Summary of submissions: More efficient distribution prices – what do they look like?

July 2019

The summary for submission document was re-published in July 2019 to amend and expand on references

Contents

1 Overview of the consultation

1.1 On 11 December 2018, the Electricity Authority (**Authority**) published a consultation paper entitled *More efficient distribution prices – what do they look like?* The consultation paper seeks feedback on the Authority's proposals to amend the Distribution Pricing Principles (the **Principles**) to clarify the Authority's expectations for efficient distribution prices, and monitor and rate the efficiency of distributors' prices and their progress on price reform. The Authority also sought views on how else the Authority and other stakeholders can assist distributors to progress distribution price reform.

1.2 Ten questions were posed in the consultation paper. The questions sought views on the need for reform, what changes should be made to the proposed Principles and star ratings, and the timeframe and assistance needed for implementing changes, as well as specific views on the Electricity (Low Fixed Charge Tariff Option for Domestic Consumers) Regulations 2004 (LFC), the Authority's categorisation of distributor revenues and costs, and the appropriate indicators of the efficiency of distribution prices or the ambition and progress of distributors on their price reforms.

1.3 Submissions closed on 19 February 2019. The Authority received a total of 40 submissions which covered a range of topics and perspectives. Submitters included distributors, retailers, a trade association, technology companies, and members of the public. Many submitters responded to each of the questions, while others submitted only on a few questions. The submissions are available from the Authority's website.

1.4 This document gives a high level summary of the submissions received, and identifies some of the key themes observed. It is organised according to the questions in the consultation paper. It is not intended to be comprehensive, rather, it offers a general overview. Any submitters mentioned in this document are used by way of example and are not necessarily the only parties who made a certain point. Any acronyms used in the consultation document are also used here.

2 General themes in the submissions received

2.1 A significant majority of submitters agreed that reform of distribution prices is required, although submitters' level of commitment to change, and their reasons for supporting change, varied.

2.2 Submitters were more evenly divided as to the urgency of reform, with retailers and generators more likely to see reform as urgent (Counties Power, Electric Kiwi, ERANZ, Flick, Genesis, MEUG, Mercury, Meridian). A strong note of caution about progressing change in a careful and considered way also emerged from the submissions, particularly given the impact on consumers (ENA, ERANZ, Northpower, Nova, TLC, Top Energy, Unison, Vector, Wellington Electricity). Most submitters estimated that a two to five year timeframe is appropriate to implement reform.

2.3 In terms of the proposed Principles, the most common criticism was around location-based pricing. A number of submitters considered that it was impractical (Aurora Energy, Meridian, Wellington Electricity). Others raised concerns that, under location-based pricing, customer density at different locations would have a profound impact on the level of cost allocation to each customer (Energy Trusts of New Zealand Inc, Network Waitaki). Some suggested the Authority needs to consult more proactively with consumers on the community acceptance of location-based pricing (Buller Networks, ENA). More detailed comments are set out below in relation to Questions 3 and 4.

2.4 Unconditional support for the proposed star-rating system was limited, with many submitters recommending that more thought needs to be given to the design, and around half of submitters opposing the proposal. However, submitters generally agreed that monitoring reform will be necessary with views expressed on holding distributors to account and on the benefits of a constructive approach. Submissions on this point also included that the Authority should instead monitor and measure the outcomes of pricing reform instead of only progress towards it. Consumer understanding and uptake was seen as a better indicator of price efficiency (ENA, Unison, WEL Networks), while roadmaps were the most commonly cited alternative measure of progress on pricing reform (Horizon, Network Waitaki Limited, Distribution Group).

2.4.1 Submitters were almost unanimous that the Electricity (Low Fixed Charge Tariff Option for Domestic Consumers) Regulations 2004 (the **LFC Regulation**) is a major barrier to price reform, and many suggested it needs to be removed or revised in order to pursue efficient or cost-reflective pricing (Buller Networks, ENA, Top Energy, Aurora Energy, ENA, Horizon, Mercury, Meridian, Neil Walbran, Network Waitaki Limited, Northpower, Orion, Distribution Group, Top Energy, Trustpower, Unison, WEL Networks).

2.4.2 A small number of submissions expressed concern regarding the impact of high fixed charges on energy conservation and climate change goals (Paul Taylor and Phil Hunnisett), low electricity users (Jenny Maclaren, Paul Taylor and Rod Witte) and consumer choice for innovative alternatives to match demand to capacity (Paul Taylor and Rod Witte). One submission, stated that the low [fixed] user charge should be extended across the board, as fixed charges should be minimised to promote energy efficiency, demand response and distributed generation (Solarcity).

2.5 Categorisation of distributor revenues and costs was generally seen as either inaccurate (Distribution Group, Top Energy), or not worthwhile (Orion).

2.6 Finally, the themes that emerged most strongly across all the questions posed were as follows:

- The Authority is focusing too much on economic theory or prescriptive rules rather than on outcomes or principles (Vector, Aurora Energy Flick, Vector, Network Tasman, Unison, Wellington Electricity);
- Consideration of the impact on consumers, and seeking to educate them and involve them in the reform process, will be crucial to the successful implementation of distribution pricing reform (Distribution Group, TLC, Top Energy); and
- Distributors are all different and even within each distributor there will be different areas and kinds of customer (such as high density versus lower socio-economic areas) that need to be catered for (Aurora Energy, Buller Networks, Powerco, TLC, Unison, Distribution Group).

3 Submissions in response to consultation questions

3.1 Question 1: Do you agree that distributors need to reform their prices? What is the reason for your answer?

3.1.1 As noted above, a significant majority of submitters agreed that reform of distribution prices is required (e.g., Electric Kiwi), although some submitters added qualifications to this view, such as stating that reform needs to include consultation with consumers (Top Energy) and take account of their preferences (Vector), or noted that occasional review of pricing is good regulatory practice (Distribution Group).

3.1.2 Most submitters focused on the following three reasons why distribution price reform is required:

- to ensure that distributor prices are cost reflective and that they provide strong price signals (Aurora Energy, Buller Networks, emhTrade, Northpower);

- to address the development and uptake of new technologies (Counties Power, ERANZ, Flick, Meridian, Trustpower); and

- to ensure that there is better and more efficient investment into the capacity and upgrade of networks (ERANZ, Genesis Energy, Wellington Electricity).

3.1.3 A number of industry participants noted that many distributors in New Zealand have already implemented time of use tariffs, or have begun exploring different pricing options, as a means of addressing the issues above.

3.2 Question 2: How important and urgent are the issues identified by the Authority?

3.2.1 Most submitters tended to agree that reform was important (in line with the general support for distribution price reform identified in response to Question 1 above). Most submitters also commented on the urgency of pricing reform, with responses fairly evenly divided between those who agree that pricing reform is urgent and those who do not.

3.2.2 A number of submitters, predominantly retailers and gentailers, strongly agreed that distribution pricing reform is urgent (Counties Power, Electric Kiwi, ERANZ, Flick, Genesis, MEUG, Mercury, Meridian).

3.2.3 A number of other submitters agreed that while reform was important, care needed to be taken in implementing changes, which meant that a measured pace is appropriate. A strong theme that emerged was that reform will have a significant impact on consumers, including on their bills in the short-term, and so they will need to be informed about the objectives of reform and involved in the process, and their needs considered throughout (ENA, ERANZ, Northpower, Nova, TLC, Top Energy, Unison, Vector, Wellington Electricity).

3.2.4 Fewer submitters felt that the Authority has overstated the need for reform and therefore it is not urgent (Buller Networks, Neil Walbran, Paul Taylor). A small number of submitters felt that the Authority's reliance on data and forecasts from 2015 were now outdated and contributed to its overstating the need for reform (Network Tasman, Orion). Some stated the Authority had been slow in progressing its own proposals for distribution price reform (Network Tasman, Vector).

3.2.5 One submitter stated that, because relevant technology is now cost effective or will soon be, the 2015 forecasts needed to be updated to reflect projected increased demand related to EV and the electrification of the economy in general, which lines prices should support (Solarcity).

3.3 Question 3: Do you agree with the proposed Distribution Pricing Principles, and why?

3.3.1 Submitters were relatively evenly split between those who agree with the proposed Principles and those who do not. Submitters were asked to recommend specific amendments in Question 4, but responses to this question still identified a number of more general criticisms of the Principles.

3.3.2 A number of submitters were concerned around the practicality of the implementation of location-based pricing (Aurora Energy, Wellington Electricity, Meridian).

3.3.3 A number of submissions raised concerns that under location-based pricing customer density at different locations has a profound impact on the level of cost allocation to each customer (Energy Trusts of New Zealand Inc, Network Waitaki). Some networks cover remote regions of the country, with sparse customers, while other networks span densely populated areas. Strict application of a location-specific principle would likely lead to a proliferation of tariffs, and significant price shocks. (Counties Power Consumer Trust).

3.3.4 A number of submissions support a principles-based regime rather than a prescriptive one (ENA, Powerco, Unison), believing that this maintains flexibility in pricing structures and the ability to innovate (WEL Networks).

3.3.5 Some submissions believe that the proposed Principles place too much weight on a purist model of economic efficiency and too little on customer preferences (Vector).

3.3.6 Lastly, a common theme among submissions is that simplicity is an important principle on which to base pricing (Distribution Group, Trustpower, Vector). Simplicity will ensure that consumers understand what pricing signals mean, and that they interpret those signals to lessen their consumption at peak times. The trade-off for cost-reflective, location-specific prices may be that consumers find them difficult to understand (Wellington Electricity).

3.4 **Question 4: What, if any, changes would you recommend are made to the proposed Distribution Pricing Principles, and why?**

3.4.1 There were a variety of opinions on changes to the proposed Principles. Most submissions were made in general terms, expressing opinions and suggesting other considerations that should be taken into account, rather than recommending specific amendments. Where amendments were proposed, these tended to be specific to particular submitters and therefore this section reflects that, rather than identifying themes.

3.4.2 Some submissions expressed the view that a change to the Principles was unnecessary, or that the current Principles are more effective than those proposed (Buller Networks, ENA, Orion, WEL Networks).

3.4.3 General submissions included that:

- differences in interpretation could arise from the proposed principles, leading to unnecessary variations in pricing structures (Flick);
- a principle should be included that balances ‘economics of pricing’ reform with customer requirements, specifically around flexibility, transparency and simplicity based on customer feedback (reflecting that customers’ needs change over time, and will grow in response to technology) (TLC);
- pricing should be simplified and consistent across all sectors, and maintain focus on signalling the cost of future investment (Transpower); and
- a principle should be added that sets out the high-level goals of the Principles (Vector).

3.4.4 Some specific submissions on changes to the proposed principles are summarised below.

Proposed principles (a)(i)-(a)(iv)

3.4.5 Proposed principle (a)(i) removes the phrase “and/or other regulations” contained in the current principle. Responses to this proposal included that the phrase should be retained (Northpower, Orion, Top Energy), primarily to prevent any ambiguity about the application of regulations.

3.4.6 Proposed principle a(ii) effectively incorporates and combines current principles a(ii) and a(iii). Submissions included that:

- the current principle (a)(ii) should remain, with the need for clarification on the change from signalling the impact of additional usage on “future investment” costs in current principle a(iii), to “losses” and “capacity constraints” in proposed principle (a)(ii) (Aurora Energy);
- the proposed principles a(ii) and (iii) are not consistent with principle based regulation, and should be combined (Distribution Group); and
- variable price components will not be large enough to change customer behaviour (Trustpower, Wellington Electricity).

3.4.7 Proposed principle (a)(iii) provides further guidance on pricing, reflecting that prices which signal economic costs need to reflect the costs of providing distribution services across time and location. Many responses to question 3 pointed out the variable density of the customers in a network, in addition to how radical the principle was. Concerns were raised that:

- location-specific distribution may have a profound impact on consumers in remote areas (Energy Trusts of NZ Inc);
- it was unnecessary (Vector); and
- the scope of the principle needs to be broadened (Network Waitaki Limited, Powerco, Wellington Electricity) and consulted on further (Unison).

3.4.8 Proposed principle a(iv) also provides additional guidance on pricing, including that where costs can be attributed to a specific user or set of users, those costs should be recovered from those users only (the phrase "to the extent practicable" has been removed from the current principle (a)(ii) to shift the burden of what is considered to be 'not practicable' to distributors).

3.4.9 Submissions noted that costs to a specific user or group need to be weighed against transaction costs (Top Energy), and clarification sought as to why costs that can be attributed to a specific user or set of users should be recovered from those users only, before further consideration of the principle is entertained (Trustpower).

Proposed principles (b)(i)-(b)(iii)

3.4.10 Proposed principles (b)(i)-(b)(iii) modify and consolidate the current principles (b) and (c).The proposed principles clarify that the purpose is to minimise the extent to which fixed cost recovery affects how parties use the network, rather than 'having regard to consumers' responsiveness', in order to minimise distortions in network use. The changes also reflect that prices should be benefit-based, and narrows down the current term "stakeholders" to "users".

3.4.11 Submitters commented that:

- principle (b)(i) requires further discussion as to defining the terms used, including "value" and "least distort network use" (Powerco);
- the proposed principle (b)(i) should be merged with existing principle (b) to allow for wide demand responsiveness (Aurora Energy);
- it should be reworded to read "…that least distort network use and/or best reflect the value" (Network Waitaki Limited);
- the proposed principle (b)(i) was unnecessarily complex (Distribution Group); and
- the phrase "to the extent practicable" should be retained (Top Energy).

3.4.12 Submissions on proposed principle (b)(ii) included that negotiation should be allowed for, but should be the exception (Network Waitaki Limited).

Proposed principle (c)

3.4.13 Proposed principle (c) simplifies and clarifies current principle (d). References to imprecise and unnecessary terms have been removed, and the term 'predictable' has been added to better capture the intent behind the word 'certainty'.

3.4.14 Multiple submissions suggested that the phrase "Changes to prices should have regard to the impact on stakeholders" in existing principle (d) should be largely retained in proposed principle (c) (Northpower, Top Energy, Vector).

3.4.15 Other submissions included that the principle be expanded to include simplicity and standardisation of tariffs (Genesis Energy), and that the principle be reworded to ensure practical transparency (Network Waitaki Limited).

Proposed principle (d)

3.4.16 Proposed principle (d) modifies current principle (e), to apply to a broader set of agents acting for consumers, or managing consumers' use of the network, and broadens the expectation that any costs and requirements should not be unreasonable.

3.4.17 Suggested modifications to proposed principle (d) included that the principle be simplified and acknowledge the potential costs to distributors and consumer agents of implementing overly complex pricing (Distribution Group), the word "distributors" be added after "on retailers", as costs incurred for distributors can arise from both retailers and other consumer agents (Horizon), and clarification is needed as to what "reasonable" means to prevent ambiguity (Network Waitaki Limited).

3.4.18 There was also concern expressed that a retailer or consumer agent might do any number of things that may have an unreasonable impact on consumers that are dependent on a reliable power supply, and that the principle should be reworded to reflect this (Counties Power Consumer Trust, Energy Trusts of NZ Inc).

Proposed principle (e)

3.4.19 Proposed principle (e) recognises that efficient distribution prices only lead to efficient outcomes if network users can act on them. Some concerns identified were that:

- any prediction about pricing is not a straightforward task (Orion);
- the principle would require retailers to provide information on how they may change or re-bundle distribution charges (Energy Trusts of NZ Inc, Northpower); and
- distributors have limited control in being able to satisfy proposed principle (e), as it is the retailer that determines the price structure that consumers are charged (Top Energy, Unison).

3.4.20 Some suggested amendments included that the word "connect" should be replaced with "new connections or changes to connection" and "to use network" should be removed (Top Energy), and that the principle be reworded as "Prices that vary over time should be known or predictable in advance…" (Network Waitaki Limited).

3.5 Question 5: What if any changes would you propose to the star-ratings to better reflect the relative efficiency of distribution prices?

3.5.1 Submissions in response to this question varied widely with some submitters in support of the proposed star-ratings, and some strongly opposed. Regardless of which view they took, submitters provided valuable feedback as to further matters to be considered prior to any implementation of the star-ratings.

3.5.2 Many submissions proposed that consumer feedback and preferences should first be sought, and reflected in the star-ratings, to ensure that the criteria is responsive to consumer need and understanding (ERANZ, Flick, Horizon, Mercury, Top Energy, Vector).

3.5.3 Criticisms included that the proposed star-ratings focus too closely on economic theory and efficiency, and require broader consideration as to criteria to make the ratings system more adaptive and reflective of the current environment (Aurora Energy, Flick, Northpower, Vector).

3.5.4 Other submitters called for further consideration to be given to the star-ratings criteria to ensure they fairly and accurately reflect the unique circumstances and operations of distributors and the reasons why they are using certain pricing structures (ENA, Genesis

Energy, Distribution Group). This included concern that the star-ratings do not take into consideration the disparity between areas where distributors operate, and the needs of consumers in such locations to have those differences reflected in pricing structures (Aurora Energy, Buller Networks, Powerco, TLC, Unison).

3.5.5 Submissions on time of use pricing included that the proposed star-ratings understate the benefit of that pricing structure and that it should be given a higher rating (Aurora Energy, ENA, Genesis Energy, Meridian, Northpower).

3.5.6 Some alternatives to the star-rating system were also suggested, including an increased amount of communication between the Authority and distributors, with monitoring also being imposed to ensure agreed goals were being met (Buller Networks, Network Waitaki Limited). These alternatives are discussed further in response to Question 9 below.

3.6 Question 6: How long do you think distributors would reasonably need to introduce the different price structures discussed above?

3.6.1 Many submissions indicated that pricing reform was already underway within the industry (Distribution Group), and that it is important that the industry is afforded sufficient time to ensure collaborative and effective pricing reform (Aurora Energy, Vector).

3.6.2 Many submitters found it difficult to quantify how much time might be required to bring proposed reform into effect, and this may depend largely on the size of the distributor and the resources available to them (WEL Networks, Wellington Electricity).

3.6.3 At least two years was considered necessary by many to implement changes (Buller Networks, Horizon, TLC). Others estimated that at least five years was necessary before the majority of distributors would be able to implement new pricing structures (emhTrade, Network Waitaki Limited).

3.6.4 It was also suggested that a phased or iterative approach should be taken, which would provide smaller goals to be met at shorter time intervals (emhTrade, Flick, Top Energy, Unison).

3.7 Question 7: Can you illustrate how and to what extent the LFC regulation hinders price reform?

3.7.1 There is broad agreement amongst submitters that the LFC regulation hinders price reform. The reasons cited include:

- The LFC regulation is seen as limiting cost-reflective pricing. A substantial majority of domestic consumers qualify for the LFC tariff option, which restricts distributors to under-recovering fixed costs for half their customers, leading them to set high variable charges for these customers in order to recover the distributor's costs (Centralines, ENA, Genesis).

- It does not produce any benefits to consumers opting to reduce their load (Counties Power Consumer Trust).

- It contains a prohibition on stepped and tiered prices (ENA, Unison).

- It requires two tariff variations for every residential consumer group (ENA).

- It is not clear what "variable" and "fixed" actually means, and a definition of "variable" needs to be included in the LFC regulation (Network Waitaki Limited, Powerco). Even though the Authority has proposed a legal 'work-around' to the LFC regulation whereby capacity charges (for example, based on fuse size) are treated as variable, this approach is inconsistent with the original intent of the regulations and distributors remain hesitant to apply it (TLC, Vector)

- The LFC regulation is too prescriptive and, instead, the Authority should include a pricing principle that requires distributors to consider the impact new prices will have on customers. Distributors can then consider the best approach to minimise the impact prices might have on customers and how that approach can be balanced with the other principles (Wellington Electricity).

3.7.2 Another common issue raised is that the Consultation Paper contradicts itself on the issue of the LFC regulation. The Authority recommended approaches that are in fact at odds with the guidelines provided by the Authority in 2016 (Orion). Submitters consider the Authority's compliance advice is inconsistent and not robust. For example, the Consultation Paper outlines a method for calculating efficient distribution prices but the LFC regulation imposes constraints which prevent the approach outlined from being applied in practice for more than half of all customers (Distribution Group).

3.7.3 Many submissions go as far as to say that the LFC hinders price reform to such an extent that it should be removed entirely (Trustpower, Top Energy, as this would be the most simple and significant way in which distribution pricing can be made more cost-reflective (Buller Networks). ERANZ submits that distributors should not wait for the removal of the LFC regulation before proceeding with distribution price reform, because it may take several years for this to occur (ERANZ).

3.7.4 A small number of submitters suggest the LFC regulation does allow for reform, but also acknowledged the difficulty of progressing such reform with the LFC regulation still in place (Orion, WEL Networks).Another view was that the standard [fixed] user charge is contrary to economic theory and practice, and should be abolished and replaced with the low user charge across the board, so consumers can actively participate in a smart energy future (Solarcity).

3.8 Question 8: How accurately has the Authority categorised distributor revenues and costs? How could this be done more accurately?

3.8.1 A number of submitters did not address this question. Of those that did, the general view was that the Authority has categorised distributor revenues and costs inaccurately (Distribution Group, Top Energy), although despite this view, some submitters agreed with the Authority that the majority of costs related to distribution are fixed (Vector, WEL Networks).

3.8.2 A number of submissions considered that the Authority's categorisation adds no value, and that all costs are fixed in the very short term and variable in the very long term (Orion). Electric Kiwi highlights the importance of recognising the distinction between network prices and the retail tariffs end consumers ultimately face (Electric Kiwi).

3.8.3 In relation to more accurate categorisation, submitters felt:

- there are a number of issues that create uncertainty in categorising and valuing total revenue, including a lack of easily available data, capability to conduct the modelling, and an inability to understand the effects on consumer demand and business models (emhTrade);
- it is costs at the margin that matter (emhTrade);
- the Authority should be cautious of distributors deciding what the long run marginal cost is expected to be as the risk of bias leading to inefficient price signals at the margin is high (MEUG)
- the analysis is misleading because it fails to distinguish between certain kinds of costs and expenditure and ignores the recoverable and pass-through costs which distributors recover through prices (Distribution Group);
- it is not possible to determine from disclosure information, the incremental costs that best align with variable pricing, residual costs that align with fixed pricing, and connection costs that align with connection charges or customer contributions (Distribution Group);

- the Authority should provide a best-practice model for calculation of long-run marginal costs for distributors to refer to, and provide a view on transmission cost recovery and the recovery of other industry levies and allowances (Top Energy).

3.8.4 Mercury and Genesis accepted that the Authority has made a reasonable assumption about revenues and costs (Genesis, Mercury).

3.9 Question 9: 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?

3.9.1 As noted above in response to Question 5, the star-rating system is generally not well supported, although there does not appear to be opposition to the idea of monitoring progress on price reform generally. In response to this question, submitters suggested a number of other indicators as being better indicators of the efficiency of distribution prices and the progress being made by distributors to reform pricing structures.

3.9.2 A number of submitters felt that the Authority's focus on price efficiency is misguided and instead, the Authority should seek efficient outcomes (Network Tasman, Orion, Unison, Wellington Electricity). In line with this approach, the most commonly cited indicator that submitters viewed as better than the star rating system was how well pricing aligns with customer needs (TLC) and therefore customer responses to pricing reform (ENA, Unison, WEL Networks), including customer uptake of new tariff structures (Counties Power) and movement to solar and off-peak charging of electric vehicles (Neil Walbran, Orion).

3.9.3 In terms of monitoring, a number of submitters felt that measuring distributors against the template road maps provides a good indication of progress (Horizon, Network Waitaki Limited, Distribution Group). The Authority could have an annual discussion with distributors about the progress of their pricing roadmap, its alignment with customer needs, and its meaningful delivery through retailer products (TLC) and note where progress is lagging and follow-up in those cases (Network Waitaki Limited). Engaging with customers would be an appropriate way to measure distributor pricing performance (TLC). Other submitters recommended a bi-annual site visit and discussion between the Authority and distributor (Buller Networks) or publication of a table of cost recovery by each distributor, with the distributor required to explain where it has not made sufficient progress (Nova).

3.9.4 There was also a feeling among distributors that the Authority needs to understand the individual circumstances of each distributor before making judgements, and should continue to communicate directly with distributors over their pricing plans and progress (Distribution Group).

3.10 Question 10: 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?

3.10.1 The key theme emerging in response to this question was around the LFC regulation. This was identified by the industry as being a barrier to making efficient and responsive changes (ENA, Horizon, Mercury, Meridian, Neil Walbran, Network Waitaki Limited, Northpower, Orion, Distribution Group, Top Energy, Unison, WEL Networks), and it was suggested that a unified approach by the industry (including promoting the removal of the LFC regulation) would assist (Aurora Energy).

3.10.2 Emphasis was put on the need for the Authority to consult with, and educate, consumers in order to bring about understanding of the price reform and the rationale behind it (TLC, Wellington Electricity).

3.10.3 Some submissions identified that it would assist to have standardised national pricing (including consistent format, naming, and parameters) (Counties Power, Flick, Meridian).

3.10.4 There was also consensus across submissions that access to accurate data is required (usually, distributors noted they did not have sufficient data from retailers). This includes timely data on distribution charges for retailers (Electric Kiwi), smart meter data from retailers (Network Waitaki Limited, Northpower, Powerco, TLC, Top Energy, Vector, WEL Networks).

Appendix A – List of Submitters

Submitter	Description of submitter
Aurora Energy	Electricity distributor operating in Dunedin and Central Otago
Buller Networks	Electricity distributor operating in the West Coast of the South Island
Centralines	Electricity distributor operating in Central Hawke's Bay
Counties Power	Electricity distributor operating in the Counties area
Counties Power Consumer Trust	Private trust that is the majority shareholder of Counties
Electric Kiwi	Electricity retailer
Electricity Networks Association (**ENA**)	Represents all of New Zealand's 27 electricity distribution businesses or lines companies.
Electricity Retailers Association of New Zealand (**ERANZ**)	Represents electricity retailers
emhTrade	Developer of smart power technology
Energy Trusts of New Zealand Inc	Represents all of New Zealand's 22 energy trusts who are majority shareholders of electricity distributors
Entrust	Private trust that is the majority shareholder of Vector
Federated Farmers	Rural advocacy organisation which represents New Zealand farmers
Flick Energy Limited (**Flick**)	Electricity retailer
Genesis Energy (**Genesis**)	Electricity generation and electricity, natural gas and LPG retailing company
Horizon Networks	Electricity distributor operating in the Eastern Bay of Plenty
Independent Electricity Generators Association	Represents regional electricity generation businesses
Jennifer Maclaren	Member of the public
Major Electricity Users' Group (**MEUG**)	Trade association
Mercury Energy (**Mercury**)	Electricity generator and retailer
Meridian	Electricity generator and retailer and parent of electricity retailer Powershop
Neil Walbran	Member of the public
Network Tasman	Electricity distributor operating in Nelson and Tasman
Network Waitaki Limited	Electricity distributor operating in North Otago
North Power	Electricity distributor operating primarily in the Whangarei and Kaipara region
Nova Energy	Electricity generator and retailer
Orion New Zealand Limited	Electricity distributor operating in Christchurch and Central Canterbury
Paul Taylor	Member of the public
Phil Hunnisett	Member of the public
Powerco	Electricity distributor operating in the North Island
Distribution Group (prepared by PwC)	Professional services firm submitting on behalf of the following electricity distributors: • Alpine Energy • EA Networks • Eastland Network • Electra • Horizon Energy Distribution • Nelson Electricity • Network Waitaki

	• Northpower • Power Net (representing Electricity Invercargill, OtagoNet and The Power Company) • Scanpower • Top Energy • Waipa Networks • Westpower
Rod Witte	Member of the public
Solarcity	Solar energy services company
The Lines Company (**TLC**)	Electricity distributor operating in the Waitomo region
Top Energy	Electricity distributor operating in the Northland region
Transpower	Owner and operator of the national grid
Trustpower	Electricity generator and retailer
Unison	Electricity distributor operating in the Hawke's Bay, Rotorua and Taupo
Vector	Electricity distributor operating in the Auckland region
WEL Networks	Electricity distributor operating in Central and Northern Waikato
Wellington Electricity Lines Limited (**Wellington Electricity**)	Electricity distributor operating in the Wellington region