

Lisa Rautenbach

From: Neil Walbran [REDACTED]
Sent: Tuesday, 22 October 2024 10:38 am
To: TaskForce
Subject: Taskforce - Level Playing Field Measures

Thank you for seeking early input on Level Playing Field Measures, as per the recent Electricity Authority Market Brief:

"We are calling for early input from stakeholders to help to ensure that our level playing field measures work is comprehensive. We are specifically seeking stakeholder input on:

- what level playing field measures we should be considering;
- practical examples of level playing field measures being implemented, preferably in comparable overseas electricity markets; and
- existing published work on level playing measures that stakeholders consider would usefully inform the Authority's work."

I am sorry but I can only comment on the first point, regarding what measures to consider. I cannot offer examples from overseas markets or published work.

My comment is that the key measure will be access to flexible generation and demand services. Which it appears you are already well concentrating on.

As a developer of a consumer level flexible demand product I am particularly interested in how independent retailers can access flexible demand services and how the consumers gain the benefit of the flexible demand they provide.

I feel consumers capturing the full benefit of the flexible demand service they provide will be a key enabler of retail competition and enable independent retailers to compete more effectively with gentailers.

My ideal solution would be where individual consumers are more exposed to a time varying location specific price that rewards demand that responds to that price signal.

So retailers can compete with how they serve that load.

Currently most flexible service is provided by flexible generation.

Which is both concentrated within a few major generators / gentailers and not usually able to provide relief of congestion at the lower distribution levels (and avoid need to distribution investment).

Having said all that I think your package 2 is heading in the right direction to encourage this service and help provide a level playing field.

BUT, I would like to see package 2 extended to specifically cover rewarding consumer level demand flexibility where such demand flexibility helps avoid distribution level investment.

This could be as simple as extending package 2A to cover flexible demand as well as distributed generation. But ideally the level of reward to consumers would be linked the need (or avoidance of the need) for distribution level investment in that area specifically.

I look forward to seeing your consultation on package 2.

Cheers

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Neil Walbran

Web: www.NWCL.co.nz

