



26 March 2025

New ways to empower electricity consumers

Submission from Common Grace Aotearoa

Common Grace Aotearoa is a community of Christians working to transform unjust structures for the common good. We lead campaigns toward climate, economic and Te Tiriti justice and mentor groups of advocates to engage in collective action alongside the wider community and civil society.

Energy hardship is one of our focus areas because we can see achievable changes that the Electricity Authority can make that would benefit thousands of people, especially people on lowest incomes or medically dependent on electricity. With such enormous potential to improve people's health and wellbeing, this is an exciting area in which to call for change.

Comments

- We support the proposals, which will give consumers more options, incentivise load-shifting and encourage solar uptake.

Recommendations

- We particularly support your proposal to require companies to proactively offer these plans to customers likely to benefit. We suggest that you specify what frequency you require. **We believe that companies should proactively check, and make these offers, every three months.**
- **We suggest you broaden this requirement to *all* companies and *all* plans.** We don't understand why companies are not already required to proactively offer *all* of their plans to customers who might benefit. We suggest you require all companies to proactively check that every customer is on the cheapest plan that they offer for their energy use, and if they discover customers who are not, to inform them of the other plans that might be better for them. They should run these checks and offers every three months.

- The goal of empowering consumers also requires a work programme to finish roll-out of smart meters. To maximise the benefits of the proposal, **we recommend you progress work to minimise the number of households who are stuck with legacy meters**, who therefore do not have access to time of use plans. To maximise the speed of this rollout, the cost should be borne by companies (who also benefit from smart-meters), or the government, in order to reduce barriers to homeowners and landlords taking up the opportunity. A change to the Healthy Homes Standards is likely required so that landlords are required to allow the meter upgrade and have a deadline by which to do any prior electrical work required. Given that this process will take some time, please progress it as soon as possible.
- **Please require large power companies to offer time-of-use plans to prepay customers too.** Our understanding is that prepay customers currently cannot access time-of-use plans, even if their meter may allow it. This is penalising people for being poor because some customers may already have a usage profile that means they would pay less on a time-of-use plan, but their credit history is barring them from this option. People who are stuck on prepay due to poor credit should not be excluded from opportunities to lower their bills. Therefore, please require companies to provide prepay customers with the same opportunities to reduce their bills by load-shifting.
- Once you have retail data from companies, **please monitor prepay prices and the ability of prepay customers to benefit from time-of-use plans and other innovative options.** So long as people with poor credit history have few alternatives but prepay, there is a risk they will be excluded from savings that are available to more wealthy people.
- Offering a rebate is one good step to help increase solar uptake. We encourage you to use all other levers you have to enable households to switch to solar, in order to lower their costs, reduce reliance on fossil fuels and increase resilience in natural disasters. Please ensure that low-income households have options to access the benefits of solar too.

Thank you for considering this submission.