

Format for submissions

Submitter	Lastmyle Limited (Kris Sebro, CEO)
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Improving pricing plan options for consumers: Time-varying retail pricing for electricity consumption and supply

Q1. Do you agree the issues identified by the Authority are worthy of attention? If not, why not?	Yes, Lastmyle agrees that ensuring a resilient, efficient, and fair electricity system is of critical importance. A fairer system would also place the same impact of energy reduction as with energy production. I.e. A consumer that cannot afford solar panels but can shift energy usage should be equivalently rewarded as the net benefit is the same. This ensures that the system is designed to work for all consumers, especially those who may not have the ability to contribute to additional generation.
Q2. Which option do you consider best addresses the issues and promotes the Authority's main objective? Are there other options we have not considered?	Rather than focusing solely on time-varying consumption and buy-back plans, the Authority should consider policies that support both managed energy reduction and the growth of distributed generation.
Q3. Should we require retailers to offer a price plan with time-varying prices for both consumption and injection? Why or why not?	No. There is a risk of further complicating an already difficult-to-navigate system for consumers. The focus should be on ensuring that plans are designed to be accessible and beneficial to both retailers and consumers. Creating complex systems of injection and time varying plans may not fit into every company's business model or consumers usage patterns. Further the development and implementation costs of these systems will be passed on to the consumer. Ultimately, simpler is better. If there is a particular benefit the retailer is desirous to emphasise then this should be left with the retailer. Options to include or exclude time-varying plans should be left with the retailer.
Q4. Do you have any feedback on the design requirements?	Any design must prioritise simplicity, fairness and accessibility. Consumers must not be burdened with complex decision-making or marketing messages that shift the responsibility onto them to make the system work.
Q5. Is there a risk that injection rebates will not be passed through to the consumers targeted? If so, how could we safeguard against this risk?	Yes, there is a risk that retailers could retain some or all of the rebates instead of passing them through to consumers. Free market forces for competition should work to counteract this as retailers not passing on injection rebates will be uncompetitive. Implementing regulatory oversight and transparency requirements should also be put in place to avoid collusion.

<p>Q6. Which retailers should be captured by the proposal and why?</p>	<p>All retailers. The Authority should encourage competition by ensuring a level playing field, and that should be taken into account in the final design of the framework (acknowledging the resources and levers able to be drawn on from larger players that generate and retail).</p>
<p>Q7. What are your views on the proposed timeframe for implementation of 1 January 2026? Would 1 April 2026 be preferable, and if so why?</p>	<p>A delay to 1 April 2026 may allow retailers and technology providers to ensure that systems are in place to support fair and accessible pricing structures. However, any timeline should prioritise consumer outcomes.</p>
<p>Q8. What are your views on Part 2 of our proposal that would require retailers to promote the timevarying price plans?</p>	<p>Requiring retailers to promote time-varying plans assumes that consumer education is the primary barrier to adoption. Instead, the focus should be on ensuring that these plans are designed to be simple, fair, and beneficial for all consumers without requiring extensive consumer engagement and the associated costs.</p>
<p>Q9. What should the Authority consider when establishing the approach to and format of the reporting regime?</p>	<p>The reporting regime should place a heavy focus on measuring consumer outcomes, and include measures that indicate that the grid, generation and demand control will deliver sustainable and affordable energy in the long term.</p> <p>Metrics should include consumer benefits across different income groups, adoption rates among disadvantaged communities, and the overall impact on grid resilience.</p>
<p>Q10. Should the Authority include a sunset provision in the Code, or a review provision? Why?</p>	<p>A review provision is preferable to a sunset clause, ensuring that the effectiveness of the changes is assessed and adjusted as needed based on real-world data and outcomes.</p>
<p>Q11. What are your overall views on Part 3 of the proposal?</p>	<p>Part 3 focuses on ensuring that consumers are fairly compensated for the energy they supply. While this is important, it must be paired with benefits for reductions as well to ensure that lower-income consumers are not disadvantaged by their inability to participate.</p>
<p>Q12. What are your views on Part 4 of our proposal to amend the Code to require that consumers are assigned to time-varying distribution charges, that retailers provide half-hourly data to distributors for settlement 66 Questions Comments</p>	<p>The proposal risks creating complexity that disadvantages consumers who do not have the means or capability to engage with time-varying charges. Any system changes should be designed to be seamless and fair, ensuring that all consumers benefit.</p>
<p>Q13. Do you agree with the objective of the proposed amendment? If not, why not?</p>	<p>We agree with the objective of making the electricity system more efficient and equitable, but we are concerned that the implementation approach places too much responsibility on consumers rather than creating a system that works for them.</p>
<p>Q14. Do you agree the benefits of the proposed amendment outweigh its</p>	<p>Not necessarily. If the burden of implementation falls disproportionately on consumers and leads to increased complexity without tangible benefits (especially for</p>

costs?	disadvantaged households), the costs may outweigh the benefits. A fairer approach would be to prioritise equitable compensation for distributed generation and demand-side management.
Q15. Do you agree the proposed amendment is preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objectives in section 15 of the Electricity Industry Act 2010.	We believe the proposal requires refinement. Instead of mandating consumer behaviour changes, a better approach would be to focus on a balance of demand management and fair compensation for distributed generation.