My name is Helen Charters, and I'm a retired Academic from Waiheke Island, Auckland. I am excited by the idea of empowering consumers to fundamentally reshape our energy future. While these proposals are a step in the right direction, key changes will ensure individuals make decisions that lead to Aotearoa New Zealand building out the cheapest yet most resilient energy system possible.

Like a microcosm of Aotearoa NZ, Waiheke has a rapidly expanding population, an increasing number of electric bikes buses and cars, a house building boom, plenty of exposure to sunlight and growing issues with water- supply and electricity. I would love to see systems that encourage the installation of solar generators in all new builds - no matter how big or small, the storage and sharing of solar- generated power at a local level, and the avoidance of additional expensive infrastructure - in our case an undersea cable that would disturb the struggling marine environment of the Hauraki Gulf. The more solar we can generate, the less we need rely on hydro, which is in increasingly short supply due to dairy-farming in dryer regions and climate change/ desertification.

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 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).

As I am retired, I can easily be flexible with the timing of activities that use power so as to take advantage of off peak rates. This is true of a large proportion of our population. It would be even more effective if large industries did this.

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 agree with the addition of a new rule to "make sure power companies pay people who sell power to the network" (2C) and but that to do this the rule needs to to be explicitly extended beyond just "peak times" and into:

Dry years and other extended periods of extra constrained supply

For all times, reflect the contribution 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 (with adequate safety valves to ensure too much power does not flow back in). 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 differential 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 more fair way to price electricity, where my electricity is treated just as valuable as an energy company's energy export or reduction.

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

Additional comment

A strong monitoring and reporting regime to ensure compliance and provide valuable insights is critical 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.

Helen Charters