



By email: [levelplayingfield@ea.govt.nz](mailto:levelplayingfield@ea.govt.nz)

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## **SUPA supports the work of the ECTF**

SUPA Energy (SUPA) supports the ongoing operation of the ECTF.

### **Enduring grounds for collaboration and cooperation**

We consider the operation of the ECTF is efficient given the complementary skill sets and expertise the Commerce Commission and Electricity Authority have and the commonality and overlaps in some of the matters that both regulators have to address.

Some decisions by one regulator can impact the other regulator's work e.g. the Electricity Authority network pricing methodology work has potential implications for Part 4 Commerce Act regulated price paths and vice versa.<sup>1</sup>

### **Potential competition issues in the electricity sector**

We support the continuation of level playing field initiatives but would like to see a more agnostic approach that recognises competition can come from direct and traditional sources (e.g. retailer versus retailer and generator versus generator) and indirect and non-traditional or disruptive sources e.g. distributed energy resources (DER) competing against traditional poles and wire, and against both generators and retailers. The advent of mobile phone technology and the likes of UBER highlight the substantial benefits for consumers that can be unleashed from new and non-traditional supply sources.

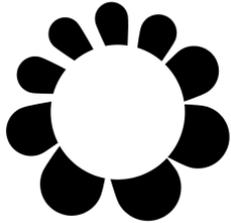
We also support the intention to prioritise network market power and flexibility issues, including looking at "Identification and evaluation of potential risks to the development of the competitive provision of flexibility services arising from market power in adjacent markets and identify possible remedies."

We would be happy to share our thoughts and concerns at an early stage of this work.

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<sup>1</sup> For example, Aurora recently [submitted](#) claiming that "the Authority have not recognised the effect the Incremental Rolling Incentive Scheme (IRIS) has on distributor's capital expenditure decisions."

Yours sincerely,



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