From: energymarkets@mbie.govt.nz

To: <u>Energy Markets</u>

Subject: Electricity Price Review submission

Date: Thursday, 21 March 2019 8:48:44 p.m.

### Name (full)

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#### **Company (if applicable)**

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#### Region

Canterbury

## Category

Consumers, Consumer Groups and Advocates

### Do you accept these terms & conditions?

Yes

#### A1. Establish a consumer advisory council

Yes, If established it must have real power to force change.

#### A2. Ensure regulators listen to consumers

Regulators need more than listen, they must be empowered to act.

- B1. Establish a cross-sector energy hardship group
- **B2.** Define energy hardship
- B3. Establish a network of community-level support services to help consumers in energy hardship
- **B4.** Set up a fund to help households in energy hardship become more energy efficient
- B5. Offer extra financial support for households in energy hardship
- **B6.** Set mandatory minimum standards to protect vulnerable and medically dependent consumers
- B7. Prohibit prompt payment discounts but allow reasonable late payment fees
- B8. Seek bulk deals for social housing and/or Work and Income clients
- C1. Make it easier for consumers to shop around

there are two power comparison operators now to use to compare tariffs

# C2. Include information on power bills to help consumers switch retailer or resolve billing disputes

#### C3. Make it easier to access electricity usage data

yes, only a few retailers have this.

## C4. Make distributors offer retailers standard terms for network access

The biggest elephant in the room is the artificial value of assets created by inflating the component values, then this value is used to justify a certain return on this asset , which then is used to calculate power tarrif!

Combine that same methology with the lines companies assets and there is a double whammy hit for the household consumers.

#### C5. Prohibit win-backs

#### C6. Help non-switching consumers find better deals

#### C7. Introduce retail price caps

#### D1. Toughen rules on disclosing wholesale market information

stop generators from artificially ramping up the spot power price by reducing generating capacity, thereby making huge windfall profits!

#### D2. Introduce mandatory market-making obligations

What does this mean?

## D3. Make generator-retailers release information about the profitability of their retailing activities

## D4. Monitor contract prices and generation costs more closely

Yes, stop generators from artificially ramping up the spot power price by reducing generating capacity, and utilizing a dry year situation

#### D5. Prohibit vertically integrated companies

Yes gen/retailers, this is a must happen to split them off, to get any sort of fairness to the retail consumer on power pricing.

This would stop inter transfer pricing.

#### E1. Issue a government policy statement on transmission pricing

yes definite step. this is a natural monopoly,

line costs should reflect the transmission cost of generator location to load!

Why should auckland power be cheaper than south island power when the bulk is generated at south island power stations

#### E2. Issue a government policy statement on distribution pricing

yes, line costs should reflect the transmission cost of generator location to load!

#### E3. Regulate distribution cost allocation principles

yes, allow local generation to be distributed to local load.

This would allow new generation capacity to form and link to local transmission and hence to localised load in local communities.

#### E4. Limit price shocks from distribution price increases

Create a better model to deal with a natural monopoly for pricing

## E5. Phase out low fixed charge tariff regulations

#### E6. Ensure access to smart meter data on reasonable terms

# E7. Strengthen the Commerce Commission's powers to regulate distributors' performance

Yes, break up the cosy arrangements between, retail and associated lines companies, and the generation from new power generators

#### E8. Require smaller distributors to amalgamate

no

#### E9. Lower Transpower and distributors' asset values and rates of return

Absolutely, include" reasonable pricing test" of assets, to achieve this.

## F1. Give the Electricity Authority clearer, more flexible powers to regulate network access for distributed energy services

yes

## F2. Transfer the Electricity Authority's transmission and distribution-related

### regulatory functions to the Commerce Commission

no, but give the ComCom greater powers to investigate and enforcement to fix issues.

- F3. Give regulators environmental and fairness goals
- F4. Allow Electricity Authority decisions to be appealed on their merits
- F5. Update the Electricity Authority's compliance framework and strengthen its information-gathering powers
- **F6. Establish an electricity and gas regulator** maybe

#### G1. Set up a fund to encourage more innovation

## G2. Examine security and resilience of electricity supply

Yes, very little forward new generation is being planned.

The major Maui gas field has 7 years left??

Some of which is used to generate power, then what?

The whole system is designed as a big incentive not to add capacity to the national grid, as this deflates unit pricing, thereby reducing profits.

The market has not worked but allowed much higher electricity costs to be passed on to households, and reduced electricity costs to businesses, who have the advantage of offsetting this as an operating expense.

#### G3. Encourage more co-ordination among agencies

#### G4. Improve the energy efficiency of new and existing buildings

yes