138c to 172.5c . As I understood the changes, **low user** charges were to be phased out over 5 years so that everyone would be paying the same daily

fixed charge, and that amount might be something like 280c a day. But according to the data you can find in the tables below, **standard user daily fixed charges** for Powershop customers are rising from 287.7 cents a day to a whopping 348.3 cents a day!

Now, when Megan Woods repealed the low user charging regime, it wasn't much mentioned but standard users got all their power at about a 10 cents/unit discount compared with low users, however, they had to pay ~300 cents for their fixed daily charge. From 1 April, they are paying a much higher fixed daily charge and only getting a 3–4 cent / unit discount. This seems odd.

Perhaps home power generators could get reductions in fixed daily charges from lines companies. Their drawdown usage of those lines should be much reduced although they will be feeding power back into them. However do the major generators pay lines charges for feeding power into the system?

https://www.powershop.co.nz/public/Ratecards/2025/37-East-Otago.pdf

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Yours faithfully,

Warren Judd