

**From:** energymarkets@mbie.govt.nz  
**To:** [Energy Markets](#)  
**Subject:** Electricity Price Review submission  
**Date:** Thursday, 21 March 2019 11:23:15 a.m.

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**Name (full)**

Peter Binns for the trustees of LTSC

**Company (if applicable)**

LineTrust South Canterbury

**Email**

9(2)(a)

**Contact number**

9(2)(a)

**Region**

Canterbury

**Category**

Distribution Companies and Associations, Trusts, Transpower

**Do you accept these terms & conditions?**

Yes

**A1. Establish a consumer advisory council**

We favour this option.

Provided costs are not passed on to residential consumers.

**A2. Ensure regulators listen to consumers**

We favour this option.

We consider there could be a formal/ statutory role for ETNZ as a representative of consumers.

**B1. Establish a cross-sector energy hardship group**

We favour this option

**B2. Define energy hardship**

We favour this option.

Indicators for the definition of hardship will need wide agreement.

**B3. Establish a network of community-level support services to help consumers in energy hardship**

We favour this option.

We support the Salvation Army's comment about long term commitment and being culturally appropriate with no tokenism.

This could be supported by the local EDB providing an energy consultant to advise consumers, as was done in the past by some EDBs.

**B4. Set up a fund to help households in energy hardship become more energy efficient**

We agree with this option.

This could be a function of EECA.

**B5. Offer extra financial support for households in energy hardship**

We agree with this option.

**B6. Set mandatory minimum standards to protect vulnerable and medically dependent consumers**

We agree with this option.

**B7. Prohibit prompt payment discounts but allow reasonable late payment fees**

We are undecided on this option.

**B8. Seek bulk deals for social housing and/or Work and Income clients**

We are undecided on this option.

We would favour several independent consumer agencies making deals, rather than large government departments.

**C1. Make it easier for consumers to shop around**

We favour this option.

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

We favour this option.

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

We favour this option.

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

We are undecided about this option.

We consider standardisation may adversely affect competitive advantage and innovation by the EDBs.

**C5. Prohibit win-backs**

We favour this option.

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

We favour this option.

**C7. Introduce retail price caps**

We do not favour this option.

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

We favour this option.

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

We favour this option.

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

We favour this option.

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

We favour this option.

**D5. Prohibit vertically integrated companies**

We do not favour this option.

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

We favour this option.

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

We favour this option.

We consider that reliability and resilience of the networks, and affordability of electricity should be the overarching principles of the policy statement.

**E3. Regulate distribution cost allocation principles**

We are undecided about this option.

We support the idea of a review as suggested by the panel.

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

We are undecided about this option.

The issue would be included in the review proposed in E3.

**E5. Phase out low fixed charge tariff regulations**

We favour this option.

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

We favour this option.

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

We do not favour this option.

Given the complexity of the issues raised in the options paper and the diversity of the EDBs, we consider this option best addressed over time outside the general review.

**E8. Require smaller distributors to amalgamate**

We do not favour this option.

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

We do not favour this option.

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

We favour this option.

**F2. Transfer the Electricity Authority's transmission and distribution-related regulatory functions to the Commerce Commission**

We do not favour this option.

**F3. Give regulators environmental and fairness goals**

We favour both the environmental and consumer protection functions suggested in this option. Everyone will need to cooperate on the issues of climate change and poverty.

**F4. Allow Electricity Authority decisions to be appealed on their merits**

We do not favour this option.

**F5. Update the Electricity Authority's compliance framework and strengthen its information-gathering powers**

We favour this option.

**F6. Establish an electricity and gas regulator**

We do not favour this option.

We consider the present regulatory bodies could assume this role.

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

We do not favour this option.

**G2. Examine security and resilience of electricity supply**

We favour this option.

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

We favour this option.

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

We favour this option.