

5 November 2025

Electricity Authority  
Via email: [consumer.mobility@ea.govt.nz](mailto:consumer.mobility@ea.govt.nz)

### **Lodestone Energy submission on 'Improving Electricity Billing in New Zealand'**

#### **Support for proposal while maintaining the flexibility for innovation**

Lodestone supports the EA's proposal to provide greater consistency across consumer electricity bills. We agree that bills are complex, and can be difficult for consumers to understand and meaningfully compare billing data.

For decades there has been conversation around standardisation of billing and it is timely that this issue can now provide an outcome to enable customers to make more informed switching choices. This is a short, in principle submission in support of the proposals and to endorse the stated benefits of simpler, more standardised billing.

Lodestone makes these comments as the country's leading independent renewable generator, but also as a Tier One retailer with plans for future retail innovation.

As the electricity industry evolves at ever greater pace, it is even more important that consumers are not unnecessarily confused by complex language and data which cannot be simply compared. We support a level of mandatory standardisation.

However, while Lodestone supports mandatory content, structure and the use of Plain English, a balance must be struck. A mandatory approach to core billing content should be net positive for consumers but cannot block or stifle retail product innovation.

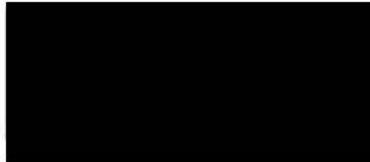
Mandatory billing requirements must also support and facilitate rapid industry evolution. Core, comparable consumption and pricing data should be standardised without reducing scope for the bill to provide new data and consumer information as new retail products and offers are developed.

Preserving flexibility alongside mandatory content is important as the industry moves towards increasing time of use pricing, mandatory half-hourly consumption data reconciliation, the inclusion of energy in new Consumer Data Right legislation, and as more opportunities emerge for consumers to participate in both the supply and demand side of the industry.

The potential for new, innovative retail offers using technology, EVs, smart appliances, domestic generation and batteries is greater than it has ever been before. We look forward

to working with the EA to ensure the benefits of standardised billing are delivered while also delivering consumer benefits through product innovation.

Yours sincerely



**Sarah McHardy**  
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