More Efficient Distribution Prices

Submission to the Electricity Authority

19/2/2019

1. Introduction

Buller Electricity Limited (BEL) appreciates the opportunity to make a submission to the Electricity Authority on More Efficient Distribution Prices: What Do They Look Like?

The Authority's Consultation Paper provides much needed and overdue guidance on its expectations for efficient distribution pricing. While this will promote industry wide discussion and the further development of efficient Distribution Pricing Reform, in BEL's view the Authority has failed to adequately:

- Appreciate the ongoing work the relevant ENA Working Groups are undertaking
- Engage with stakeholders to gain a good understanding of the key 'real world' issues, barriers and complexities which exist in relation to Distribution Pricing Reform

Furthermore, the Authority is:

- Overstating the dis-benefits from not urgently reforming distribution pricing
- Inappropriately adopting a heavy handed 'one size fits all' approach tailored to the worst-case Distributors

In terms of the Authority's guidance on its expectations, in many instances the information provided either does not go far enough and remains open to interpretation, lacks clarity and credibility, and/or simply misses the point. The Consultation Paper also highlights that there is absolutely no consensus in the industry about what constitutes cost-reflective pricing and how efficient outcomes can be achieved which will benefit consumers.

A key area relevant to BEL is that the Authority appears to give very limited consideration to the individual circumstances which will impact a Distributors ability or need to progress Distribution Pricing Reform at a pace which the Authority deems to be necessary. With regard to BEL's particular circumstances, we are of the view that the Authority overstates the severity of the issues which have been identified, and the urgency with which they should be addressed.

BEL agrees that the industry-led approach to Distribution Pricing Reform has not progressed as fast as the industry would like, but from BEL's perspective, this is simply a consequence of a slow and evolving definition of the problems, the complexity of the solutions required and the communication and carefully considered transition plans required for our move towards more cost-reflective pricing. This is also against a background of numerous other Distributor related Regulatory issues which are active at present, all of which require resource.

BEL will rely heavily on the ENA's work in relation to Distribution Pricing Reform and we are awaiting the ENA Distribution Pricing Working Group outputs, which will include models that we hope to use to help shape our pricing reform plans. It is inappropriate for BEL to finalise our plans for

Distribution Pricing Reform, and commit to a definite time frame for implementation, until the ENA's work is substantially completed. BEL also believe that the timing for the reform process needs to take proper account of the realities on the ground such as the real uptake of new technology in the different areas of NZ, and the uncertainties that still surround many of the facets of the Authority's proposed pricing reformation process and mechanisms.

BEL's views on the Consultation Paper are covered under the following section headings:

1. Introduction
2. General Comments
3. Individual Distribution Network Characteristics
4. Locational Pricing
5. Low Fixed Charge (LFC) Regulation
6. Pricing Structure & Proportion of Fixed/Variable Charges
7. Critical Peak Demand Pricing
8. Response to Consultation Paper Questions
9. Conclusions

2. General Comments

While the Authority's Consultation Paper provides much needed further information/guidance on its expectations with regard to Distribution Pricing Reform, it lacks clarity and some key issues are not addressed adequately and/or remain open to interpretation. The following items are of particular note and are expanded upon in the following sections:

- The Authority's views have clearly been formed with regard to the distribution networks which are in the greatest need of Distribution Pricing Reform in mind. In many situations the Authority is overstating the current need and urgency for Distribution Pricing Reform. A Distributors individual characteristics and consumers are not adequately accounted for in the Authority's proposed "Star-Rating" monitoring program, and further consideration needs to be given to the assessment of the materiality of more efficient distribution pricing for an individual network and it's consumers.
- BEL acknowledges that while the 'Current standard distribution prices do not signal when the network is congested nor when there is plenty of capacity' (Clause 2.9), the severity and implications of this will vary significantly between Distributors. In addition, it remains unclear as to how this issue can be addressed in the best interests of consumers and in relation to the Authority's expectations.
- Overall the Authority is clearly taking a very pessimistic stance as to the current state of distribution pricing, the materiality and negative impacts associated with the perceived current inefficiencies, and the ability of Distributors to implement Distribution Pricing Reform with appropriate pace (or even under urgency) in the future. The net effect of the Authority's approach and positioning indicates they are especially underestimating the ability for smaller community and consumer owned Trust Distributors to communicate and implement change at the appropriate pace their circumstances and consumers require.
- The Authority needs to provide further guidance in terms of the level of granularity with which it expects locational pricing to be applied. There is also no discussion or consideration given on what is an acceptable materiality threshold for locational price differentiation. In addition, unless there is a clear directive from the Authority or Government, differentiating

urban/rural pricing (which is an obvious issue for any locational based pricing scheme) will essentially become a political decision which will be made by individual distributors and their communities (particularly for Trust owned EDB's)

- BEL is concerned at the Authority's refusal to address the implications of the Low Fixed Charge (LFC) for the implementation of cost-reflective pricing, acknowledge that the arguments against the LFC have merit, and advocate for the removal of the LFC. The messages from the Authority of LFC Regulation seem to consistently undermine the positions of Distributors and the wider Industry with regards to these issues.
- BEL disagrees with the Authority that the removal of the wording 'to the extent practicable' in the Pricing Principles (refer page 25, Clause A4 (a) (iii) of the Consultation paper) and the assertion that this has been done to 'shift the burden of proof of what is not practicable onto distributors' needs explanation. The Authority needs to provide further guidance in terms of how and where the burden of proof lies.
- BEL is of the view that the extremely high levels of fixed charges currently being advocated by the Authority will in many cases be considered to be unpalatable, especially for smaller consumers.
- The Authority has clearly signalled its preference for Critical Peak Demand Pricing for signalling congestion related costs. BEL is unclear if the Authority has given any consideration to the implementation issues and costs which exist in relation to Critical Peak Demand Pricing, but the BEL thoughts on this are given in Section 7.
- Given the guidance the Authority has provided in the Consultation Paper, and the level of change which is being requested, BEL considers it unlikely that many Distributors will 'make substantial progress by 2020' (Clause 5.3) as carefully considered and probably lengthy price transition periods will be required. Furthermore, in many situations Distributors will deem it inappropriate to finalise plans and commit to time frames until the Authority has completed this Consultation
- Overall the Authority's efforts/performance in regard to Distribution Pricing Reform can only be regarded as being poor. The Authority needs to provide more in-depth information, become more familiar with the issues which exist, and adopt a more practical engineering & social-economic approach to some areas of its work. This is in contrast to the current approach which is driven by a pure economic interpretation of its statutory objective.

3. Individual Distribution Network Characteristics

The Authority appears to be paying limited regard to the characteristics of individual Distributors which will impact the ability and need to implement more efficient pricing in accordance with the Authority's wishes.

BEL considers that our network characteristics and current circumstances significantly reduce the need and ability for us to implement more efficient distribution pricing in the short or perhaps even medium term:

- Small rural based network with no growth and significant spare capacity available.
- Residential consumer average annual consumption is 4,777kWh.
- 62% of our residential consumers are on LFC pricing, with more migrating from standard residential pricing every year.

- In relation to the Authority's guidance BEL considers that our costs are essentially 90% fixed. Congestion related network costs are non-existent, and the only variable cost is essentially the component of transmission charges related to Interconnection Charges (approximately 10% of line charges). It is noted that this level of 'variable' transmission charges is likely to be significantly reduced under a new TPM.
- In terms of our revenue, fixed charges are forecast to account for 37.5% in 2019-20, and this proportion would be higher if the LFC regulation was removed. On average standard Residential consumers have a 50% fixed charge. Buller Electricity has had a pricing strategy in place over the past 3 – 4 years to increase in the proportion of charges collected as a fixed charge, which has been successfully implemented.
- Smart Meter penetration currently stands at only 50% in Buller. The remaining meters are owned by Trustpower and the further rollout of Smart Meters is not expected to commence before mid-2020. BEL considers that Smart Meter penetration of > 95% is required before distribution pricing can be fairly and successfully implemented. BEL is not in favour of opt-in price structures because it enables a 'cherry picking' exercise that leads to more revenue uncertainty for BEL, more complicated tariff structures and confusion in what is already a poorly understood pricing mechanism by the general public.
- In addition, BEL efforts to obtain smart meter data has shown retailers to be generally unresponsive to supply data in the right format and in a timely manner. That is the reality on the ground.
- Due to the BEL regions low socio-economic status it is expected the uptake of new technologies will be delayed by 5-10 years compared with affluent suburbs in our larger cities. As a result, BEL will have significantly more advanced warning of when the identified issues will start to become significant, and we have the ability to rapidly communicate and implement change when it is actually required. We believe that the most responsible approach for our consumers is to be an industry 'follower', not leader, with regards to price reform. This means we will be able to pick the best and least-regrets approaches that the network situation, technology uptake, and experiences of other Distributors point us to. Naturally, this pragmatic and cost-effective approach to pricing reform would presumably result in a poor star-rating score – which would be very misleading for our consumers regarding our performance.

4. Locational Pricing

A key issue which is not adequately addressed in the Consultation Paper is locational pricing and the level of granularity at which this should be applied.

- As pointed out by the Authority (Clause 3.10) 'it is not yet practical to calculate locational marginal prices on distribution networks' – which is in contrast to transmission networks.
- Rural consumers use far more network assets than urban consumers, and as a result rural fixed costs are significantly greater than urban fixed costs.
- Clause 4.24 suggests that congestion should be analysed at each network level – from system-wide to feeders and transformers, while Clause 4.26 indicates consumer grouping involves a trade-off in terms of what is practical.
- The most practical groupings for location pricing include (subject to an appropriate materiality threshold):
    1. The entire distribution network

2. Rural/Urban
3. GXP connection
4. Zone substation connection
5. 11kV Feeder
6. Distribution substation connection

- Does the Authority have any intention on providing further guidance on the granularity or materiality threshold with which location pricing should be applied? Or is this a decision which simply too divisive for the Authority to make any comment on?
- If the Authority is serious about the industry adopting price differentiation between urban and rural consumers, then it needs to consult more proactively with consumers on the community acceptance of this and facilitate Government and/or Electricity Price Review directives in support of this matter.

5. Low Fixed Charge (LFC) Regulation

BEL is concerned with the Authority's continual refusal to officially recognise and address the implications of the Low Fixed Charge (LFC) for the implementation of cost-reflective pricing, acknowledge that the arguments against the LFC have merit, and advocate for the removal of the LFC. We believe this is one of the key barriers to the introduction of pricing reform and also one of the easiest barriers to remove.

- It is acknowledged that the LFC is the responsibility of the MBIE and the Authority does not have the ability to remove the LFC. BEL is however of the view that the Authority should be able to officially state that the LFC is an impediment to it fulfilling its statutory objective.
- There is now a clear industry and political consensus that the LFC Regulations are no longer fit for purpose and the Authority should acknowledge that this is the case. It however remains to be seen if this will result in their removal. In the interests of furthering the Authority's clearly stated interpretation of its statutory objective the Authority should advocate for the removal of the LFC.
- The Authority is advocating that Distributors revenue should largely be collected using a fixed charge, which is clearly not possible while the LFC regulations remain in place.
- In areas such as Buller, over half the Residential consumers are on the LFC tariffs, with more consumers migrating to it every year. Given that our average Residential load in Buller is 4,777 kWh per connection, the vast majority of our Residential consumers would be better off on the LFC if they were eligible and chose this option.
- The Authority's previous guideline 'Variable charges under low fixed charge Regulations' is of limited value as BEL is of the view that Residential consumers (almost always single phase 15kVA capacity) do not have the option of changing their capacity at reasonable cost and in a reasonable time frame. In practice a Residential consumer is unable to affect the amount of a capacity charge, and therefore such a charge is considered to be a fixed charge. Furthermore, this guidance is not consistent with the level of fixed charging now being advocated by the Authority.
- The most substantial progress which can be made with regard to making distribution pricing more cost-reflective (with minimal effort and cost) is simply the removal of the LFC.
- If/when the LFC is removed the pricing of all Residential consumers will be treated equally (with the possible exception of a transition period), and low user pricing will revert to the

existing standard Residential consumer pricing – meaning higher fixed charges, which is in line with the Authority's stated direction.

- In terms of the best approach to phasing out the LFC, BEL is of the view that the LFC needs to be closed to existing consumers on this option, and the fixed charges gradually transitioned to standard residential rates over a number of years. In addition, grants targeted to consumers in genuine energy hardship could be used to lessen the financial impacts.

6. Pricing Structure & Proportion of Fixed/Variable Charges

BEL considers the level of fixed charges being advocated by the Authority – upwards of 70% and for some networks 90+% – is excessive, especially for smaller consumers.

- A more realistic proportion of fixed charging is 50% of line charges as either a fixed daily charge or contracted capacity.
- It is suggested that that for standard small consumer connections it is not practical to implement a different contracted capacity for each connection. The contracted capacity should simply be set at the value of the standard connection e.g. 15kVA single phase. In this situation a contracted capacity and fixed daily charge become equivalent, and if a Distributor adopts this pricing policy it should be accounted for in the star-rating monitoring system.
- Congestion related costs should be collected using congestion period targeted charges as suggested by the Authority. This would account for 0-30% of line charges depending on the congestion related costs of each Distributor.
- The remaining 20-50% of lines charges can be collected using a less targeted congestion charge e.g. ToU, anytime maximum demand or Static Peak Demand. This charge essentially acts as a dynamically varying contracted capacity and will significantly reduce the costs associated with administratively processing for contracted capacity upgrades/downgrades.

7. Critical Peak Demand Pricing

The Authority has clearly signalled its view that Static/Dynamic Critical Peak Demand charging is the most appropriate form of variable charging.

- Has the Authority given any consideration to the implementation of Critical Peak Demand Pricing?
- As far as we are aware Orion provides the best example of the implementation of Critical Peak Demand Pricing. Has the Authority made an in-depth case study of the Orion's pricing and billing implementation of their Critical Peak Demand Pricing?
- Orion's Critical Peak Demand Pricing is however by no means locational, being applied to a network wide load of 600MW. Does the Authority accept that it is only practical for each Distributor to have a single network wide Critical Peak Demand Pricing signal (price may however still vary between locations)?
- Orion uses GXP pricing/billing which makes it a very simple process to charge Retailers for their consumers consumption during Critical Peak Demand periods using a network wide flat per kW rate. The complexity of passing these charges onto consumers is then left up to the Retailer, and it is presumed that this is not done for small consumers e.g. the Retailers takes

on the risk and most consumers pay the average price of the aggregated general pool of smaller consumers. This provides a very simple and elegant solution to the problem of making Critical Peak Demand Pricing easily billable – a solution which does currently not exist for distributors which have ICP pricing/billing.
- For the many Distributors currently using ICP billing, perhaps the way forward is a hybrid ICP & GXP billing system where GXP pricing is used for the Critical Peak Demand component? This eliminates the administration cost of Distributors having to be provided with the half-hour data in the Critical Demand Periods for every ICP.

8. BEL Response to the Consultation Paper Questions

Q1. Do you agree that distributors need to reform their prices? What is the reason for your answer?

In general terms BEL agrees that Distributors need to reform their prices so that they become more serviced-based and cost-reflective. The Authority has identified issues which need to be addressed so that appropriate incentives are put in place for the uptake of new technologies. BEL however disagrees with the Authority that all Distributors need to reform pricing with the same degree of urgency, as this will depend on the individual characteristics of each Distributor.

Q2. How important and urgent are the issues identified by the Authority?

The urgency with which this reform needs to be undertaken will vary between Distributors due to their individual characteristics. For example, in the case of BEL which is experiencing no growth, no congestion related costs for network upgrades, and a very limited uptake of new technologies, the Authority is overstating:

- the issues which currently exist (and will exist in the foreseeable future)
- the urgency in which pricing reform needs to be implemented

It remains unclear as to the best manner in which distribution pricing can be reformed for Buller so that it is practical, explainable, implementable, actionable, billable, and in an overall sense fit for purpose. The Authority needs to become more aware of the issues which exist for individual Distributors and adjust their guidance and expectations accordingly. In some situations, Regulatory changes may be required to facilitate Distribution Pricing Reform. The rural/urban cross subsidy is a key factor where a clear direction from the Authority is required.

While the current consultation progress will result in BEL and the industry making significant progress in developing future of distribution pricing, significant work will remain to be undertaken to understand any new directions arising from this Authority’s Consultation process, and the work on pricing reform due out shortly from the ENA Distribution Pricing Working Group. BEL will need to take these inputs to develop our own realistic pricing reform plan and time table. The transition and communication plan associated with this change will need careful consideration and (most likely) a staged implementation.

Q3. Do you agree with the proposed Distribution Pricing Principles?

BEL supports the ENA's response to this question. The only other additional comment we have is that it is noted that the term '**to the extent practicable'** has been removed from Pricing Principle (a). BEL is not convinced of the reasons the Authority has put forward for doing so and disagrees with the Authority's assertion this change 'shifts the burden of proof of what is practicable onto Distributors' as this is simply the Authority's interpretation/guidance.

Q4. What, if any, changes would you recommend are made to the proposed Distribution Pricing Principles, and why?

BEL supports the ENA's response to this question and we do not believe that changes are required to the pricing principles.

Q5. What if any changes would you propose to the star-ratings to better reflect the relative efficiency of distribution prices?

The star-rating system appears to give limited consideration to the individual characteristics of a Distributor in terms of the required urgency for reform, pricing transition plans and/or the Distributors ability to implement pricing reform.

BEL acknowledges that there are reasons why the Authority has a desire to represent the efficiency of a distributors prices as an aggregated, single headline, single-star rated approach. However, such an approach will always be prone to inconsistencies, anomalies and mis-understandings by the different audiences.

Consequently, we do not believe such a system will provide any benefit to Distribution Price Reform overall and will potentially mis-lead consumers as to the performance of their local distribution company. It may also lead to a divisive environment, where Distributors are played off against each other, all without proper consideration for the needs of the consumers affected.

If the Authority decides to assess distributors pricing using the star-rating system regardless, then this should only be made public in the year following the finalisation of the Authority's assessment and monitoring program e.g. an assessment of 2019-20 distribution pricing should not be made public, as these have already been issued without the benefit of having this consultation process concluded.

We believe that the Authority should not just tar all EDB's with same brush – and should take local conditions and factors into account when assessing how they are performing for their consumers. A mechanism whereby the Authority conducts site visits to each EDB every two years (say), in order to have discussions regarding progress against targets set, understanding reasons for any pricing reform improvements or lags against the agreed plan, and understanding the EDB's price reform goals for the coming years would be far more useful in our view. It would also enable the Authority to provide a pro-active turn-table to ensure the good and poor examples of pricing reforms in similar EDB markets are shared with all participants, and provide a positive way to drive the overall EDB pricing reforms in the right direction, and at the appropriate pace for the circumstances of each EDB. Their reports could be published for public viewing on the Authority website. An analogy to this sort of "best practice sharing" is the July 2018 Commerce Commission publication of some useful observations on the Asset Management Plans (AMP) for EDB's, which Buller Electricity found very useful. The Authority could also consider to have a simple flow chart approach in order to determine what constitutes the appropriate pace of reform for each EDB, which would presumably include factors such as network growth, constraints, new technology uptake levels and projections, etc.

Q6. How long do you think distributors would reasonably need to introduce the different price structures discussed above?

In general terms BEL considers a timeframe for the introduction of different pricing structures is 2-3 years assuming that Smart Meter penetration is high enough and the required level of access to enough Smart Meter data exists. An exception to this could possibly be Critical Demand Peak Pricing.

It is noted that the introduction of different price structures does not imply that pricing is cost-reflective or benefit-based. The value of the prices is also a critical component in determining how cost-reflective a Distributors pricing is. Depending on a Distributors existing pricing, a transition period of a number of years may be required to migrate to the new pricing to ensure a desired level of price consistency and stability.

A more important issue for BEL is consideration of the need for Distribution Pricing Reform e.g. do the issues which currently exist on the BEL Network warrant Distribution Pricing Reform? BEL is of the view that at this point in time this is not the case for Buller and the Authority is overstating the need for Distribution Pricing Reform in our case.

For example, a consumer survey conducted by BEL in December 2018 revealed that while consumers are somewhat interested in new technology such as EV and solar/battery system installations, only a small fraction believe they are likely to purchase such systems in the near future;

Residential customers - next 5 years

- 2.1% likely to purchase an EV
- 8.2% likely to install solar energy
- 5.2% likely to install rechargeable battery power

In addition, our network has no congestion issues, and (unfortunately) limited opportunities for growth over the next few years.

Q7. Can you illustrate how and to what extent the LFC regulation hinders price reform?

The LFC Regulations are clearly at odds with cost-reflective pricing. It would appear that there is now an industry wide and political consensus on this matter – although in some instances the arguments against the LFC may vary. The Authority has avoided making recent comment on whether or not it considers the LFC to be cost-reflective, other than to produce a paper in June 2016 which provides guidance in what the Authority considers to be fixed and variable charges in relation to the LFC. This guidance essentially proposes that the Distributors circumvent the LFC by using a loop-hole which requires Smart Metering and did not exist when the Regulations were put in place.

A key requirement for the implementation of cost-reflective pricing is that Residential customers are included accurately, as it is Residential consumers that are largely responsible for creating the morning and evening demand peaks. BEL is of the view that in terms of applying a capacity charge to Residential customers (as per the Authority's June 2016 guidance) means effectively just applying a fixed charge, as the consumer is unable to effect their capacity at a reasonable cost and in a reasonable time period.

Furthermore, the LFC is over incentivising the uptake of PV solar – a key issue the Authority has identified – and does not appear to be consistent with its current interpretation of its statutory objective, and in not doing so results in the Authority sending out a mixed message to the industry. While the introduction of more targeted variable charges – as suggested in the Authority's 2016 guidance – could be used to negate the impact of the LFC, the fact still remains that the majority of the line charges to LFC customers would still be variable and not fixed as the Authority is suggesting it should be in this Consultation Paper.

It is very clear to the industry that the simplest and most significant way in which distribution pricing can be made more cost-reflective at almost no cost and effort is the removal of the LFC. In BEL's view the Authority must acknowledge that the reasons being put forward by the industry for the removal of the LFC have merit. Furthermore, BEL believe that in the interests of furthering the Authority's clearly stated interpretation of its statutory objective (such as removal of cross-subsidies), the Authority must advocate for the removal of the LFC.

Q8. How accurately has the Authority categorised distributor revenues and costs? How could this be done more accurately?

BEL believe that this question is more of a detail oriented question at this stage, given that there are larger issues within the Authority consultation paper which require consideration. As such, we do not have any meaningful comments to make on this point at present.

Q9. What, if any, would be better indicators of the efficiency of distribution prices, or the ambition of and progress being made by distributors on their price reforms?

Perhaps a bi-annual site-based visit and discussion between the Authority and the relevant Distributor that results in an Authority determination and report on the status and potential future improvement opportunities for each Distributor with respect to pricing reform. This would provide a useful mechanism for the Authority to continue to promulgate best practices amongst networks of similar characteristics and help networks to devise realistic two-yearly plans to implement appropriate pricing reform improvements for their consumers. It would also ensure the Authority remains in touch with the real issues on the ground for Distributors, which would help with the development of any future Regulations to ensure consumers are better off and to implement their statutory obligations under the Act.

Q10. What assistance could the Authority (or other stakeholders) offer distributors in order to speed up the reform process, or help to remove or reduce barriers to distribution price reform?

The key issues which BEL considers are barriers to the reform process are as follows:

- Smart Meter penetration

- Timely access to sufficiently detailed and formatted Smart Meter data – required for the analysis of different pricing structures and once implemented line charge billing
- Guidance and consideration as to how Critical Peak Demand Pricing can most easily be implemented and billed to customers

In some instances, it is likely that the Authority will be required to implement new Regulations in order to reduce barriers to facilitate distribution price reform.

9. Conclusions

The electricity industry has clearly identified a need for Distribution Pricing Reform and steady progress is being made towards understanding the complexities of the problem and developing strategies that will result in efficient outcomes which are in the best interest of consumers. An important part of this is for the Authority to recognise that the appropriate timeframes for each Distributor to transition to more cost-reflective pricing will depend of individual circumstances.

The Authority's approach in this Consultation Paper has been to adopt a heavy handed 'one size fits all' approach tailored to addressing the worst-case situation. BEL is of the view that this is approach is dysfunctional, creates a climate of distrust, and is not in the best interests of the Authority, the industry or consumers. Furthermore, in discussions with the Authority there appears to be a significant difference between the written word (the Consultation Paper) and the actual spoken view of the Authority, and this inconsistency is naturally of concern.

Key issues which the Authority needs to address include:

- Gain a more thorough appreciation of the ongoing work the relevant ENA Working Groups and other industry groups are undertaking
- Tailor its assessment of the progress of Distribution Pricing Reform with regard to the individual circumstances of Distributors
- Engage more with stakeholders to gain a good understanding of the key 'real world' issues, barriers and complexities which exist in relation to Distribution Pricing Reform
- Officially advocate for the removal of the Low Fixed Charge Regulations
- Facilitate Distributor access to timely and appropriate Smart Meter data
- Give more thought to how the Authority can facilitate a better understanding and implementation of 'real world' efficient outcomes which will benefit consumers
- If the Authority is serious about the industry adopting price differentiation between urban and rural consumers, then it needs to consult more proactively with consumers on the community acceptance of this and facilitate Government and/or Electricity Price Review directives in support of this matter.