Electricity Distribution Business Pricing Methodology Effective from 1 April 2020

28 February 2020

Summary of our prices from 1 April 2020

Purpose

This document describes Electra Limited's approach to setting electricity distribution prices that will apply from 1 April 2020. The revenue we earn from these charges enables us to safely and reliably build, operate and maintain an electricity network to serve electricity customers in the Horowhenua and Kapiti Coast region.

Electricity distribution prices are likely to evolve over the next five to ten years

It is clear that the use of Electric Vehicles and distributed energy resources (DER) such as solar photovoltaic generation and battery storage, is increasing. We endeavour to ensure that the operation of our network, and the services that we provide (and the prices we charge for those services), are appropriate to meet the needs of customers.

It is important that prices reflect the benefits and impacts of EV and DER connected in customer premises, together with how they interact with the network and new operational technologies. In the face of these changes we anticipate there will be an adjustment to consumption patterns and investment decisions by both consumers and distribution businesses. Accordingly, there will be adjustments in price options to deliver cost-reflective and service-oriented prices.

Electra expects to receive a positive benefit from the completion of 2 major roading projects inside our region – Peka Peka to Otaki and Transmission Gully. These roading projects are expected to greatly improve travel times in and out of Wellington and surrounding areas with a prediction this could encourage people to relocate out of Wellington into our region. As bigger households move into the region, we anticipate the benefit of increased average consumption plus new ICP connections. It is also expected that heavy transport travel times will reduce across the region and as a result we may see additional industry relocating here.

Accordingly, we have developed a pricing strategy to guide the development of our electricity distribution prices over the coming years. In summary, our pricing strategy is:

> Electra will progressively introduce service-oriented and cost-reflective price changes to fairly recover the full cost of the network from all customers that use the network.

Our pricing strategy includes key actions (which are presented in Section 3.3) and Electra- specific pricing principles (which are presented in Section 3.2) to guide the implementation of the strategy.

Our pricing strategy has a near-term focus on achieving greater cost-reflective, service-oriented, pricing which we believe will provide the foundation to manage the impact of the growth in alternative energy sources and seeks to insure correct allocation of costs across consumer groups.

The changes to our prices from 1 April 2020 continue this evolution

Our prices that will apply from 1 April 2020 includes a series of changes that are consistent with our pricing strategy. Key changes to our prices for this coming year are set out in Table 1 below.

Table 1: Changes to our prices to apply from 1 April 2020

Change	Impact on consumers
Continue transfer existing medium consumers on the Time of Use price option to the Standard price option	Medium consumers that are presently using the Time of Use price option are being encouraged to transfer to the Standard price option, which has been designed for larger volume users.
Increase Network Loss Factor	2019 review identified a need to increase our percentage network losses, this will be applied 1st April 2020
Add Control to the Medium user options	Added Controlled 20 to Medium Anytime and Medium Time of Use options
Rebalanced ToU Prices	Improved Discount / Premium model
Rebalanced Inclusive, Day/Night Control	Improved Discount / Premium model
Introduced cost-to-serve modelling per consumer group	Introduced cost allocation model per consumer group to better reflect the groups impact on fixed costs
Street and Community Lighting	Adjusted by CPI of 1.71%
Electric Vehicle ToU Price Option	New EV ToU Price

The new prices that apply from 1 April 2020 are set out in table 2. We have included the 2019/20 prices for comparison purposes.

Our pricing methodology complies with the regulatory requirements

We have reviewed our pricing methodology against the relevant regulatory requirements, and having considered the nature of our network and the practical evolution of our prices to manage disruptive change for consumers, we are comfortable that our approach complies with:

- The Electricity Authority's pricing principles
- The Electricity (Low Fixed Charges Price Options for Domestic Consumers) Regulations 2004 (LFC Regulations)
- The Electricity Industry Participation Code, Part 6 - pricing of distributed generation
- The Electricity Industry Participation Code, Part 12A - distributor use-of-system agreements and distributor prices

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Our prices that apply from 1 April 2020

Table 2: Electra's electricity distribution prices to apply from 1 April 2020

Electricity Network Prices Kapiti Coast and Horowhenua: Effective 1 April 2020

Electra owns and operates the electricity lines and distribution assets in Kapiti-Horowhenua region. Electra invoices these prices to Electricity Retailers, who then include these in your regular electricity bill.

Electra Electricity Network prices from 1 April 2020 compared to existing prices (excluding GST).

LOW USERS (<8,000 KWH PER YEAR)

	CODE	DESCRIPTION	USERS (EST.)	UNIT	PRICE 1 APRIL 2019	PRICE 1 APRIL 2020	
GENERAL PRICING	F	Fixed daily	43,667	$/day	0.1500	0.1500	
	A	Uncontrolled/Anytime	39,868	$/kWh	0.1299	0.1199	
	C	All inclusive/Composite (closed)[1]	2,749	$/kWh	0.1026	0.1085	
	DN	Night of Day/Night (9pm-7am)	762	$/kWh	0.0193	0.0361	
	DD	Day of Day/Night (7am-9pm)	-	$/kWh	0.1427	0.1471	
	M	Controlled 20 (electric hot water)	24,108	$/kWh	0.0481	0.0625	
	N	Night only (11pm-7am)	2,544	$/kWh	0.0165	0.0241	
	B	Night Boost (11pm-7am & 1pm-4pm)	2,166	$/kWh	0.0201	0.0361	
TOU[2] PRICING	TF	Fixed daily	1,170	$/day	0.1500	0.1500	
	TN	Off-Peak (11pm-7am)	-	$/kWh	0.0169	0.0435	
	TP	Peak (7am-11am & 5pm-9pm)[3]	-	$/kWh	0.1914	0.1307	
	TO	Shoulder (11am-5pm & 9pm-11pm)	-	$/kWh	0.0418	0.0871	
	M	Controlled 20 (electric hot water)	-	$/kWh	0.0481	0.0625	
	N	Night only (11pm-7am)	-	$/kWh	0.0165	0.0241	
	B	Night Boost (11pm-7am & 1pm-4pm)	-	$/kWh	0.0201	0.0361	
TOU[2] + EV[4] PRICING[5]	TEVF	Fixed daily	-	$/day	-	0.1500	
	TEVN	Off-Peak (11pm-7am)	-	$/kWh	-	0.0277	
	TEVP	Peak (7am-11am & 5pm-9pm)[3]	-	$/kWh	-	0.1307	NEW
	TEVO	Shoulder (11am-5pm & 9pm-11pm)	-	$/kWh	-	0.0871	
	TEVM	Controlled 20 (electric hot water)	-	$/kWh	0.0481	0.0625	

MEDIUM USERS (=>8,000 KWH PER YEAR)

	CODE	DESCRIPTION	USERS (EST.)	UNIT	PRICE 1 APRIL 2019	PRICE 1 APRIL 2020	
GENERAL PRICING	AF	Fixed	104	$/day	0.8000	0.9000	
	AA	Uncontrolled/Anytime	-	$/kWh	0.1000	0.0857	
	MAA	Controlled 20 (electric hot water)	-	$/kWh	-	0.0283	NEW
TOU PRICING	XTF	Fixed	92	$/day	0.8000	0.9000	
	XTN	Off-Peak (11pm-7am)	-	$/kWh	0.0113	0.0276	
	XTP	Peak (7am-11am & 5pm-9pm)[3]	-	$/kWh	0.1283	0.0830	
	XTO	Shoulder (11am-5pm & 9pm-11pm)	-	$/kWh	0.0280	0.0555	
	XTM	Controlled 20 (electric hot water)	-	$/kWh	-	0.0223	NEW
TOU[2] + EV[4] PRICING[5]	XTEVF	Fixed	-	$/day	-	0.9000	
	XTEVN	Off-Peak (11pm-7am)	-	$/kWh	-	0.0115	
	XTEVP	Peak (7am-11am & 5pm-9pm)[3]	-	$/kWh	-	0.0830	NEW
	XTEVO	Shoulder (11am-5pm & 9pm-11pm)	-	$/kWh	-	0.0555	
	XTEVM	Controlled 20 (electric hot water)	-	$/kWh	-	0.0223	

INDUSTRIAL (>40,000 KWH PER YEAR)

CODE	DESCRIPTION	USERS	UNIT	PRICE 01/04/19	PRICE 01/04/20
S	Fixed	268	$/day	1.6375	1.8012
SN	Off-Peak (11pm-7am)	-	$/kWh	0.0106	0.0238
SP	Peak (7am-11am & 5pm-9pm)	-	$/kWh	0.1154	0.0716
SO	Shoulder (11am-5pm & 9pm-11pm)	-	$/kWh	0.0251	0.0477

EXPORT[6]

CODE	DESCRIPTION	USERS	UNIT	PRICE 01/04/19	PRICE 01/04/20
EX	Small scale distributed generation	702	$/kWh	0.0000	0.0000

UNMETERED LIGHTING

CODE	DESCRIPTION	UNIT	PRICE 01/04/19	PRICE 01/04/20
CM	Maintenance fee	$/fitting/day	0.1500	0.1500
U	Community lighting	$/kWh	0.1036	0.1042
U	Unmetered/ Streetlighting	$/kWh	0.1036	0.1042

	NETWORK LOSSES	LOSS FACTOR CODE	LOSS FACTOR
NETWORK LOSS FACTOR	7.11%	1	1.076

Notes:

1. The "All Inclusive" option is only available to existing users who have electric hot water on either a Night (N) or Night Boost (B) meter which, if required, is able to be controlled by Electra. 2. ToU = Time of Use 3. Available 7 days including local and national public holidays 4. EV = Electric Vehicle 5. Electra will limit the eligibility to the EV ToU option to Residential households with plug-in hybrid (PHEV) or Battery EV (BEV) NZTA registered as a passenger carrying vehicle at an address with-in our network area (validation required) 6. For those who are generating electricity on their premises and exporting some or all of this into Electra's distribution network. Power Factor Premium This applies to commercial customers. Where the power factor is less than 0.95 Electra reserves the right to impose a power factor premium. The premium will be based on a multiplier of 2% of the monthly total Network price for every 0.01 power factor below 0.95 lagging.

Power Factor Premium

This applies to commercial customers. Where the power factor is less than 0.95, Electra reserves the right to impose a power factor premium. The premium will be based on a multiplier of 2% of the monthly total Network price for every 0.01 power factor below 0.95 lagging.

Price Option Naming

Some price options have been renamed to conform to standard industry terminology. In the table above, the previous names are shown in brackets beside the new names.

All Inclusive Option

The All-Inclusive option is no longer available except to existing users. Existing users must have electric hot water which (if required) is able to be controlled by Electra, plus either a Night or Night Boost meter.

Time of Use Option

This option (formerly Triple Saver) had previously been only available to customers using more than 25,000kWh per annum. It is now available to any customer.

Export

For those who are generating electricity on their premises and exporting some or all of this into Electra's distribution network.

EV

ICP with an Electric Vehicle (EV) registered at the ICP.

Content

1. About Electra

1.1 What we do

Over its network, Electra delivers around 408 Gigawatt hours (GWh) of electricity each year from the national grid to approximately 45,000 consumers. The energy we deliver is sold to consumers via Retailers licensed to operate on Electra's network.

Electra is owned by consumers in Horowhenua Kapiti through the Electra Trust, which appoints Directors and holds all the shares on behalf of the consumers connected to the network.

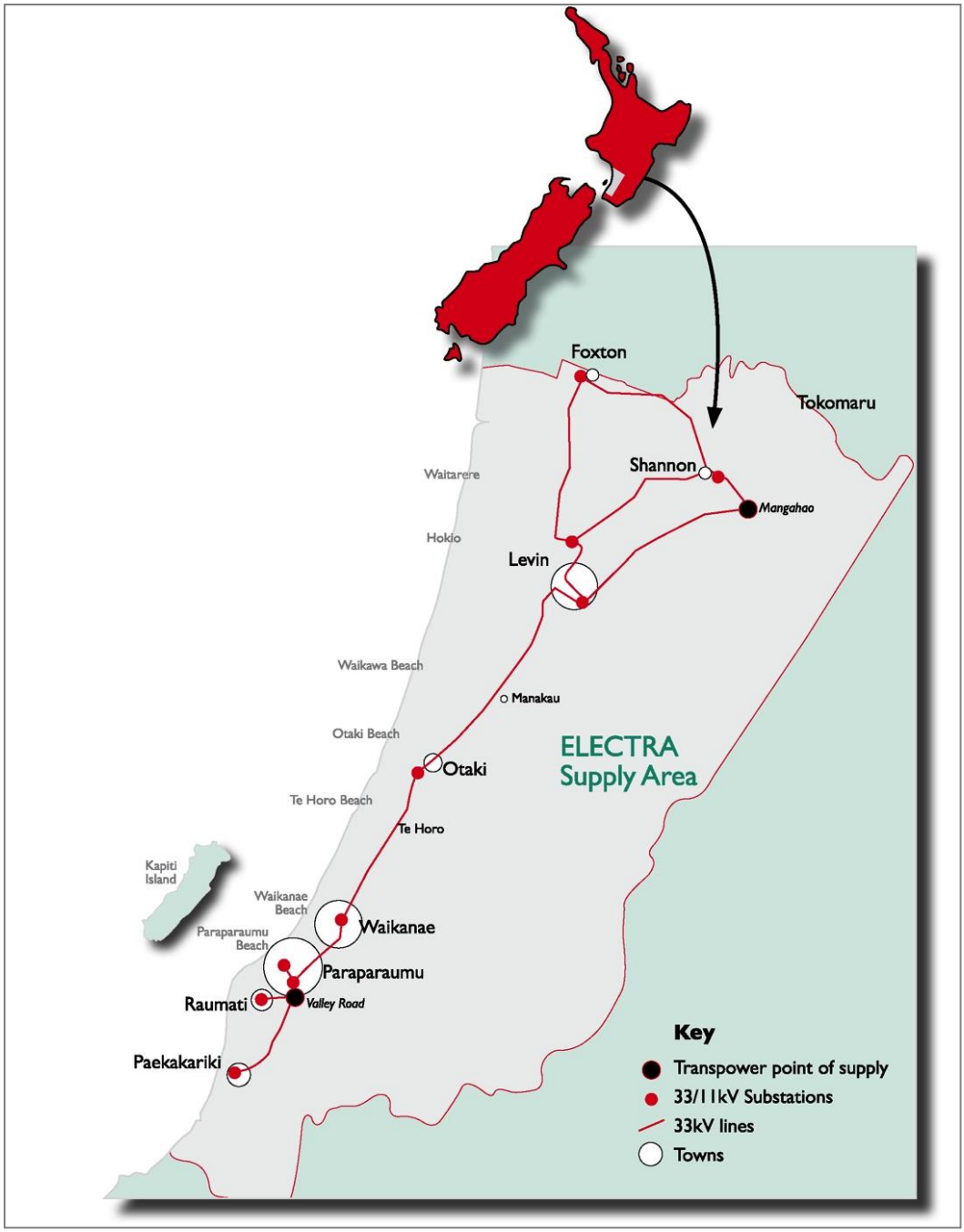


Figure 1: Electra's network supply area

1.2 About our network

We supply a geographic area of around 1700 square kilometres via network concentrated along the coast connecting urban and rural communities, businesses and homes from Paekakariki to Foxton.

We receive electricity at 33 kV from the national grid at two Transpower Grid Exit Points (“GXPs”). Our northern area (Horowhenua) connects to the Mangahao GXP, the southern area (Kapiti) connects to Paraparaumu GXP. While there is no continuous connection between these GXPs, Electra’s network accommodates a choice of points for the north-south split and is treated as one network for pricing purposes.

Our 33kV sub-transmission network supplies a series of 33/11kV zone substations located at population centres across the region. From these zone substations, 11kV distribution feeders reach out into the neighbouring communities where electricity is reduced to 400 V through distribution transformers and reticulated throughout neighbourhoods and to rural customers. Almost all consumers are connected to this low voltage network though a very small number of large consumers are supplied at 11kV.

Overlaying the electricity network, Electra’s control systems monitor and manage the integrity to the network, assisting our operations and field staff to build maintain and, when necessary conduct emergency work.

Each year in April our Asset Management Plan updates a 10-year forward view of the work we are planning on the network to continue to provide a safe and reliable supply of electricity. This work programme (together with Transpower charges) is a key influence on our prices over time.

2. How we set our prices

2.1 Approach to setting prices

Each year we review and set the prices we charge for the use of the electricity network. This is a cyclic approach and is illustrated in Figure 2.

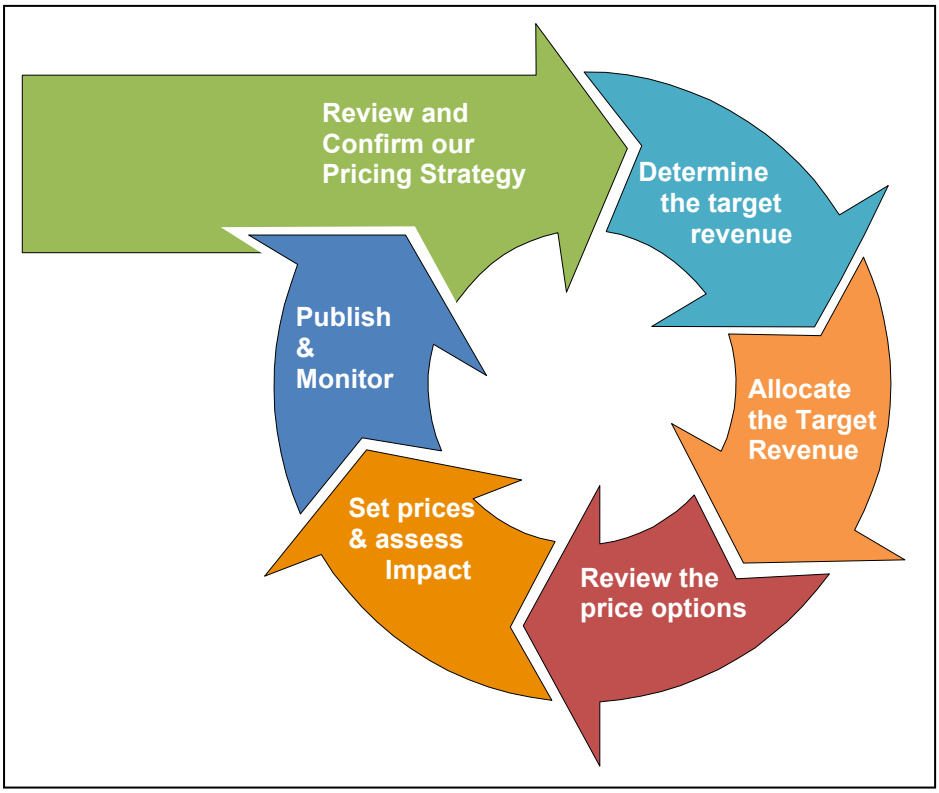


Figure 2: Electra's pricing review cycle

Our pricing review process comprises the following key steps:

- **Reviewing and implementing our pricing strategy:** to guide the evolution of our consumer groups and price options (refer to Section 3)
- **Determine target revenue:** to be recovered through prices (refer to Section 4)
- **Apportion the target revenue to consumer groups:** We review and confirm our consumer groups and allocate the target revenue to the consumer groups (refer to Section 5)
- **Reviewing price options and design:** We review and confirm the price options to be applied to each consumer group (see Section 6)
- **Setting prices and assessing the impact on consumers:** We calculate charges under each price option and assess the impact of any changes on consumers (see section 7)
- **Publishing and monitoring:** Publish our pricing methodology on our website and monitor the interaction of prices with consumption

2.2 Customers and Regulation

As a consumer owned distribution business Electra is incentivised to deliver an efficient and reliable service to its consumers. This was formally recognised in 2008 when Electra was exempted from price and quality regulations applying to electricity distribution networks under Part 4 of the Commerce Act 1986, as administered by the Commerce Commission.

While exempt from regulated price and quality control, we are subject to regulatory oversight in the form of information disclosure regulation. In addition to informing our customers of how we set our prices, this document also supports the requirements of the Commerce Commission's Information Disclosure Determination. As part of these requirements, it describes the extent to which our pricing methodology is consistent with the Electricity Authority's distribution pricing principles (see Appendix One). These principles provide guidance on economic concepts and market considerations, which are applicable for setting efficient network prices.

We also comply with the following regulations that affect pricing:

- The Electricity (Low Fixed Charges Price Options for Domestic Consumers) Regulations 2004 (LFC Regulations): These require Electra to offer a price option to domestic consumers (using less than 8,000kWh per annum) that has a fixed daily price not exceeding 15 cents
- The Electricity Industry Participation Code, Part 6 - pricing of distributed generation. Any charges applying to distributed generation (DG) connections must not exceed the incremental costs of connecting this DG to the network, including any avoided costs
- The Electricity Industry Participation Code, Part 12A: We must consult with Retailers on any changes to pricing structures

3. Our pricing strategy

3.1 Context; Electricity use and delivery options will continue to change

Over the past 10 years energy consumption per consumer has been declining as improvements in buildings and appliances require less energy to deliver the comforts and conveniences of consumers. This is true internationally as well as throughout New Zealand.

Technological innovation and the adoption of new products for networks and customers will improve reliability, customer service and customer convenience.

Evolving standards and codes for new types of connections to networks and customer installations such as batteries and Electric Vehicle (EV) chargers are adding complexity.

The use of DER is increasing, albeit from a very low base. At approximately 639 generation connections in Electra's network this represents 1.40% of all customers with an installed capacity of 2.3 MW (excluding Mangahao hydro).

The Electricity Authority promotes the provision of cost reflective distribution price options. Electra supports this initiative and together with other Distribution Businesses via the Electricity Networks Association, have been liaising with Retailers to develop common approaches to make cost reflective distribution pricing available and visible to end customers within the overall retail price options.

We acknowledge that the government has signalled a plan for the gradual removal of Low Fixed User regulations, Electra expect to start planning for these changes in the 2021/2022 price year.

3.2 Pricing principles

In the above context we have developed four pricing principles that we will use to guide the development of Electra's pricing strategy and the implementation of pricing changes over the coming years.

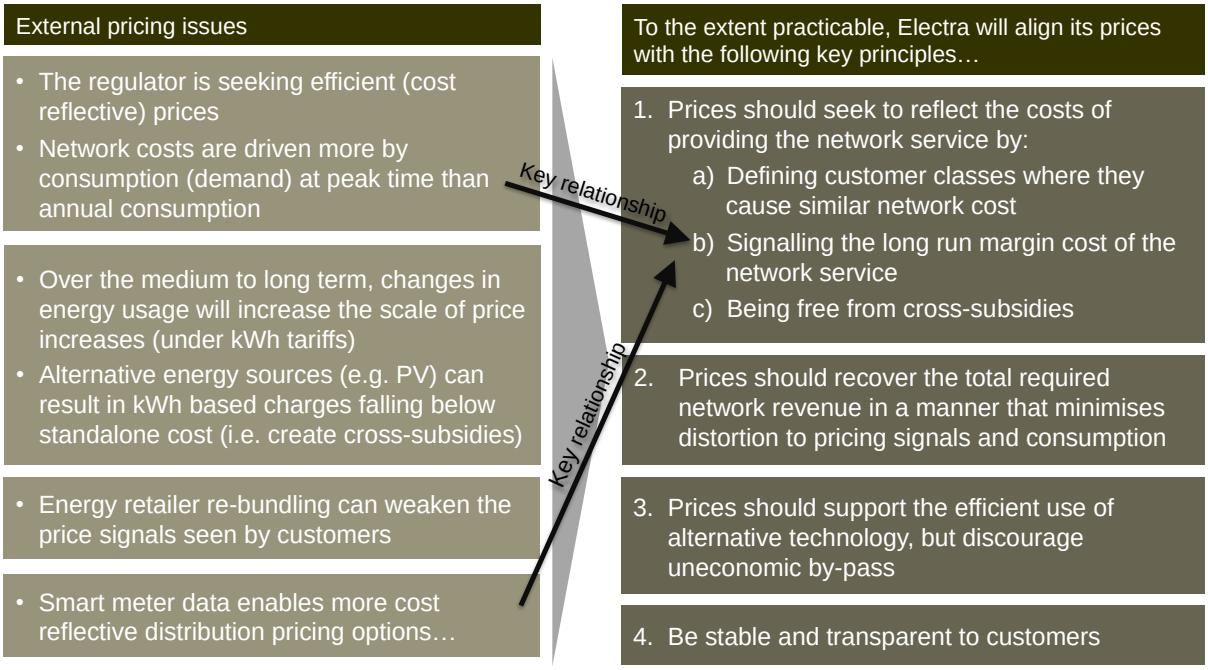


Figure 3: Electra's pricing principles

3.3 We have developed our pricing strategy to guide the evolution of our prices

Our distribution pricing strategy flows from the context of change and efficient pricing principles described in the two previous sections. Our strategy is formed to guide the evolution of our prices in a manner that:

- Implements Electra's pricing principles
- Is consistent with Electra's corporate pricing objectives
- Responds to the external issues; namely the uptake of distributed energy resources and technologies that deliver improved customer experience
- Is cognisant of industry initiatives to develop common pricing structures to aid implementation
- Our targeted returns are in line with other line business of similar size

Balancing these factors will enable Electra to evolve its prices to respond and adjust to anticipated changes in electricity production, exchange and consumption, while continuing to deliver a high level of service to customers within the evolving regulatory framework.

Electra's Pricing Roadmap

Electra will continue to progressively introduce service-oriented and cost-reflective pricing that fairly recovers the full cost of the network from all customers that use the network via the fixed charges as much as possible

To achieve this strategy, for the 2020 / 2021 price year Electra has:

1. Implemented a control price option for Medium User Anytime and Medium User ToU
2. Increased the portion of Electra cost that is recovered via the fixed prices component for Medium User Anytime, Medium User ToU and Standard
3. Introduced new pricing option targeted at Electric Vehicle owners
4. Balanced ToU price modelling

And will:

5. Consolidate closed price options and consider developing further non LFC / energy bundles, principally for domestic consumers
6. Update the cost of supply model and commensurately adjust the long run marginal cost for the network

To develop plans to:

7. Introduce a demand and/or capacity service charge across all customer groups
8. Continue to transparently explain Electra's service-oriented prices
9. Accommodate managed distributed energy resources
10. Simplify available price options
11. Continue to improve consultation on pricing
12. Review the need for Winter / Summer pricing options
13. Review zero dollar rate solar feed in price
14. Review eligibility criteria for non-standard dwellings e.g. 'Holiday Homes'

3.4 Our pricing strategy is consistent with Electra's statement of corporate intent

Electra's pricing strategy must be consistent with the Statement of Corporate Intent (SCI) that defines the overall direction and performance expectations for Electra. Electra developed a series of corporate pricing objectives (refer to Appendix Two for further details) based on the SCI.

3.5 Implications for prices in subsequent years

The key changes that could be seen in subsequent years are:

- The adjusted price options developed from a new cost of supply model, which will include an assessment of our long-run marginal cost
- Electra expects to progressively increase cost recovery from fixed components, consequently a reduction in variable prices over time is anticipated
- Improve the attractiveness of time-of-use price options for customers that can shift their peak demand periods when the grid and generation has surplus capacity
- The introduction of a demand and/or capacity charge component
- Reduction in total control price options

4. The amount of revenue we need to operate the electricity distribution network

4.1 Target revenue requirement for 2020/21

Electra determined the target revenue requirement from the Asset Management Plan and budgeting process. The target revenue is the amount of money required to safely & reliably provide an electricity network service to all electricity consumers in the Horowhenua and Kapiti Coast regions. The target revenue provides funding for operating costs, a return to our consumer owners and capital for reinvestment into the network.

Our estimate of target revenue for the 2020/21 financial year is set out in Table alongside the 2019/20 target revenue, which is provided for comparison purposes.

Table 3: Target revenue requirement

Component of target revenue	2019/20 Forecast $M	2020/21 Plan $M	Change (%) from Forecast
Transmission charges	9.7	8.6	-11.2%
Operating and maintenance	5.1	4.8	-5.9%
Administration and overheads	7.4	8.6	16.2%
Depreciation, Disposal & Interest	8.2	9.2	12.2
Distribution Sales Revenue	43.7	40.5	-7.3%
Other Sales	3.1	3.4	11.2%
Total Revenue	**46.77**	**43.92**	-6.1%

The components of target revenue are discussed below.

4.2 Transmission charges

Electra's target revenue (and hence prices set) includes the charges paid to Transpower for transmission services, and the avoided cost of transmission that Electra pays some embedded generators.

Transmission services relate to the transportation of electricity from the electricity generators (e.g. the hydro power stations, geothermal power stations and wind farms) to the Mangahao and Paraparaumu GXPs that supply Electra's electricity network.

The transmission charge component of the target revenue includes the following Transpower-related charges:

- Interconnection Charges: based on Electra's relative contribution to Regional Coincident Peak Demand (RCPD) in the Lower North Island region of the transmission grid
- Connection Charges: for the provision of connection assets at the two GXPs from which Electra receives supply from the grid
- New Investment Agreement Charges: in relation to new connection assets

Transpower also calculates a losses and constraints excess and returns this to distributors over the pricing year. As these are not known at the time of setting prices, Electra estimates the amount on an annual basis and includes this credit in the transmission revenue requirement.

In relation to the avoided cost of transmission included in the target revenue, Electra is responsible for paying all transmission charges associated with the Mangahao GXP. There is a generating station located at Mangahao and it reduces the demand placed on the transmission network (it reduces the RCPD at the GXP) and therefore reduces the total charges payable to Transpower for transmission services. In recognition for this service we pay the Mangahao power station a share of the savings (i.e. the avoided cost of transmission). We also retain some of these savings, which is a benefit to the consumers on the Electra network.

Transpower's charges have reduced for 2020/21. The main driver is Commerce Commission's reduction in Transpower's allowed regulated return, however we have seen an increase in costs at Mangahao GXP related to Interconnection charges. This is largely driven by being unable to reduce our contribution to 3 RCPD events during winter 2019. Electra is working to improve its load control algorithm to help reduce our demand during the winter peak demand periods on Transpower's network.

4.3 Operating and maintenance costs

The operating and maintenance costs included in the target revenue are obtained from Electra's Asset Management Plan (AMP) forecasts. The AMP specifies, in some detail, Electra's plans for the maintenance and development of the network and includes the forecast cost for these activities. Operating and maintenance costs have decreased in 2020/21 as a result of continually refining the planned maintenance programme.

4.4 Administration and overheads costs

Administration and overhead costs are incurred in running the distribution business activities of Electra. These costs are driven by our requirement to manage the non-engineering aspects of the business, which includes customer management, regulatory management, finance, information systems, general management, governance, regulatory compliance, and industry levies. Costs are obtained from the AMP. Administration and overhead costs have increased materially as we seek to further deliver network resilience projects, reduce energy losses, develop price options for emerging energy technologies and to drive improved customer service from our smart grid technologies (e.g. ADMS).

4.5 Depreciation

Depreciation reflects the “return of capital” from the consumption of economic life of the network assets. This charge is a standard calculation of depreciation and is based on the useful economic life of the assets. As the Electra network is constantly being renewed and replaced, an equivalent amount of capital investment is applied to the network. The extent of these capital projects is shown in our AMP. Depreciation continues to increase in 2020/21 as a result of increases to Electra’s asset base (which drives higher depreciation), and due to the recognition of disposals that result from some planned renewal projects.

4.6 Earnings Before Discount & Tax

Earnings before discount and tax are forecast to be less than expected for 2019/20, due to an increase in maintenance costs. In 2020/21 this is expected to further decrease as a result of a reduction in Distribution Sales Revenue and the additional resourcing set out above.

5. Allocation of target revenue to consumer groups

5.1 Consumer groups

The basis for the consumer groupings adopted in the 2020/21 pricing methodology is unchanged from last year. There are three primary consumer groups, with one transitional consumer group:

Table 4: Consumer groups

Consumer group	Definition
Small consumers	Consumers using less than 25,000kWh per annum (including medium residential)
Medium consumers	Consumers using between 25,000kWh and 40,000kWh per annum
Large consumers	Consumers with time-of-use ("TOU") meters using more than 40,000kWh per annum
Lighting	Streetlighting and community lighting

Electra established the three primary consumer groups as part of our 2013 pricing review. Electra reviewed the consumer groups during our most recent pricing strategy review and consider that they remain unchanged in the current phase of our pricing road map.

Street lighting and community lighting is a separate consumer group. This recognises that these connections use dedicated assets (i.e. streetlight circuits) and have unique demand profiles (i.e. at night).

There are no non-standard consumer groups (i.e. defined as applying to less than 4 connections) connected to the network.

5.2 Consumer considerations

Consumer ownership

Electra is owned by its consumers through the Electra Trust. Once sufficient earnings net of expenses has been achieved, Electra aims to provide a discount to consumer electricity bills.

Consumer feedback

Each year Electra undertakes a survey of consumers in order to better understand their views on prices, quality of supply, and consumption patterns. 300 consumers are surveyed (both residential and commercial). As we complete this version of the Pricing Methodology, preliminary indications from this year's survey are: Consumer feedback included:

Table 4: Consumer survey results

% of respondents that	Customer type	2015	2017	2018	2019
Provides a reliable electricity supply	Overall	94%	93%	90%	93%
	Domestic	NS	95%	91%	93%
	Commercial	NS	90%	88%	94%
Fixes fault quickly	Overall	76%	75%	72%	66%
	Domestic	NS	78%	75%	68%
	Commercial	NS	69%	67%	62%
Has reasonable charges	Overall	46%	43%	42%	46%
	Domestic	NS	44%	43%	48%
	Commercial	NS	42%	40%	42%

NS: Not Separated

The survey interestingly highlights a declining perception in how quickly faults are repaired, which is counter to how Electra benchmarks for performance with other EDBs. We will consider how we message this in our customer communications plan, as well as how we leverage the capabilities of our ADMS and smart grid initiatives to improve restoration performance.

The survey highlighted an increasing use of energy efficient products, which is expected to continue to exert downward pressure on consumption. In the short-term, falling consumption means variable prices per kWh will increase in order to recover the annual target revenue.

The survey also highlighted reasonable interest from consumers in alternative forms of energy with 2% of respondents indicating they had installed solar photovoltaic (“PV”) supply and 18% suggesting they were considering it.

The installation of PV creates both commercial and operational challenges and opportunities for the network. Accordingly, our new technology focus seeks to integrate smart technology on the network, in homes and businesses, in our operational systems and in our engagement with our consumers. This year, Electra will be progress this initiative by investigating the development of price options that assist consumers to better manage their energy use and costs.

Table 6: Consumer survey results

% of respondents that	Customer type	2013	2015	2017	2018	2019
Use energy efficient light bulbs	Domestic	84%	86%	85%	89%	95%
	Commercial	61%	69%	70%	73%	86%
Use of a heat pump	Domestic	32%	38%	40%	45%	46%
	Commercial	30%	40%	44%	46%	48%

5.3 Cost drivers

Overview of network attributes that influence cost drivers

Electra has considered the relevant drivers of costs that we are seeking to recover, in order to inform Electra's decisions on consumer groupings, price structures, and the level of charges.

Electra's costs are associated with investing in, maintaining, and operating the network together with the costs of taking supply from Transpower's network. The remaining costs are associated with general management and administration. The key cost drivers relevant to setting prices are therefore weighted heavily towards investment in, and operation of, the network.

Key network attributes that influence the quantity of assets and their associated operating costs are:

- The capacity of the network (measured in kVA)
- The length of circuit required to supply consumers (measured in kms)
- The number of consumer connections (measured in ICPs)
- Consumer-specific asset use
- Reliability expectations

Table 7: Key network attributes

Network attribute	Value
Consumer numbers (no.)	46006
Total circuit length (km)	2289
Consumer density (ICPs/km)	20
Zone substation installed firm capacity (MVA)	352
Maximum demand (MW)	102
Energy delivered to ICPs (GWh)	416
Energy density (kWh/ICP)	9288

Source: 2018/19 Information Disclosure, 2020/21 Asset Management Plan

Network capacity

Our network is designed and operated to meet forecast electricity maximum demand up to the level of installed firm capacity, and to provide a level of service (i.e. reliability) consistent with consumers' expectations. As maximum demand reaches installed firm capacity limits, we must consider further investments in network capacity or DER to meet demand. Consumer demand is therefore a key driver of existing and future distribution costs.

However, as can be seen in Table 7 above, Electra's network maximum demand of 102 MW is well below the zone substation installed capacity of 352 MW. This broad measure indicates that the network is not constrained at its key nodes, more specifically forecast constraints at 11 kV distribution and 400 V reticulation are addressed as set out in our AMP.

Circuit length

The length of circuit required to transmit electricity from the GXP to consumers is a key driver of network investment costs. Consumers who are further from the main supply areas create relatively higher costs for Electra. However, in comparison to other NZ networks, Electra's is relatively compact and ongoing meshing of the distribution network in urban centres and rural areas makes it difficult to distinguish line length for a particular consumer or group of consumers (due to the difficulty in tracking

electrical flows). While customer density decreases towards the edge of network, the majority of network length is shared across our entire customer base.

Consumer connections

New connections, and upgrades to connections, drive asset-related and maintenance costs. Electra's network extension policy requires consumers to pay for connection-related asset costs upfront. Each new connection also incrementally increases costs of network operations and planning, fault restoration, maintenance and general administration.

Consumer-specific asset usage

Where practical, the network costs that directly relate to a particular consumer or group of consumers are identified and recovered from those parties. This aligns recovery of costs with the beneficiary of those assets. Street lighting and community lighting is a consumer group that has specific assets identifiable and allocated to that group.

In 2013 we considered whether consumer-specific asset use could be better reflected in our pricing methodology. In particular, the use of high and low voltage assets and dedicated equipment (i.e. transformers) was considered. We concluded that there is very little variation in asset utilisation within our consumer base (e.g. less than 0.01% of consumers directly connect to 11kV feeders). For those consumers that require dedicated equipment, this is generally dealt with as part of our network extension policy, rather than through pricing. We therefore consider that there is little benefit in consumer-specific asset pricing, with the exception of street lighting and community lighting.

5.4 Allocation of costs (i.e. target revenue) to consumer groups and price options

Summary of our approach to allocating costs to consumer groups

Consistent with the preceding discussion in Section 5.3, the allocators we apply to allocate costs to consumer groups in our cost of supply model are as follows.

Table 8: Allocators applied in cost allocation model

Cost category	Cost allocator	Rationale
Return on investment, network depreciation, direct costs, rates	A composite allocator is created by allocating regulatory asset base values to consumer groups as follows: Connection assets: ICPs Streetlight assets: directly attributed to street lighting All other assets: Coincident maximum demand	The main cost driver for core network assets is utilisation of installed capacity weighted by the value of that capacity. Streetlight assets are directly attributable to the lighting consumer group, whereas connection assets are associated with number of connections
Transmission costs	Coincident maximum demand	This recognises that Transpower charges are based on providing supply capacity, determined by the capacity of the GXP and core grid assets

6. Price options and design

6.1 Price changes

As part of our pricing strategy implementation, Electra introduced two new price groupings for residential users 1st April 2019. These have lower energy charges with a higher daily charge, allowing residential consumers using above 8,000 kWh, we have evolved these in 2020/21 to support controlled price options as standard along with adding additional options to support Electric Vehicles (EVs)

6.2 Price options for 2020/21

Table 9: Electra's price options

Name	Description	Code	Price component		Unit of measure
Small consumers					
Fixed Price - General	Daily fixed charge applicable to non Time of Use consumers	F	n/a		cents/day
Uncontrolled	A standard price for using electricity at any time of the day. Can be used in conjunction with ToU price options.	A	n/a		cents/kWh
Controlled 20	A price which consumers may choose for hot water heating (and for other uses) on the basis that supply is able to be interrupted in return for a lower price. Electra is able to switch off load for up to 4 hours each day under this price	M	n/a		cents/kWh
All Inclusive	Closed	C	n/a		cents/kWh
Night	A night rate between 23:00 and 7:00 reflecting the large amount of available capacity on the network at this time. Designed for hot water, storage heating or under floor heating loads. Uncontrolled rates apply outside of these times. This does not function as a standalone option and must be used in conjunction with another price option	N	Night only	2300-0700	cents/kWh
Night Boost	As for Night with the addition of an afternoon heating boost	B	Night	2300-0700	cents/kWh
			Day	1300-1600	cents/kWh
Day/Night	For continuous electricity supply at two time of use prices: a night time rate set for the 10 hours between 21:00 and 7:00; and a peak-rate during the day	DN	Night	2100-0700	cents/kWh
		DD	Day	0700-2100	cents/kWh
Export	For those that are generating electricity and exporting some or all of this. For monitoring purposes only	EX	n/a		cents/kWh
Time of Use – low user	A three rate (peak, off-peak and night) time-of-use option available to all consumers with	TEVN	Night	2300-0700	cents/kWh
		TEVP	Peak	0700-1100	cents/kWh

	the ability to move load or otherwise take advantage of price signals			1700-2100	cents/kWh
		TEVO	Shoulder	1100-1700	cents/kWh
				2100-2300	cents/kWh
Fixed Price – Low User ToU	Daily fixed charge applicable to small consumers	TF	n/a		cents/day
Time of Use EV Low user	A three rate (peak, off-peak and night) time-of-use option available to all consumers with the ability to move load or otherwise take advantage of price signals	TEVN	Night	2300-0700	cents/kWh
		TEVP	Peak	0700-1100	cents/kWh
				1700-2100	cents/kWh
		TEVO	Shoulder	1100-1700	cents/kWh
				2100-2300	cents/kWh
		TEVM	n/a		cents/kWh
Fixed Price – Low User EV ToU	Daily fixed charge applicable to small consumers	TEVF	n/a		cents/day
	Medium Residential consumers				
Medium Residential	A price for using electricity at any time of the day. Paired with AF this has a lower charge for energy that offers cost savings for consumers using more than 8,000 kWh / year. AA+AF may only be bundled with M(AA) Control 20	AA	n/a		cents/kWh
Fixed Price – Medium Residential	Daily fixed charge applicable to non Time of Use consumers using above 8,000 kWh / year	AF	n/a		cents/day
Time of Use – Medium Residential	A three rate (peak, off-peak and night) time-of-use option available to residential consumers that offers cost savings for consumers using more than 8,000 kWh / year. It is particularly suitable for consumers that can move load to Off peak and Night periods or take advantage of price signals. Paired with XTF the XT series prices may not be bundled with any other price option	XTN	Night	2300-0700	cents/kWh
		XTP	Peak	0700-1100	cents/kWh
				1700-2100	cents/kWh
		XTO	Shoulder	1100-1700	cents/kWh
				2100-2300	cents/kWh
Fixed Price – Medium Residential ToU	Daily fixed charge applicable to Time of Use residential consumers using above 8,000 kWh / year	XTF	n/a		cents/day
Time of Use – Medium User EV	A three rate (peak, off-peak and night) time-of-use option available to residential consumers that offers cost savings for consumers using more than 8,000 kWh / year. It is for consumers that have electric vehicle that charges and is registered at the address and a that can move \ EV load to	XTEVN	Night	2300-0700	cents/kWh
		XTEVP	Peak	0700-1100	cents/kWh
				1700-2100	cents/kWh
		XTEVO	Shoulder	1100-1700	cents/kWh

	off-peak periods. Paired with XTF the XTEV series prices may not be bundled with any other price option			2100-2300	cents/kWh
Fixed – Medium User EV	Daily fixed charge applicable to Time of Use residential consumers using above 8,000 kWh / year	XTEVF	n/a		cents/day
Controlled 20 Medium User	A price which consumers may choose for hot water heating (and for other uses) on the basis that supply is able to be interrupted in return for a lower price. Electra is able to switch off load for up to 4 hours each day under this price	XTM MAA XTEVM	n/a	cents/kWh	
Large consumers					
Standard	A three rate (peak, off-peak and night) TOU option which differs from the Time of Use price by higher fixed and lower variable charges. It is targeted at larger commercial consumers by rewarding those able to move load away from peak, or otherwise take advantage of price signals	SN	Night	2300-0700	cents/kWh
		SP	Peak	0700-1100	cents/kWh
				1700-2100	cents/kWh
		SO	Shoulder	1100-1700	cents/kWh
				2100-2300	cents/kWh
Fixed Price - Standard Option	Daily fixed charge applicable to consumers on the standard pricing option	S	n/a		cents/day
Street lighting and Community lighting					
Street Lighting	Connection and management of streetlights.	U	Timetable		cents/kWh
Community Lighting	For connection and management of community lighting (e.g. sports fields, shop verandas)	U	Timetable		cents/kWh
Community Lighting Maintenance	This is a new price to recover the costs of maintaining community lighting (which was previously included in the community lighting network price)	CM	Each Fitting		cents/day

6.3 Discussion on price option design

Overall price design elements

Electra's prices are focussed towards the mass market (small and medium consumer group) because the consumer base is dominated by small loads. Domestic and small commercial users represent approximately 98% of connections and over 80% of consumption. As a result, Electra has the lowest average use per connection of all New Zealand electricity distribution businesses (approximately 7,685 kWh per consumer compared to the industry average of more than 16,000 kWh per consumer).

Mass market connections are low voltage, typically 60 Amp single phase or 40 Amp three phase. These consumers have a typical residential demand profile which peaks in the morning and early evening.

Our pricing must also cater for large commercial loads. In contrast to the mass market, most large commercial loads have time-of-use metering, and much higher levels of annual consumption (ranging

from 40,000 kWh to more than 3 GWh). They also have distinct demand behaviours: ranging from flat demand across the standard working day, to variable by time of day and season. From a cost driver perspective, large consumers have higher capacity connections and utilise a greater proportion of the installed network capacity relative to the average mass market connection.

All price groups are charged a variable price and a fixed daily charge. Fixed charges and variable prices are separated between distribution and transmission components, which seek to recover distribution and transmission costs, respectively.

Specific prices in the small, medium and large consumer groups incorporate signals which enable consumers to achieve lower overall cost of supply by moving their consumption to off-peak periods and to offer interruptible load. This aligns our pricing incentives to the cost of network capacity and capacity utilisation.

Each price option has been specified to achieve certain objectives. Electra is mindful that retail price bundling may dilute distribution price signals, it is recognised that consumer's choice will be influenced by the attractiveness of the Retailer's overall bundle. In this context Electra will continue to survey our connected consumers, transparently present price options and work with industry participants to help provide clear cost reflective distribution pricing signals to consumers.

Variable charge components

A variable price based on kWh consumption is applied to all price groups. The evolution of our AA and XT price groups to include control continues to offer lower energy charges for residential consumers while recovering a greater proportion of our fixed costs through a higher daily charge. Electra will continue to evolve its pricing to recover cost via its fixed components. Together with our LFC price options Electra now offers a broader mix of options that:

- Aligns with existing retail pricing structures
- Aligns with the LFC regulations
- Introduces options that have daily charges more closely reflecting the fixed costs of an EDB which is also aligned with the Electricity Authority's cost reflective pricing initiative.

Time of use charge components

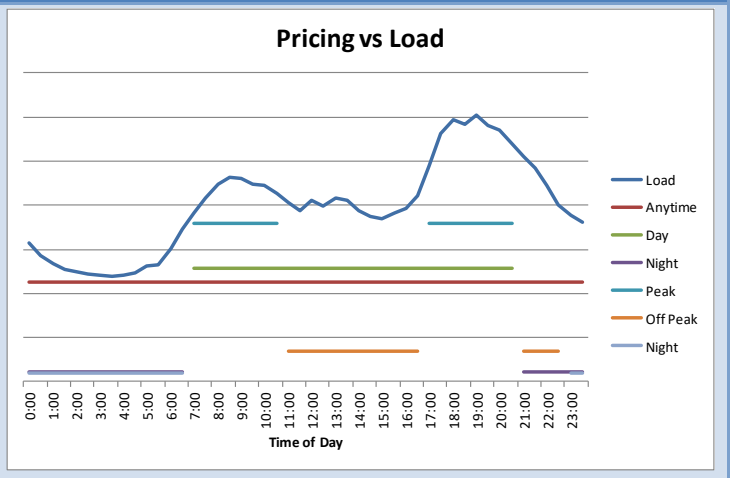
Several of Electra's price options are designed to incentivise efficient use of existing network capacity by setting higher variable prices at peak periods and lower prices during the shoulders & off-peak periods.

With the introduction of an Electric Vehicle time of use option for consumers, Electra is signalling that residential users with high amounts of discretionary load can benefit from technologies that enable the load to be managed outside of peak times. Electra will be exploring this further over the coming 12 months.

Figure 5 illustrates our time of use price options, usage periods, and how these pricing periods align to our typical daily load profile.

Figure 5: ToU periods and typical daily load profile

Price	Time-of-use Periods
Night	• Shoulder rate from 2300-0700 • Other times charged at the Managed Saver or Combined rates
Night Boost	• Off-peak rate from 2300-0700 • Boost from 1300-1600 • Other times charged at the Managed Saver or Combined rates
Night/Day	• Night rate from 2100-0700 • Day rate from 0700-2100
Time of Use Standard	• Night rate from 2300-0700 • Peak rate from 0700-1100 & 1700-2100 • Off-peak rates from 1100-1700 and 2100-2300



Controlled load price option

Controlled load price options are also offered, such as the Controlled 20 or All-Inclusive price options. These allow us to disconnect load for up to four hours a day, typically during times of high demand or in order to allow us to restore network faults.

A variable charge is levied on street lighting and community lighting consumers. This recognises network capacity use as well as the use of dedicated assets such as street lighting circuits and poles.

Other consumers are charged under the Uncontrolled price option (often in combination with controlled load price options). Approximately 50% of consumers have an Uncontrolled connection. The Uncontrolled price option recognises that these consumers are able to use the network at any time up to the capacity of their connection.

Electra expect to review the amount of total control price options we have available over the next 12 – 24 months with a view of simplifying.

Fixed charge components

A fixed daily charge is applied to all consumers. We consider that our fixed charge options appropriately recognise:

- Investments in existing network capacity
- Connection cost drivers
- Our need for revenue stability
- The LFC regulations
- The Electricity Authority's cost reflective pricing initiative

Transmission charges

Electra on-charges Transpower's costs. Fixed and variable transmission prices are set to recover transmission costs using forecasts of consumption and connections. This accommodates the different charges relating to off peak and peak pricing.

Power factor charges

Electra reserves the option to apply an additional charge where a commercial consumer has a power factor materially below 0.95 lagging. The charge will be based on a multiplier of 2% of the monthly total network charges for every 0.01 power factor below 0.95 lagging. This charge allows us to signal the need for improvements in power factors with the aim to avoid unnecessary network reinforcement.

Distributed generation (DG) price option

Electra has a small number of DG sites connected to its network (1% of connections). All but six of these are small sites (less than 10kW) which are connected at 400V. We use standard charging for import meters and do not charge for distributing exported energy. We have introduced an export price, which would potentially enable us to do this. Currently, it is set at zero cents per kWh. This has been introduced to help us monitor the uptake of DG on the network.

Electra currently does not make direct payments to DG for the avoided cost of transmission or distribution, as it is not practical to do so. Avoided costs are recognised by not charging generators for injection into the network. Electra believes this approach is consistent with the incremental cost pricing principle under Part 6 of the Electricity Industry Participation Code.

The Mangahao power station near Shannon is notionally embedded for transmission purposes. We are responsible for paying all connection charges associated with the Mangahao GXP but our consumers share in the avoided Transpower charges that result from the generator reducing peak grid demand at this GXP. ACOT is therefore implicitly recognised in this arrangement.

6.4 Non-standard pricing

Electra currently does not provide a non-standard pricing arrangement. Electra will assess any requests for non-standard pricing as required.

6.5 Network extensions policy

In addition to distribution prices, consumers are required to fully fund the cost of their own connection assets, at the time of connection. Connection assets include additional 11kV and 400V power lines and cables and transformers required to provide the electrical load and quality of supply sought by consumers. Where these assets are vested with Electra, then we will pay for the ongoing maintenance and operation of the assets. We may also provide a refund to consumers where the required asset upgrade exceeds the consumer's requirements.

Distribution prices do not seek to recover connection costs paid for by consumers under our network extension policy. Further information on our network extension policy can be found on our website at: https://electra.co.nz/our-company/disclosures/

7. Setting prices for 2020/21

7.1 Changes included in the 2020/21 prices

Overall Electra's prices have decreased and will result in a reduction of about 5% to consumer bills.

Electra has introduced a new Medium User ToU EV pricing group that recovers a greater proportion of Electra's cost through the daily charge and offer lower energy charges overnight and is modelled on our existing Medium User ToU. These provide lower overall pricing for Retailers to offer residential consumers using over 8,000 kWh with an EV registered at the address. We have also made this available to users below 8,000 kWh.

7.2 Impact of the changes in prices for 2020/21

Table 10 sets out our prices and the proportion of the target revenue forecast to be recovered from each price option in the 2020/21 pricing year.

Table 10: Summary of changes in prices - Draft

USER GROUP	PRICE CODE	ALLOCATION	REVENUE ($000)
LOW USER	**F**	**64.90%**	**$26,284.50**
MEDIUM USER	**AF**	**19.40%**	**$7,857.00**
LOW USER TOU	**TF**	**3.80%**	**$1,539.00**
MEDIUM UER TOU	**XTF**	**0.20%**	**$81.00**
STANDARD	**S**	**11.70%**	**$4,738.50**
LOW USER EV	**TEVF**	**0.00%**	**N/A**
MEDIUM USER EV	**XTEVF**	**0.00%**	**NA**

Appendix One: Consistency with the Electricity Authority's pricing principles

Pricing principle	(a) Prices are to signal the economic costs of service provision, by: (i) being subsidy free (equal to or greater than incremental costs, and less than or equal to standalone costs), except where subsidies arise from compliance with legislation and/or other regulation;
Compliance	This principle requires that prices are subsidy free where they fall within the range of incremental cost and stand alone cost, as illustrated by the following equation. Incremental Cost ≤ Prices ≤ Stand Alone Cost **Incremental Cost** Incremental cost means the additional cost incurred in connecting one more consumer to the network. This is likely to comprise connection costs, any costs associated with reinforcing the network in relation to that connection, as well as additional administration, operating and maintenance costs. Electra's prices are close to the average cost for typical consumers in each customer class, hence prices are greater than incremental costs. **Standalone cost** The standalone cost means the cost to provide services to a consumer (or group of consumers) on a standalone basis, either from a standalone network or alternative energy supply. What this cost looks like depends on the location of the consumer relative to the GXP. We estimate that a constant load greater than 5MW and closer than 2km to a GXP would be required to make bypass cheaper than our existing prices. The annualised cost of this would be in the order of $100,000. The standalone costs for smaller consumers would still be significant due to the infrastructure required to transform and transport electricity from 33kV (at the GXP) to 400V to enable supply to a consumer. Hence, for a typical consumer it is obvious that our prices are significantly below the standalone cost. **Rural/urban cross-subsidy** A cross-subsidy could potentially arise from not explicitly recognising circuit length as a cost driver in prices. As discussed earlier, the only discernible cross-subsidy that is likely to arise in relation to circuit length is between rural and urban consumers. While consumers in urban areas could be subsidising rural consumers due to relatively higher connection density, Electra does not consider disaggregating rural and urban consumers for pricing purposes is beneficial for the following reasons: • Rural circuits, poles, and equipment are used by urban consumers as electricity may flow through sub-transmission and distribution circuits to urban centres. • Our network area is relatively compact so rural areas are close to urban areas. • Electra does not differentiate service quality by location. Network reliability standards are based on the aggregated load for all consumers supplied by the relevant section of the network. Fault response times are similar for rural and urban connections because all connections are located within 30 minutes drive of a depot. • The Electricity Industry Act 2010 includes provisions for regulations to be applied to distributors that would limit price increases in rural areas.

Pricing principle	**(ii) having regard, to the extent practicable, to the level of available service capacity; and**
Compliance	Electra groups consumers into small, medium and large consumer groups because they use service capacity differently. Lighting is also a separate consumer group in recognition of the specific demand profile of this group. The Electra Network is relatively unconstrained (as can be seen by the low level of system development capex included in our Asset Management Plan). Hence, presently we do not need to signal the economic cost of the available service by way of scarcity pricing or other such pricing mechanisms. Electra uses differential prices for peak/off-peak and day/night loads to provide consumers with signals in relation to periods of peak demand that are likely to drive costs over the long-term. Similarly, the controlled tariff option rewards consumers that offer up interruptible load.
Pricing principle	**(iii) signalling, to the extent practicable, the impact of additional usage on future investment costs.**
Compliance	Electra has considered further detailed work to calculate the long run marginal cost, though this work is not a priority due to the unconstrained nature of the Electra Network, hence the low long-run marginal cost. With that said, Electra has added control to our Medium User price groupings that recover a larger proportion of distribution costs through higher daily charges, while to the extent practical we are also using time of use energy prices to signal the costs of meeting peak demand and to encourage consumers to consider the benefits of moving demand away from peak periods.
Pricing principle	**(b) Where prices based on 'efficient' incremental costs would under-recover allowed revenues, the shortfall should be made up by setting prices in a manner that has regard to consumers' demand responsiveness, to the extent practicable.**
Compliance	Refer (a) (iii) above
Pricing principle	**I Provided that prices satisfy (a) above, prices should be responsive to the requirements and circumstances of stakeholders in order to:** **(i) discourage uneconomic bypass;**
Compliance	The Electra pricing methodology combined with the nature of our consumer base has not resulted in any uneconomic bypass of the network. We estimate that a constant load greater than 5MW and closer than 2km to a GXP would be required to make bypass cheaper than our existing prices. We do not have any connections which meet these criteria. At that level of load, system bypass would not only be economic but probably appropriate for the customer. Electra remains open to discussing alternative pricing arrangements with large consumers that are presented with bypass opportunities.
Pricing principle	**(ii) allow for negotiation to better reflect the economic value of services and enable stakeholders to make price/quality trade-offs or non-standard arrangements for services; and**
Compliance	Electra does not have 'non-standard' pricing arrangements. The nature of the Electra network and consumer base does not allow for differences in the level of quality, hence there is no justification for non-standard terms. To the extent practical, requests for specific levels of service (e.g. the provision of dedicated equipment) are typically dealt with under our network extensions policy. This

	policy gives consumers the discretion to select the assets and hence quality of supply that meet their requirements, with incremental asset costs met by the beneficiary. We recover the cost of maintaining the asset through our normal revenue stream.
Pricing principle	**(iii) where network economics warrant, and to the extent practicable, encourage investment in transmission and distribution alternatives (e.g. distributed generation or demand response) and technology innovation.**
Compliance	The Controlled 20, Night, and Night Boost price options provide incentives to consumers to invest in night store equipment and controllable hot water cylinders. This effectively provides for a consumer demand response that reduces usage during times of network congestion. Distributed generation ("DG") is not charged for distribution services. This encourages connection of DG, consistent with Part 6 of the Electricity Industry Participation Code. However, we will continue to review the impact of DG uptake on the network through the Export price option. The GXP sharing arrangement with the Mangahao hydro scheme, which is notionally embedded in our network, acknowledges this plant as a transmission alternative. In return, our consumers share in transmission cost savings arising from local generation. This contractual arrangement is an example of a transmission alternative that lowers prices to consumers.
Pricing principle	**(d) Development of prices should be transparent, promote price stability and certainty for stakeholders, and changes to prices should have regard to the impact on stakeholders.**
Compliance	Electra has transitioned price increases over multiple years to avoid price shock. For example, Electra has increased the content of the Time of Use price options (formerly Triple Saver) over a number of years.
Pricing principle	**(e) Development of prices should have regard to the impact of transaction costs on Retailers, consumers and other stakeholders and should be economically equivalent across Retailers.**
Compliance	Electra's relatively simple price options ensure low transaction costs for all. We have a bias towards price option simplicity which minimises transaction costs for Retailers. All Retailers operating on Electra's network pay the same prices. All consumers are able to remain on their current price option or choose another more suited to their needs.

Appendix Two: Electra pricing objectives

Introduction

The emergence of alternative energy sources, changes in consumer demands, and an increased regulatory interest in pricing issues, has led to a renewed focus on electricity line pricing. This increased focus has led Electra to undertake a strategic review of distribution line pricing arrangements with a view to developing a long-term line pricing strategy.

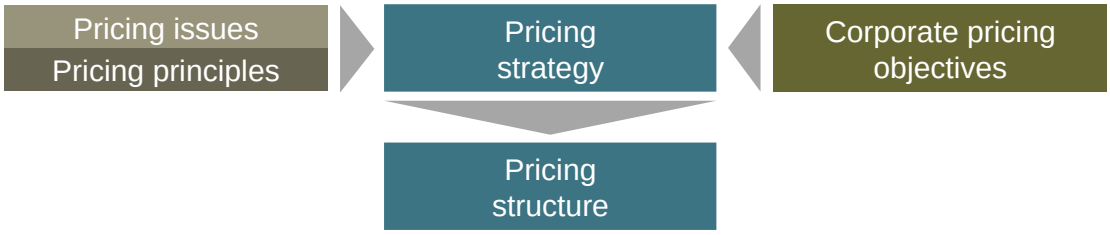


Figure 6: Drivers of the pricing strategy and pricing structure

Corporate pricing objectives

Electra's statement of corporate intent ("SCI") defines the overall direction and performance expectations for the Electra Network. For the SCI we have developed a series of corporate pricing objectives. These are statements that we believe the pricing strategy needs to be "tested" against to ensure that it will satisfy Electra's corporate objectives.

Figure 7: Proposed corporate pricing objectives

Appendix Three: Glossary

Electra has sought to present the pricing methodology using standard industry terminology and to include relevant information to enable pricing decisions to be readily understood by consumers. This glossary is provided for the convenience of the reader.

Term	Meaning
2019/20	The year starting 1 April 2019 and ending on 31 March 2020
2020/21	The year starting 1 April 2020 and ending on 31 March 2021.
ACOT	Avoided Cost of Transmission: The difference between actual transmission costs and theoretical transmission costs if certain mitigation (e.g. Distributed Generation) is not present.
AMP	Asset Management Plan: A record of the company's plans to manage the network to provide a specified level of service.
Coincident Maximum Demand (CMD):	Relative demand (kW or kVA) of a particular consumer or consumer group at the GXP system peak (i.e. as measured by system maximum demand).
Commerce Commission (ComCom)	Responsible for the economic regulation of electricity distribution businesses as provided for under Part 4 of the Commerce Act 1986.
Electricity Authority (EA)	Responsible for regulation of the electricity market as provided for under the Electricity Industry Act 2010.
GXP	Grid Exit Point: The point at which Electra's network is deemed to connect to Transpower's transmission network.
ICP	Installation Control Point: A point of connection on a local network which the distributor nominates as the point at which a Retailer will be deemed to supply electricity to consumers (i.e. a consumer connection point).
Information Disclosure Determination	As set out in the Commerce Commission's Electricity Distribution Information Disclosure Determination 2012, issued 1 October 2012 (Decision No. NZCC22).
kVA	Kilo Volt-Amp: Measure of apparent electrical power usage at a point in time.
kWh	Kilowatt hours: Measure of real electrical power usage per hour.
Low fixed charge regulations	As set out in the Electricity (Low Fixed Price Option for Domestic Consumers) Regulations 2004. These require Electra to make a price option available for domestic consumers who have annual usage less than 8,000kWh. Prices must be set such that the fixed daily charge does not exceed 15 cents (excl GST) and consumers should be no worse off under this price option at 8,000 kWh relative to other prices.
Power Factor	The ratio of real power (e.g. kW) to apparent power (e.g. kVA). 0.98 is considered normal on our network.
RCPD	Regional Coincident Peak Demand: Transpower calculates its interconnection charge for each GXP by its relative share of RCPD.
Sub-transmission	A power line that transports or delivers electricity at 33 kV on Electra's network.
System Maximum Demand	Aggregate peak demand for the network, being the coincident maximum sum of GXP demand and embedded generation output.

Term	Meaning
Target revenue requirement	The revenue to be recovered through prices over the pricing year in order to recover Electra's costs of investing in and operating the network.
ToU	Time of Use: Refers to price options that rely on meters that measure consumption by time of use.
Transpower	Transpower New Zealand Limited: The owner and operator of the national electricity transmission network. Transpower delivers electricity from generators to distribution networks and large direct connect consumers around the country.
EV	Electric Vehicle – this includes any vehicle that can be driven entirely by battery and is an NZTA registered BEV or PHEV with-in Electra's Network
Retailer	Electricity Retailer that Electra supplies