Submitter	[redacted]
Questions	**Comments**
Q1. Do you agree the issues identified by the Authority are worthy of attention? If not, why not?	Yes this is very important and worthy of attention. Reasons: Presently most electricity consumers pay no attention to exacerbating the electricity peaks and not making use of the troughs as the pricing plan they are on is flat rate. This is terrible for the grid and the country, but it also means that consumers are missing out on lower off-peak electricity prices. Consumers need to be exposed to the wholesale electricity price at the actual ½ hour of use so that they can shift some of their consumption to lower price periods and so have lower electricity bills, but at the same time do a massive favour to the grid in lopping off the peaks and dropping them into the troughs. I do not accept the argument that poorer households without solar and batteries can do little to reduce their exposure to higher priced peak power: they can do very simple things like not tuning on washing machines, clothes dryers and dishwashers until they go to bed. They could turn on their hot water cylinders when they go to bed and turn them off when they get up in the morning, they can do slow cooking during the day at cheap rates and have the meal cooked and ready to eat before the peak rates come in the evening. They can run their logburner more when the power prices are high and the heatpump when they are low. They can put the chest freezer on a timer to only go on during off peak times, turn off lights and electronic devices when they leave the room, replace any incandescent lamps with LEDs, put a sleeping bag over the hot water cylinder and insulate any visible pipes etc. Second Reason is that Time varying plans are essential so that we don't see an overbuild of solar, all producing power in the middle of the day and the middle of summer when we don't need it. Getting a price for injecting that gives a true indication of the value of that power at that particular time of the day, time of year is essential to avoid market distortions like this
Q2. Which option do you consider best addresses the issues and promotes the Authority's main	Mandating that every company selling power to consumers offer a time varying option is the best you have presented us with, but I think better is mandating that all plans offered have to have

objective? Are there other options we have not considered?	prices that vary with time of day, time of year is essential for harnessing the massive potential of load shifting available out there. While not everyone will shift their loads to off-peak time A lot more will than if a time varying plan is offered amongst a confusing array of other plans, meaning few will take it up. I think mandating that all plans have to vary with time of day, time of year (and ideally reflect the wholesale price so in times of low lake levels will be exposed to high prices and so will have additional incentive to lower consumption)
Q3. Should we require retailers to offer a price plan with time-varying prices for both consumption and injection? Why or why not?	Absolutely essential that injectors receive the price signals that their injection is worthwhile at that time. Otherwise people with EV's won't be incentivised to inject during peak times which would be completely bizarre and likewise without these price signals there will likely be an overbuild out of solar which a Concept Consulting report * found would make the grid peakier (winter morning and eying peaks remain but daytime trough in demand becomes much deeper) and ran the risk of delaying wind installations and promoting gas peakers being built instead- this is very serious in a climate emergency * Concept Consulting Paper -Electric cars, Solar panels and batteries 2016
Q4. Do you have any feedback on the design requirements?	Hour of Power type plans risk secondary peaks and are distortionary (eg the trough in demand is normally well after these plans stop and if everyone transfers their dominant electricity uses to these times you end with a secondary peak and a significant market distortion. However if everyone is on a time of use plan, that is based on the wholesale price of power at that time, it will harness the power of the market to move consumption into these lower demand times. This brings massive benefits to the gird in terms of lowering the peaking capacity required both for generation and distribution assets. Perhaps a compromise would be mandating a minimum number of hours for "free power" to say 4 hours from 9pm to 1am.
Q5. Is there a risk that injection rebates will not be passed through to the consumers targeted? If so,	It is essential that the injectors directly receive a rebate for the benefits they bring to the distribution network capacity constraints to

how could we safeguard against this risk?	further incentivise their timely injections of electricity into the grid.
Q6. Which retailers should be captured by the proposal and why?	All retailers with 1% or greater of the market should be mandated to have (only) time of use pricing that reflects the wholesale price of electricity at that 1/2 hour time slot. How hard can this really be - It should not require a vast workforce to do this its simple software update isn't it?
Q7. What are your views on the proposed timeframe for implementation of 1 January 2026? Would 1 April 2026 be preferable, and if so why?	I have no opinion on this
Q8. What are your views on Part 2 of our proposal that would require retailers to promote the time-varying price plans?	If all plans were mandated to be time of use then there is no or less need to have mandated promotion of plans. The wording of the promotional mandate which I think could be quite tricky to design.
Q9. What should the Authority consider when establishing the approach to and format of the reporting regime?	No comment
Q10. Should the Authority include a sunset provision in the Code, or a review provision? Why?	No comment
Q11. What are your overall views on Part 3 of the proposal?	No comment
Q12. What are your views on Part 4 of our proposal to amend the Code to require that consumers are assigned to time-varying distribution charges, that retailers provide half-hourly data to distributors for settlement	No Comment

Questions	Comments
Q13. Do you agree with the objective of the proposed amendment? If not, why not?	No I don't agree. The objective should not just be about costs but also about efficiency. It is simply inefficient and more carbon intensive to build new generating capacity to cope with the peaks when these can be lopped off and dumped into the troughs in demand though time of use of electricity changes. So I ask for the objectives of energy efficiency and low carbon emission electricity sector be added.

Q14. Do you agree the benefits of the proposed amendment outweigh its costs?	No Comment
Q15. Do you agree the proposed amendment is preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objectives in section 15 of the Electricity Industry Act 2010.	No I don't agree. I think you have overstated any negative repercussions from mandating that everyone be on time of use plans that reflect the wholesale price. This really is the most efficient and least cost to consumers - they then can have the option of moving their consumption to off-peak times. Perhaps most importantly not having everyone on such a time based pricing plan is inefficient in terms of generation assets required to meet the peaks. And although minimising carbon emission may not be in the Authorities objectives, as an existential threat to whole planet, it most certainly should be. It is crystal clear that any pricing regime that does not mandate time of use related to the wholesale price is a worse carbon emissions out by a significant margin. Your proposals for promotion of time of use plans as part of a suite of plans available to consumers is weak in comparison - there is no guarantee of widespread or even significant uptake of these plans. Whereas if everyone had to be on one of these plans, uptake is guaranteed to be 100%.