

11 April 2025

Energy Competition Task Force
C/- Electricity Authority
P O Box 10-041
Wellington

By email: taskforce@ea.govt.nz

Dear team

Re: CROSS SUBMISSION: Consultation Paper—Time-varying retail pricing for consumption and injection

Flick welcomes the opportunity to make this cross submission on the Energy Competition Task Force (the ECTF) consultation paper that proposes regulating for time-varying retail pricing for electricity consumption and injection by mass market consumers.

Overall, submissions do not appear to be in favour of the ECTF proposal to regulate gentailers to offer time-varying pricing plans.

Independent retailers, including Flick, highlight that a workably competitive retail market would incentivise and motivate all retailers to innovate and provide a range of pricing products, including time-varying plans, for the benefit of different groups of consumers. The ECTF key focus should be on level playing field measures and requiring non-discriminatory pricing by gentailers and no cross subsidies between a gentailer's generation and retail activities.¹

While gentailers might dispute there is a lack of competition in the retail market, they raise some valid technical issues that negatively impact the cost of implementing this proposal.

Flick suggests the ECTF investigate in more detail the costs, expected benefits and potential for unintended consequences from regulating for time-varying retail pricing. A principles-based approach – or even the Government Policy Statement – may be sufficient to encourage new pricing plans for flexibility over time.

In addition, Flick believes the Authority can achieve its expected benefits by focusing on informing consumers about the benefits of reviewing whether they can benefit from changing plans. This could include information about the benefits of time-varying plans.

¹ The ENA (representing distributors) may be the party with the least vested interests and highlight in their [submission](#): "It is a common regulatory perspective worldwide that in competitive markets, prices (and associated offerings) are best set by market forces, with regulatory intervention reserved for preventing anti-competitive behaviours rather than imposing direct pricing rules." (pg 27)



Consumers are likely to consider information from the Authority as more credible than individual retailers promoting their own plans.

Better informed, consumers can choose from retailers that offer time-varying plans or other plans that have more value for a particular customer. This approach is consistent with the Authority's commitment to its role in promoting retail competition and protecting the interests of domestic consumers. As well as retailers offering consumers options to reduce their electricity costs, the market will remain open to other third parties offering consumers flexibility products and services.

Please don't hesitate to contact us if you have any further questions on the above. We note that no part of this submission is confidential.

Yours Sincerely

Naz La Gamba