Queueing and management policy and clock stop/start mechanism for distributors

For load applications greater than 69kVA and distributed generation applications greater than 10kW

Effective from 1 December 2026 (for distributed generation) and from 1 June 2027 (for load)

DOCUMENT MANAGEMENT AND CONTROL

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This Policy will be reviewed every other year, at minimum, by the ENA Board, or sooner if warranted by internal or external events or changes.

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1. Introduction

Purpose

The Electricity Industry Participation Code (Code) sets out the rules for connecting to distribution networks.[1]

The Code requires all distributors to implement a:

- 'queueing and management policy for distributors' (Q&M policy)
- 'clock stop/start mechanism for distributors' (CSSM).

This document (policy) sets out the requirements of the Q&M policy and CSSM.

This policy works in combination with the Code. The Code sets out various requirements for distributors to manage connections, including requirements to:

- have connection and operating standards (which include the Q&M policy and CSSM)
- prioritise and manage final applications in accordance with the Q&M policy
- adhere to the Q&M policy when making decisions on the priority positions of projects at the same network location.

Policy objectives

This policy:

- brings clarity and national consistency to the network connections process by establishing a single, clear policy that applies to all distributors
- speeds up the connection process by improving efficiencies in the planning, preparation and processing of connection applications by applicants and distributors
- enables realisation of network and system benefits by improving prioritisation and scheduling of new connections and network upgrades, and ensuring slow movers don't hold up fast movers or consume scarce resources
- creates greater transparency and accountability at all stages of the connection process for both distributors and applicants.

Policy scope

This policy sets requirements for processing the connection of projects from initial application until they are either commissioned or removed from the network connections pipeline.

[1] See Electricity Industry Participation Code 2010 | Electricity Authority.

Table 1: Policy scope

TYPE	SIZE	CODE PROCESS	APPLICABLE ELEMENTS OF POLICY
Distributed generation (DG) applications	≤10 kW (small)	Processes 1 and 1A of Schedule 6.1	None[2]
	>10 kW and <300 kW (medium)	Process 2 of Schedule 6.1	Clock stop-start mechanism Priority position
	≥300 kW (large)	Process 3 of Schedule 6.1	Clock stop-start mechanism Priority position Milestones Information publication
Load applications	>69 kVA and <500 kVA (medium)	Process 4 of Schedule 6.1	Clock stop-start mechanism Priority position
	≥500 kVA (large)	Process 5 of Schedule 6.1	Clock stop-start mechanism Priority position Milestones Information publication

Applicants with hybrid projects (ie, those with both distributed generation and load connecting at the same ICP) should make only a single application. Whichever element of the project has the higher connection capacity should determine the categorisation of the combined application. For example, an applicant developing a 20 MVA data centre co-located with a 10 MW solar farm would only submit an application for a 'large' load project. This ensures that all elements of the project progress together. The priority position of hybrid applications is covered in more detail in section 4.

Policy provisions – terminology

1. The policy defines:
    a. **small distributed generation** as distributed generation projects or applications with a maximum export power of 10 kW or less in total
    b. **medium distributed generation** as distributed generation projects or applications with a maximum export power of above 10 kW and below 300 kW in total
    c. **large distributed generation** as distributed generation projects or applications with a maximum export power of 300 kW or more in total
    d. **medium load** as load projects or applications above 69 kVA and below 500 kVA
    e. **large load** as load projects or applications at 500 kVA or above.

2. Unless specified otherwise, terms have the meaning given to them in the Code.

[2] The Code allows the Q&M policy to impose criteria that must be satisfied before an application can be approved. However, this iteration of the Q&M policy does not impose any such criteria (since the requirement for specific milestones only applies after final approval has been granted). As such, the current Q&M policy does not apply in relation to small distributed generation applications.

This policy considers:

- applications for new connections
- applications to relocate a connection
- applications to increase the capacity of existing connections.

The document does not consider:

- applications to decommission connections
- applications to downgrade the capacity of existing connections.

Policy commencement

This policy comes into effect:

- for distributed generation projects, on 1 December 2026
- for load projects, on 1 June 2027.

Policy structure

This policy:

- sets out policy provisions in blue boxes
- includes informative text/guidance.

Policy content

This policy includes the following sections:

1. **Project stages** – outlines the stages of the connection process, including the points at which a project arrives at or leaves the relevant stages
2. **Clock stop/start mechanism (CSSM)** – outlines how and when the specified maximum timeframes (relating to submitting and processing initial, interim and final applications) can be stopped and restarted
3. **Priority position** – outlines how distributors must prioritise applications, and how these priority positions inform how distributor resources should be allocated and how network access terms should be set between competing applications
4. **Milestones** – outlines how distributors must set and apply default milestones for large projects with final approval, in order to better progress 'ready' projects, promote accountability, and enable better resource planning by distributors
5. **Information publication** – outlines when, how and what information distributors must publish to improve the transparency of the network connections pipeline and enable better planning and decision making by current and potential applicants
6. **Other matters** – outlines how the policy will be reviewed and updated, and how disputes will be handled.

The policy also contains several appendices:

- **Appendix 1: Diagrammatic overview of policy elements** – outlines how and where elements of Q&M policy and CSSM fit and interact
- **Appendix 2: Combined Q&M policy/CSSM provisions –** collates specific policy provisions in single section
- **Appendix 3: Compliance matrix** – checklist to ensure policy requirements outlined in Electricity Authority's Code amendment decision paper have been met
- **Appendix 4: Worked example** – illustrates how this policy would apply to a fictional scenario.

2. Project stages

There are five core project stages in the Code, being:

- initial application stage
- interim application stage
- final application stage
- construction stage, which for the purposes of this Q&M policy is split into two sub-stages:
    - construction (negotiation) stage
    - construction (delivery) stage
- connected stage.

Depending on the stage, there can be multiple triggers that can cause a project to leave a stage and enter the subsequent stage (or be removed from the pipeline, including the relevant stage, altogether).

For the initial, interim and final application stages, projects only enter the stage when a complete application is submitted. The Code sets out what information is required for each type of application. If a distributor considers that an application is incomplete, the project will remain in the previous stage.

These stages are relevant to the several elements of the Q&M policy because:

- a project that has had its specified maximum timeframe paused under the clock start/stop mechanism cannot advance to the next stage until the clock is restarted (see section 3)
- a project's priority position is determined first by the stage it is in, and then by the date at which it arrived at that stage (see section 4)
- information publication requirements include information about project stages (see section 6).

Policy provisions – project stages

3. The connection process contains the stages as set out in the table below:

Stage	Projects enter stage when:	Projects leave stage and progress to next stage when:	Projects are removed from the network connections pipeline when:
Initial application stage	• The applicant submits a completed initial application	• The applicant submits a completed interim application, or • The applicant submits a completed final application (where no interim application is required)	• The distributor declines the initial application, or • The applicant fails to make an interim or final application within Code timeframes (and a longer timeframe is not agreed), or • The applicant advises the distributor it is removing its application

Stage	Projects enter stage when:	Projects leave stage and progress to next stage when:	Projects are removed from the network connections pipeline when:
Interim application stage	• The applicant submits a completed interim application	• The applicant submits a completed final application	• The distributor declines the interim application, or • The applicant fails to make a final application within Code timeframes (and a longer timeframe is not agreed), or • The applicant advises the distributor it is removing its application
Final application stage	• The applicant submits a completed final application	• The distributor approves the final application	• The distributor declines the final application, or • The applicant advises the distributor it is removing its application
Construction (negotiation) stage	• The distributor approves the final application	• The applicant and the distributor enter into a connection contract, or • For large distributed generation projects connecting on regulated terms, the applicant and the distributor sign a milestone agreement, or • For medium distributed generation projects connecting on regulated terms, the applicant: ○ gives notice that it will not enter into a connection contract, or ○ fails to give notice of its intent to negotiate a connection contract within Code timeframes (and longer timeframe not agreed), or ○ fails to enter into a connection contract within Code timeframes (and longer timeframe not agreed)	• The applicant advises the distributor it no longer wishes to proceed with the connection, or • For large distributed generation projects connecting on regulated terms, the applicant and the distributor fail to sign a milestone agreement within the Code timeframes for connecting the project
Construction (delivery) stage	• The applicant and the distributor enter into a connection contract, or	• The connection is commissioned	• The distributor lapses the project's final approval for consistently failing to

Stage	Projects enter stage when:	Projects leave stage and progress to next stage when:	Projects are removed from the network connections pipeline when:
	• For large distributed generation projects connecting on regulated terms, the applicant and the distributor sign a milestone agreement, or • For medium distributed generation projects connecting on regulated terms, the applicant: ○ gives notice that it will not enter into a connection contract, or ○ fails to give notice of its intent to negotiate a connection contract within Code timeframes (and longer timeframe not agreed), or ○ fails to enter into a connection contract within Code timeframes (and longer timeframe not agreed)		meet or failing to renegotiate milestones, or • The applicant and the distributor fail to connect the project within Code timeframes (and a longer timeframe is not agreed), or • The applicant advises the distributor it no longer wishes to proceed with the connection
Connected stage	• The connection is commissioned	N/A	• 6 months have elapsed from the date of commissioning

3. Clock stop/start mechanism

Specified maximum timeframes

The Code specifies maximum timeframes in which:

- a distributor must notify an applicant of its decision on an application
- an applicant must submit an application.

A high-level summary[3] of these timeframes is set out in Table 3 below, including:

- the party to which the timeframe applies
- the obligation to which the timeframe applies
- the length of the timeframe, and from when it commences (ie, when the clock starts)
- where in the Code the timeframe is specified.

Table 2: Summary of specified maximum timeframes

PARTY	OBLIGATION	SPECIFIED MAXIMUM TIMEFRAME	CODE REFERENCE
Distributor	Decide initial application	**40 business days** from date completed initial application received	Appendix 2, clause 6(1) Appendix 3, clause 6(1) Appendix 4, clause 6(1) Appendix 5, clause 6(1)
Applicant	Submit interim application (if necessary)	**12 months** from date initial application approved, unless distributor agrees to accept interim application after this date	Appendix 3, clause 7(1) Appendix 5, clause 7(1)(d)
Distributor	Decide interim application (if necessary)	**45-80 business days** (depending on project size and type, and subject to extensions) from date completed interim application received	Appendix 3, clause 10(1)(a)-(c) Appendix 5, clause 10(1)(a)-(c)
Applicant	Submit final application	**90 business days** from date interim application approved or **12 months** from date initial application approved (if no interim application needed), unless distributor agrees to accept interim application after this date	Appendix 2, clause 7(1) Appendix 3, clause 12(1) Appendix 4, clause 7(1)(d) Appendix 5, clause 12(1)(e)
Distributor	Decide final application	**20-45 business days** (depending on project size and type, and subject to extensions) from date completed final application received	Appendix 2, clause 11(1) Appendix 3, clause 16(1)(a)-(c) Appendix 4, clause 10(1) Appendix 5, clause 15(1)(a)(c)

Specified maximum timeframes may be extended in certain circumstances, as specified in the Code.

[3] These specified maximum timeframes are also added to the connection process summary diagram in Appendix 1: Diagrammatic overview of policy elements. Note also that the Code requires distributors to keep records of each application and notice received for a minimum of 60 months, including how long it took to approve or decline applications, and the number and length of extensions sought.

Applying the clock start-stop mechanism (CSSM)

The CSSM is designed to be used when a distributor or applicant is unable to process or submit (as the case may be) an application due to factors outside of its control. This could include awaiting information from a third party (eg, a network study), a force majeure event, or similar. When the clock is stopped, the timeframes to complete tasks also pause. This ensures parties are not being penalised for events beyond their control.

For clarity, this means that the CSSM cannot be used:

- after final approval is granted – the CSSM cannot be used to stop the clock for later obligations (such as milestones), only for submitting/deciding an application
- for external factors that do not affect the relevant application – for example, although environmental approvals, property rights, etc. will be relevant to the project at a later stage, applicants do not need these in place to submit an application, and distributors do not need these in place to decide an application. Therefore, a lack of information from a third party about such factors would not be a valid reason to stop the clock.

The distributor is responsible for stopping and restarting the clock by notifying the applicant in writing that it is doing so (including when the applicant has asked that the clock be stopped).[4] The distributor is also responsible for recording the dates on which it stops and restarts the clock. However, it must do so based on a reasonable consideration of the circumstances, and as soon as it is reasonable (where it is in the applicant's interest for the clock to be stopped or restarted, depending on the obligation to which it relates).

Note that some of the specified maximum timeframes in the Code are measured in business days and others in months or years, which do not always align. For example, from being granted initial approval an applicant has 12 months to submit its interim application, regardless of how many days in that period are business days. However, in all cases, the elapsed time when the clock was stopped should always be measured in business days. For example, if the clock is stopped for exactly 2 calendar months (which in this case means 40 business days elapse), the deadline for submitting the interim application should be deferred by exactly 40 business days (even if this equates to slightly more or less than 2 calendar months at the time).

[4] It is important that a single party is responsible for stopping and restarting the clock, to avoid confusing or 'stalemate' situations where one party stops the clock and the other party simply restarts it again.

Policy provisions – clock stop/start mechanism

Background

4. The **specified maximum timeframe** is the maximum time set out in the Code for:
    a. a distributor to decide an initial, interim or final application; or
    b. an applicant to submit an interim or final application.

5. The **clock** is the measurement of elapsed number of business days since the relevant Code obligation was triggered, less the elapsed number of business days during which the clock was stopped.

6. A distributor must:
    a. record the date on which the clock is started, stopped and restarted; and
    b. calculate elapsed clock business days; and
    c. make this information readily available to the applicant upon request.

7. Where the distributor notifies the applicant in writing that it is starting, stopping or restarting the clock after 5:00pm on a business day or at any time during a non-business day, the clock will be deemed to have started, stopped or restarted on the following business day.

8. A project cannot advance to the next stage of the connection process if the clock is stopped.

Stopping/restarting the clock for distributor obligations

9. Clauses 10 to 13 below apply in relation to a distributor's obligation to decide an applicant's initial, interim or final application.

10. The distributor may stop the clock (by notifying the applicant in writing that it is doing so) if it reasonably considers that it cannot decide the application due to any factor(s) outside of its control, such as awaiting information from a third party or a force majeure event.

11. If it is later determined that it was not reasonable for the distributor to stop the clock:
    a. until a later date, then the clock will be deemed to have stopped at said later date; or
    b. at all, then the clock will be deemed not to have stopped.

12. The distributor must restart the clock (by notifying the applicant in writing that it is doing so) as soon as the distributor reasonably considers that the factor(s) referred to in clause 10 above are no longer:
    a. preventing the distributor from deciding the application; or
    b. outside of the distributor's control.

13. If it is later determined that the distributor should have reasonably restarted the clock at an earlier date, the clock will be deemed to have restarted at said earlier date.

Stopping/restarting the clock for applicant obligations

14. Clauses 15 to 19 below apply in relation to the applicant's obligation to submit its interim or final application.

15. Following a request from the applicant, the distributor must stop the clock (by notifying the applicant in writing it is doing so) as soon as the distributor reasonably considers that the applicant cannot submit its application due to any factor(s) outside of its control, such as awaiting information from a third party or a force majeure event.

16. If it is later determined (via the relevant dispute resolution process) or agreed (between the applicant and the distributor) that the distributor should have reasonably stopped the clock at an earlier date, the clock will be deemed to have stopped at said earlier date.

17. The applicant must notify the distributor in writing as soon as the applicant is aware that the factors referred to in clause 15 above are no longer:
    a. preventing the applicant from submitting its application; or
    b. outside of the applicant's control.

18. The distributor must restart the clock (by notifying the applicant in writing it is doing so) as soon as it receives notification from the applicant pursuant to clause 17 above.

19. If it is later determined (via the relevant dispute resolution process) or agreed (between the applicant and the distributor) that the applicant should have notified the distributor at an earlier date, the clock still be deemed to have restarted at said earlier date.

4. Priority position

Applications are assigned a priority position when an applicant submits a completed initial application and retain a priority position (which can change) until the project is connected or the application is declined by the distributor or withdrawn by the applicant.

The priority positions of projects form a 'queue', which impacts the order in which distributors allocate resources[5] and set network access terms.

A distributor can choose whether to establish:

- a single queue for all projects
- separate queues for medium vs. large projects, and/or distributed generation and load projects.

Where there is a single queue, different types of projects may still be treated differently. For example:

- as discussed in more detail below, distributors may allocate resource to lower priority projects ahead of higher priority projects where practical and efficient to do so (including based on project type or size)
- different obligations apply to certain project types – for instance, milestones and publication requirements are only necessary for large projects (see sections 5 and 6).

Where there are separate queues and prioritisation issues arise between two projects in different queues, then the issue should be resolved by determining what the respective priority positions would be if the projects were in the same queue – ie, based on the stage of the project is in and the date it arrived at that stage (as set out in the following section).

Similarly, where a combined hybrid application is in a single queue based on the larger of its two projects (for example, where a single application for a large load project and a smaller distributed generation project is in the load queue), then:

- if the hybrid application no longer wants to proceed with the larger project, the remaining project can be moved to the other queue (if appropriate)
- if the smaller project is competing for network access terms with projects in the other queue, this should be resolved by working out what the priority position would have been if the two projects were in the same queue.

How priority position is set

Priority positions are set firstly, by the **stage the project is in**. Projects in later stages will always have a higher priority position than projects in earlier stages. This makes the process more efficient by prioritising the connection of projects that are more developed and therefore likely to be completed sooner.

[5] Distributor resource could include administration, project management, engineering, construction and other resources, provided by either the distributor directly or external contractors managed by the distributor.

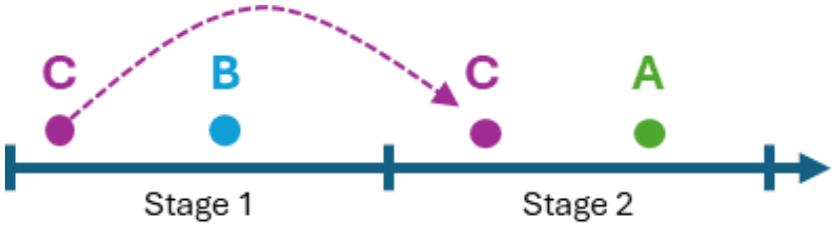
Where there are multiple projects in the same stage, the priority position of a project is assigned based on its **order of arrival** to that stage. For example, if three projects are in the 'initial application' stage with priority positions of 15, 16 and 17, then the next project entering that stage will be assigned a priority position of 18.

For projects that are already in the network connections pipeline when the Q&M policy comes into effect, distributors may choose whether to assign them a priority position and queue and manage them under this policy, or to continue to treat them under the distributor's existing arrangements.

An application's priority position can change (therefore also affecting the priority position of other projects) when it moves to a new stage. This is illustrated in the example described below and in Figure 1:

- Project B enters Stage 1 before Project C, so initially has a higher priority position than Project C
- Because Project C satisfies the requirements to move to Stage 2 before Project B,[6] it 'overtakes' Project B in the queue
- Project A has a higher priority position than Project B (because it is at more advanced stage) and Project C (because it arrived at its current stage before Project C).

Figure 1: Stylised example of changing priority position



During the construction (delivery) stage, a large project's priority position can also change (again, affecting the priority position of other projects) if it fails to meet its milestones and accordingly the distributor, acting reasonably, determines its priority position should be reduced. This is discussed in more detail in section 5.

Policy provisions – assigning priority position

20. A distributor must assign a priority position to a project when the applicant submits a completed initial application. Distributors may choose whether projects that have already submitted an initial application before the policy comes into effect should be assigned a priority position under the policy or continue to be treated under any previous arrangements.

[6] This could be, for example, because Project C is a relatively simple application or is a resubmission of a previous application, or because Project B has stopped the clock using the CSSM.

21. A distributor must assign a project's priority position as follows:
    a. firstly, projects in more advanced stages of the connection process must be assigned higher priority positions than projects in earlier stages
    b. secondly, where there are multiple projects in the same stage of the connection process, projects must be assigned a priority position that reflects the order they arrive at that stage (unless the distributor determines that, during the construction (delivery) stage, a large project's priority position should be reduced due to the applicant missing a milestone).

22. When a project moves from one stage to another or otherwise has its priority position updated, the distributor must, where necessary, update all other relevant projects' priority positions.

How priority position affects applications

Depending on the stage the project is in, distributors can use a project's priority position in different ways.

Initial application and interim application stages

During these early stages of the application process, priority position can be used to:

- indicate to distributors how they should allocate their resources during the processing of applications
- indicate to applicants the network access terms they are likely to receive if they retain their priority position until final approval is granted (see following section).

Distributors should generally aim to process initial and interim applications in the order they are received (ie, allocate processing resources to applications based on their priority position).[7] However, due to various practicality or efficiency-related reasons, distributors will not necessarily complete the assessment of a project with higher priority position before a project with lower priority position.

Practicality and efficiency-related reasons can include that:

- processing applications can involve various lead times, so it would be inefficient to work solely on processing one application (from submission to decision) before moving to the next. Instead, it is more practical to process multiple applications in parallel
- the maximum timeframes specified in Part 6 of the Code (see section 3 above) already create a de facto queue for assessing applications. These timeframes begin when a completed application is submitted, so assuming no extensions are given, the deadline for deciding an earlier submitted application will likely be before the deadline for deciding a later submitted application

[7] Note that the Code also requires distributors to "act reasonably and process applications received under this Part without undue delay".

- complex applications that take longer to process may need to be prioritised ahead of earlier, simpler applications so the distributor can process all applications within their maximum specified timeframes
- distributors may find it is more efficient to have separate processes for dealing with certain types of applications (eg, separate teams for processing distributed generation vs. load applications, or some kind of 'fast-track' process for simple medium-sized applications). This could result in certain applications being processed ahead of other higher-priority applications where one process has different resourcing practicalities than another, for example, specific staff being away
- some applications could be resubmissions of previous applications that were previously removed from the pipeline – for example, if an applicant failed to meet a relevant obligation within the specified maximum timeframe during the initial application or interim application stages (see section 3 above) or consistently missed milestones post-approval (see section 5 below). If an interim application is required, resubmitting applicants may also submit initial and interim applications together. Where resubmitted applications have not changed materially, it may be efficient to process them quickly, even if this means expediting them ahead of other applications with higher priority positions
- some complementary projects (for example, those that share certain network assets or hybrid projects with both load and generation applications) will require distributors to undertake similar work for each application. In such cases, it would be efficient to process these applications simultaneously, despite differing priority positions.

Policy provisions – effect of priority position during initial and interim application stages

23. During the initial application and interim application stages, a distributor must take into account projects' priority positions when allocating distributor resources to applications (noting that distributors may still consider practical or efficiency factors when allocating distributor resources).

Priority position during these early stages can also indicate how likely the project is to receive preferential network access terms. Network access terms are granted based on priority position during the final application stage (see following section), and projects with a high priority position are likely to reach this stage ahead of lower priority projects because they:

- would have submitted initial/interim applications before lower priority projects, so these applications would have had more time to be processed by the distributor
- will likely be allocated more distributor resource, and therefore their initial/interim applications will likely be processed more quickly than lower priority applications
- therefore, will likely receive initial/interim approval ahead of lower priority projects.

However, at this stage of the process, priority position is *only indicative* of the order in which projects reach the final application stage. Lower priority projects may still overtake higher priority projects before this point, for example because:

- the distributor may process the lower priority project's initial/interim applications more quickly – eg, for the practicality/efficiency-related reasons discussed above

- the applicant may prepare the lower priority project's final application more quickly.

This likelihood of a project receiving preferential network access terms is communicated through the publication of the network connections pipeline information, which includes projects' priority positions (see section 6).

Final application stage

During the final application stage, priority position can be used to determine the terms on which a project is granted access to the network – ie, to ensure that the project can be safely and securely connected and coordinated.[8] For example, if a relevant part of the network has limited capacity, these network access terms could include requirements to:

- pay for network upgrades[9]
- agree to be constrained off ahead of other connections if congestion occurs
- downsize the project
- operate more flexibly, such as by restricting offtake/injection to within a dynamic operating envelope.[10]

When projects are competing for network access terms, preferential terms must be granted to the higher priority project.

As with all stages, priority position during the final application stage is determined by the order at which projects arrive at this stage. This means that network access terms are essentially granted on a first-in, first-served approach,[11] noting that:

- the project may (where relevant) have needed to first obtain interim approval, which will generally involve conducting detailed network studies and considering various connection pathways
- final applications must be complete – if an application does not include all necessary information or the applicant has not paid the relevant application fee, the project will not enter the final application stage until this is rectified

[8] Some networks may consider that a project 'reserves capacity' at this point in the connection process. However, this term is not used in this policy as other networks may consider that network capacity is never 'reserved' and future congestion is more actively managed in the future (ie, based on price, generation/load type or some other factor, and not simply on a first-in basis).

[9] Subject to connection pricing requirements for load in Part 6B of the Code, which in some cases regulate how distributors can charge for network upgrades. Pioneer scheme requirements may also affect the kind of network access terms that can be granted.

[10] Note that precisely how a distributor's network access terms are granted will also depend on their commercial and operational policies and standards, including on matters such as connection pricing and congestion management.

[11] There is no requirement to group applications made at similar times. Previously, the Code allowed distributors to consider applications made within 20 business days of each other as "as if they were competitive bids" and required distributors to consider these applications "in light of the purpose of Part 6 of this Code". This was replaced in 2025 by a requirement to simply "prioritise and manage final applications in accordance with the queueing and management policy for distributors".

- the applicant's final application must still be approved – if an application fails to meet the distributor's operational and commercial standards and policies, it will not be approved, and the applications priority position will be irrelevant
- the applicant should be confident it will be able to agree on and satisfy various milestones – as discussed in section 5 below, a distributor may amend a project's network access terms if the applicant consistently misses milestones that demonstrate genuine project 'readiness'.

In addition, priority position should also be used to indicate to distributors how they should allocate their resources during the processing of final applications (in the same way as for initial and interim applications).

Policy provisions – effect of priority position during final application stage

24. During the final application stage, a distributor must:
    a. take into account projects' priority positions when allocating distributor resources to applications (noting that distributors may still consider practical or efficiency factors when allocating distributor resources)
    b. grant network access terms in accordance with projects' priority positions (provided it meets the distributor's operational and commercial standards and policies).

Construction stages

During the construction (negotiation) and construction (works) stages, distributors must consider a project's priority position when allocating resources.

In practice, a distributor will apply a project's priority position when:

- a distributor is negotiating (or renegotiating) the timeframes for the distributor's delivery obligations under a connection contract or other agreement. For example, if more than one project requires the distributor to undertake electrical engineering work to deliver a connection, and these resources are constrained, then the distributor should draft the contract timeframes to accommodate the electrical engineering resources working on the project with the higher priority position first.
- a distributor has discretion as to how it allocates resources (ie, where not specified in a connection contract or other agreement). For example, if a construction crew becomes available earlier than expected and could be directed to work on one of several other projects (even though the distributor's construction obligations for those other projects are not contractually required until a later date), the distributor should direct this resource to work on the project with the highest priority position.

As during the initial and interim application stages, a project's priority position is not entirely determinative of the distributor resources it will be allocated. Distributors can and should also consider practicality or efficiency-related factors (as previously discussed under the "initial application and interim application stage" section above).

Policy provisions – effect of priority position during construction stage

25. During the construction (negotiation) stage and construction (delivery) stage, a distributor must take into account projects' priority positions when agreeing or amending any contractual terms affecting the allocation of distributor resources or allocating any discretionary distributor resources to project delivery (noting that distributors may still consider practical or efficiency factors when allocating distributor resources).

Connection stage

Once the project is connected, its priority position is no longer relevant.

5. Milestones

Milestones are specific criteria that applicants must meet within specified timeframes to demonstrate that their project is proceeding in a timely manner. They allow a distributor to assess a project's progress, and to intervene where projects are not making sufficient progress. This:

- allows distributors to reprioritise resources, enabling progression of faster moving projects, without detriment to delayed projects
- mitigates the risk of approved projects with preferential access terms failing to progress toward commissioning, therefore preventing other projects from connecting on preferential terms.

The Code only requires milestones to be in place for large distributed generation and load projects. This is because small and medium projects will likely:

- take up fewer distributor resources during the construction (delivery) stage, so resource prioritisation is less important
- use less network capacity, so have less of an impact on other projects' network access terms.

Setting milestones

The policy includes a list of default milestones that relate to final design, property rights, environmental approvals, Overseas Investment Office approval, Electricity Authority and Transpower (as system operator and/or grid owner) approvals, supplier and construction contracts, finance, final investment decision, construction, and final commissioning.[12]

The purpose of these default milestones is to ensure that applicants know what kind of milestones they may have to satisfy. Distributors cannot impose additional milestones (unless the distributor can reasonably demonstrate that an additional milestone is required). The parties can also agree that no milestones are required.

The applicant and the distributor must agree (acting reasonably) which of the default milestones apply and the relevant details of each, including the precise criteria that must be satisfied (for example, whether documented evidence must be provided or whether director or executive signoff is sufficient) and the date by which they must be met. These details must be recorded in the

[12] The 'commissioning' milestone is also effectively incorporated into the Code, as distributors may lapse a project's final approval if the applicant fails to connect to the distributor's network within 2 years from the date of final approval (or by the date agreed with the distributor, whichever is later). Achieving this milestone also represents the end of the connection process, and the Q&M policy ceases to apply (with the exception of information publication requirements, which continue for a further 6 months).

connection contract between the parties or, if a project is proceeding without a connection contract, in a separate 'milestone agreement'.[13]

The parties may also agree to include interim milestones. Interim milestones are steps that need to be taken before the relevant default milestone can be met. They could include, for example, obligations to begin certain processes (eg, submitting a resource consent application) or having conditional agreements in place (eg, a conditional finance agreement).

Policy provisions – setting milestones

26. For the purposes of clause 27 to 30 below, the default milestones and relevant criteria are set out in the table below:

Default milestones	Default criteria
Final design	The applicant must have finalised all necessary design plans for the project
Property rights	The applicant must have secured all necessary property rights to complete the project
Environmental approvals	The applicant must have secured all necessary environmental approvals to complete the project
Overseas Investment Office approval	The applicant must have secured all necessary Overseas Investment Office approvals to complete the project
Electricity Authority and System Operator approvals	The applicant must have secured all necessary Electricity Authority and System Operator approvals to complete the project
Supplier and construction contracts	The applicant must have secured all necessary supply and construction arrangements to complete the project
Finance	The applicant must have secured all necessary finance arrangements to complete the project
Final investment decision	The applicant must have reached a formal decision to proceed with the project
Construction	The applicant must have commenced work to construct the project
Commissioning	The applicant must completed commissioning activities and be able to operate at its maximum export power/load capacity

27. For each of the default milestones listed in clause 26 above, the applicant and the distributor must set out (either in a connection contract or a separate milestone agreement):
    a. whether the default milestone applies
    b. any additional details or amendments to the default criteria, including how the milestone will be deemed to have been satisfied
    c. any interim milestones that apply, including relevant criteria

[13] 'Connection contract' is not defined in the Code but is considered to be a contract that sets out the terms of connecting to the network and the operating terms that will apply once the connection is live. A contract that covers these terms is deemed to be a connection contract even if it is called something else.

d. the timeframe in which the default milestone and any interim milestones must be satisfied.

28. The connection contract or milestone agreement must not include any milestones that are not listed in clause 26 above unless the distributor can demonstrate that the milestone (and associated criteria and timeframe) is necessary to ensure that the wider connection process is efficient and equitable.

29. An applicant and distributor must act reasonably when negotiating whether to include, and if so, the details of:
    a. default milestones
    b. any additional milestones.

30. When acting reasonably in accordance with clause 29, an applicant or distributor must, where necessary, consider:
    a. the nature of the project and how long it is expected to take
    b. the applicant's actions in previous stages of the connection process and its record for developing other projects
    c. the interactions with other terms of the connection contract, milestone agreement or any other agreement, including:
        i. other milestones that have been included or excluded
        ii. obligations on the distributor
    d. other projects in the network connections pipeline, including those that may compete with the project for:
        i. distributor resource
        ii. preferential network access terms.

Applying milestones

If a project successfully meets its milestones on time, it continues with the connection process normally.

However, if a project misses a milestone (or is likely to miss a milestone), the applicant will need to renegotiate that milestone with the distributor – amending either the milestone timeframe (ie, the date on which it is due) or the milestone criteria (ie, what needs to be demonstrated for the milestone to be satisfied), or both.

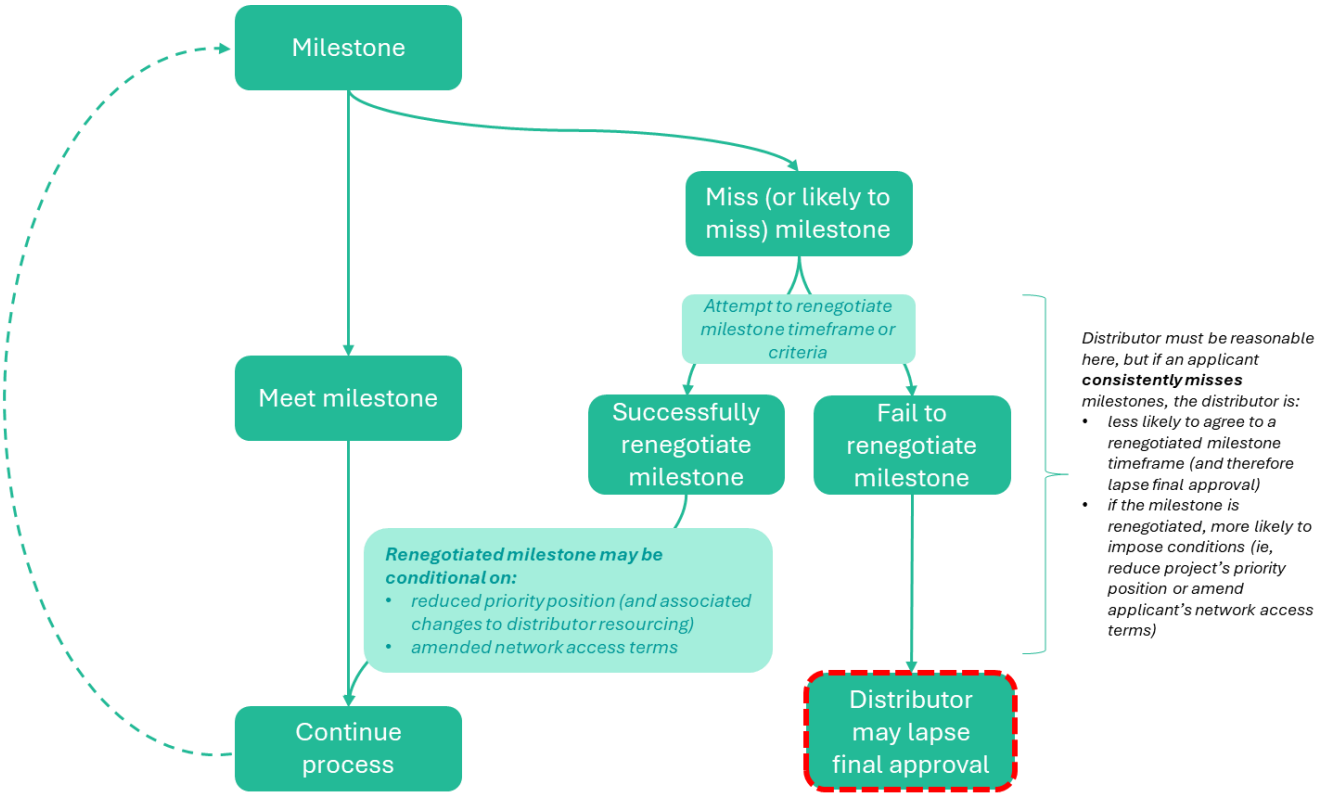
If the applicant fails to renegotiate the milestone (with the distributor acting reasonably), then the distributor can lapse the project's final approval by written notification and remove it from the pipeline. It would then need to successfully reapply, starting with an initial application.[14] Even if the project successfully obtains final approval, this new approval may be on less preferential terms (as other projects may have been granted final approval in the meantime).

[14] However as noted previously, if circumstances have not materially changed, the same applications could likely be resubmitted and the project could advance quickly through the process (including potentially skipping the interim application), possibly overtaking other projects.

On the other hand, even if the milestone is renegotiated, not meeting the original milestone may still have consequences. They distributor may choose (again, acting reasonably) to only agree to a renegotiated milestone on the condition that:

- the project's priority position is reduced, potentially affecting how distributor resources will be allocated to the project during the rest of the connection process
- the access terms on which the project can connect to the network are amended.[15]

Figure 2: Outline of milestone process



The key restriction on a distributor's ability to reduce a project's priority position, amend a project's network access terms, or lapse final approval is that the distributor must act reasonably throughout the process. This involves considering a range of applicable factors (as set out in policy provision 37). A key factor is whether the applicant has previously missed or had to renegotiate this milestone, and if so, how many times. If a project has consistently missed milestones, it is more likely to be reasonable for a distributor to lapse its final approval.

It is unlikely it would be reasonable for a distributor to lapse a project's final approval for missing only a single milestone. However, this could be possible – for instance, if an applicant missed a key

[15] Both parties must agree to reduce a project's priority position or amend its network access terms must be agreed by both parties. However, the distributor has more negotiating power, as if an applicant refuses to agree to such conditions the distributor may refuse to agree to the renegotiated milestone and accordingly lapse the project's final approval (provided it does so reasonably).

milestone and refused to engage in discussions about how the milestone could be reasonably renegotiated.

Similarly, it is unlikely that it would be reasonable for a distributor to lapse a project's final approval due to factors outside of its control, but again, in some cases this could be reasonable – for instance, if a project has not received resource consent due to an external factor that is unlikely to be resolvable.

Policy provisions – applying milestones

31. Where the distributor's obligations may impact the applicant's milestones, the distributor must complete these milestones and provide the applicant with relevant information in a timely manner.

32. Where an applicant misses a milestone or is likely to miss a milestone, the applicant and the distributor may, by mutual agreement, renegotiate the milestone timeframe or milestone criteria.

33. As a condition of agreeing to amend the milestone timeframe or milestone criteria, the distributor may require that:
    a. the project's priority position be reduced, and any terms of the distributor's contractual obligations be amended in so far as they reflect this change in priority position
    b. the network access terms on which final approval was granted be amended.

34. Where an applicant fails to renegotiate a missed milestone, the distributor may lapse the project's final approval by notifying the applicant in writing that it has done so.

35. An applicant can be considered to have failed to renegotiate a missed milestone if it:
    a. fails to engage in negotiation 5 business days after the distributor notifies the applicant in writing that it has missed the milestone deadline, or
    b. fails to agree to amend the milestone timeframe or milestone criteria 15 business days after the distributor notifies the applicant in writing that it has missed the milestone deadline.

36. A distributor must act reasonably when deciding:
    a. whether to agree to amend a milestone
    b. any conditions on a renegotiated milestone
    c. whether to lapse a project's final approval.

37. When acting reasonably in accordance with clause 36, a distributor may consider:
    a. whether the applicant has previously renegotiated this milestone, and if so, how many times, and
    b. whether the applicant has generally met their other milestones on time, and
    c. whether the applicant has demonstrated that it is close to meeting the milestone, and
    d. the degree to which meeting the milestone on time is important for the project to proceed in a timely manner, and
    e. the time the applicant has had to renegotiate the milestone, and

f. the length of any extension to proposed milestone timeframes, and
g. the extent of any change to proposed milestone criteria, and
h. whether there is any other behaviour from the applicant that indicates gaming of the connection process or a lack of intent to progress the project, and
i. the reason(s) the applicant did not or is unlikely to meet the milestone on time, and the degree to which this was within their control, and
j. the extent to which amending the project's milestone timeframes, milestone criteria, priority position, network access terms, or final approval would affect other projects' allocation of distributor resource or network access terms.

38. Where a project's original network access terms resulted in less preferential terms being granted to other projects that gained final approval later in the process, and the distributor amends these network access terms or lapses the project's final approval in accordance with clauses 33 or 34 above (thereby allowing more preferential terms to be offered to these other projects), the distributor should offer these improved terms to other projects in order of their priority position.

39. Where a project's final approval is lapsed, the applicant may reapply by submitting a new initial application for the project.

6. Information publication

The Code requires distributors to publish non-confidential information about large distributed generation and load projects in the connection pipeline. This increases the transparency of the network connections pipeline, which allows developers to see the likely availability of distributor resources and/or network capacity and therefore:

- assess the merits/viability of prospective projects in certain network locations before making an initial application
- adjust/optimise progression through to final approval and delivery.

The Code requires distributors to publish:

- aggregated pipeline information, including:
    - number of large distributed generation applications (in total and by fuel/load type and stage)
    - number of large load applications (in total and by load type and stage)
    - sum of maximum export power for all large distributed generation projects
    - sum of load capacity for all large load projects
- individual application details for both large distributed generation and large load projects, including each project's:
    - priority position
    - maximum export power (for distributed generation) or capacity (for load)
    - fuel type (for distributed generation) or load type (for load)
    - project stage
    - location (zone substation or feeder)
    - date commissioned/connected (where relevant).

In addition to Code requirements, this policy requires distributors to publish:

- for the aggregated pipeline:
    - the sum of maximum export power/load capacity broken down in the same way as application numbers (ie, by fuel/load type and by project stage)
- for individual large applications:
    - the date on which the project entered its current stage
    - whether the relevant application has been approved (for applications in the initial and interim application stages)
    - whether the clock for any specified maximum timeframe has been stopped using the clock stop/start mechanism.

This information must be updated on at least a monthly basis, and additional updates must be made within five business days where there have been material changes to priority positions.

Policy provisions – information publication requirements

40. Distributors must publish on their websites information as to:
    a. the number of large distributed generation projects
    b. the number of large load projects
    c. the sum of maximum export power for all large distributed generation projects
    d. the sum of load capacity for all large load projects.

41. The information published under clause 40 above must be presented:
    a. as an aggregated total
    b. broken down by:
        i. fuel type (for distributed generation) or load type (for load)
        ii. project stage.

42. Distributors must publish on their websites information as to each large distributed generation or large load project's:
    a. priority position
    b. maximum export power (for distributed generation) or capacity (for load)
    c. fuel type (for distributed generation) or load type (for load)
    d. project stage
    e. location (zone substation or feeder)
    f. date on which it entered its current stage
    g. clock status (as relates to the clock stop/start mechanism).

43. Distributors must update the information published about their network connections pipelines (as set out in clauses 40 and 42 above) before the final day of each calendar month (except for December which is to be updated on 22 December or the next business day if 22 December is not a business day).

44. Distributors must display the date on which the published network connections pipeline information was last updated.

The tables below provide stylised examples of how this information should be presented to comply with this policy.

Note that hybrid projects with large distributed generation and large loads will need to have information recorded in both lists under Table 3.

Table 3: Stylised example of aggregate network connections pipeline information

	NO. OF LARGE APPLICATIONS	EXPORT POWER/LOAD CAPACITY
Distributed generation		
By fuel type:		
Wind		
Solar		
Energy storage system		
Other generation		
By stage:		
Initial application stage		
Interim application stage		
Final application stage		
Construction (negotiation) stage)		
Construction (delivery) stage		
Connected stage		
Total distributed generation		
Load		
By load type:		
Transport		
Process heat		
Data centre		
Other load		
By stage:		
Initial application stage		
Interim application stage		
Final application stage		
Construction (negotiation) stage)		
Construction (delivery) stage		
Connected stage		
Total load		

Note that the third column of Table 4 does not include all priority positions. This is because this example uses a single queue for all projects, but publication requirements do not apply to medium projects, even though these have a priority position. These gaps in numbers would not occur where the distributor choses to have a separate queue for large projects.

Table 4: Stylised example of network connections pipeline individual project information

PROJECT NAME (OPTIONAL)	APPLICANT (OPTIONAL)	PRIORITY POSITION	MAX EXPORT POWER / CAPACITY	TYPE	PROJECT STAGE	LOCATION	DATE ARRIVED AT STAGE	APPLICAT-ION STATUS	CLOCK STATUS	INDICATIVE CAPACITY STATUS (OPTIONAL)
Business rooftop solar	Company Ltd	1	0.5 MW	Generation (solar)	6. Connected stage	ZS X	01/05/2026	N/A	N/A	N/A
Red factory	Factory Ltd	3	8 MVA	Load (process heat)	5. Construction (delivery) stage	ZS Y	01/02/2026	N/A	N/A	N/A
Blue wind farm	Wind Ltd	8	10 MW	Generation (wind)	4. Construction (negotiation) stage	ZS Z	15/04/2026	N/A	N/A	N/A
Yellow solar farm	Solar Ltd	16	3 MW	Generation (solar)	4. Construction (negotiation) stage	ZS Z	01/05/2026	N/A	N/A	N/A
[redacted]	[redacted]	22	20 MW	Generation (solar)	3. Final application stage	ZS X	15/04/2026	Submitted	Proceeding normally	🟢
[redacted]	[redacted]	29	2 MW	Generation (BESS)	3. Final application stage	ZS Y	01/05/2026	Submitted	Proceeding normally	🟢
[redacted]	[redacted]	31	25 MVA	Load (data centre)	2. Interim application stage	ZS Z	01/04/2026	Submitted	Proceeding normally	🟢
[redacted]	[redacted]	38	0.5 MVA	Load (other)	2. Interim application stage	ZS X	15/04/2026	Approved	On hold	🟢
[redacted]	[redacted]	40	5 MVA	Load (transport)	2. Interim application stage	ZS Y	01/05/2026	Submitted	Proceeding normally	🟢
[redacted]	[redacted]	46	20 MW	Generation (solar)	1. Initial application stage	ZS Z	01/04/2026	Approved	Proceeding normally	🔴
[redacted]	[redacted]	48	1 MW	Generation (BESS)	1. Initial application stage	ZS X	15/04/2026	Approved	Proceeding normally	🟢
[redacted]	[redacted]	51	15 MW	Generation (other)	1. Initial application stage	ZS Y	01/05/2026	Submitted	Proceeding normally	🟠

Table 4 above also includes several optional fields that could be useful to provide in some contexts, but are not required under this policy. They include:

- project and applicant names – a distributor may decide to publish identifying information about projects/applicants to improve the transparency of the pipeline (likely only for projects beyond a certain stage). This would help applicants further back in the process make their own assessment on the likelihood of a project proceeding (eg, based on the other applicant's track record). However, if a distributor decides to publish such information, that must ensure that it is not considered 'confidential'.[16]
- indicative capacity status – it may also be useful for distributors to publish an indication of whether the project, as currently specified, could be accommodated on the network if all projects with higher priority positions connect. In the example above, this is shown by a traffic light system where, if all projects with a higher priority position proceed:
    - a red circle indicates there is unlikely to be sufficient network capacity for the project to inject or offtake at its maximum capacity
    - an amber circle indicates the project could likely connect with conditions, controls or minor variations to its maximum injection or offtake capacity
    - a green circle indicates the project could likely connect as proposed.

[16] See clause 6.3 of the Code for what information is considered confidential. Note that the applicant can (and must) identify what information in its application is confidential.

7. Other matters

Review and change control

The Q&M policy should be periodically reviewed and amended where necessary (with input from stakeholders), particularly in the first years following its introduction to address any implementation issues.

The policy can also be reviewed and amended on an ad hoc basis where necessary, initiated by the ENA either on its own discretion or in response to a stakeholder request.

Policy provisions – post-implementation review

45. Electricity Networks Aotearoa should review this connection queueing and management policy:
    a. within 12 and 24 months after the policy comes into effect, and
    b. subsequently, on a four yearly cycle

    and may amend the policy because of such review.

46. Electricity Networks Aotearoa may review this connection queueing and management policy outside of the review cycle outlined in clause 45, and may amend the policy because of such review provided that the amendments are:
    a. technical or non-controversial in nature, or
    b. in response to a material issue that has been identified, or
    c. due to a material change in circumstances.

47. Electricity Networks Aotearoa must consult with affected stakeholders as a part of any review of this connection queueing and management policy.

Dispute resolution

Any disputes that arise in relation to provisions in this policy or in the Code should be dealt with in accordance with the dispute resolution mechanisms in the Code:

- Disputes between distributors and applicants that are 'participants' (as defined in the Code) should be dealt with through the dispute resolution process in Schedule 6.3 of the Code
- Where there is a dispute between distributors and applicants that are not participants, the distributor must attempt to resolve the dispute in good faith within 20 business days (noting that the applicant is still able to report a possible breach of the Code to the Authority).

Any disputes that arise in relation to provisions in any connection contract should be dealt with in accordance with any dispute resolution clauses included in said connection contract between the distributor and the applicant.

Policy provisions – dispute resolution

48. Any disputes in relation to this connection and queuing management policy and/or clock start/stop mechanism should be dealt with in accordance with (as appropriate):
    a. the dispute mechanism in Schedule 6.3 of the Code
    b. the standard method for reporting a breach of the Code to the Electricity Authority
    c. dispute resolution provisions in any signed connection contract between the relevant parties.

Non-discrimination

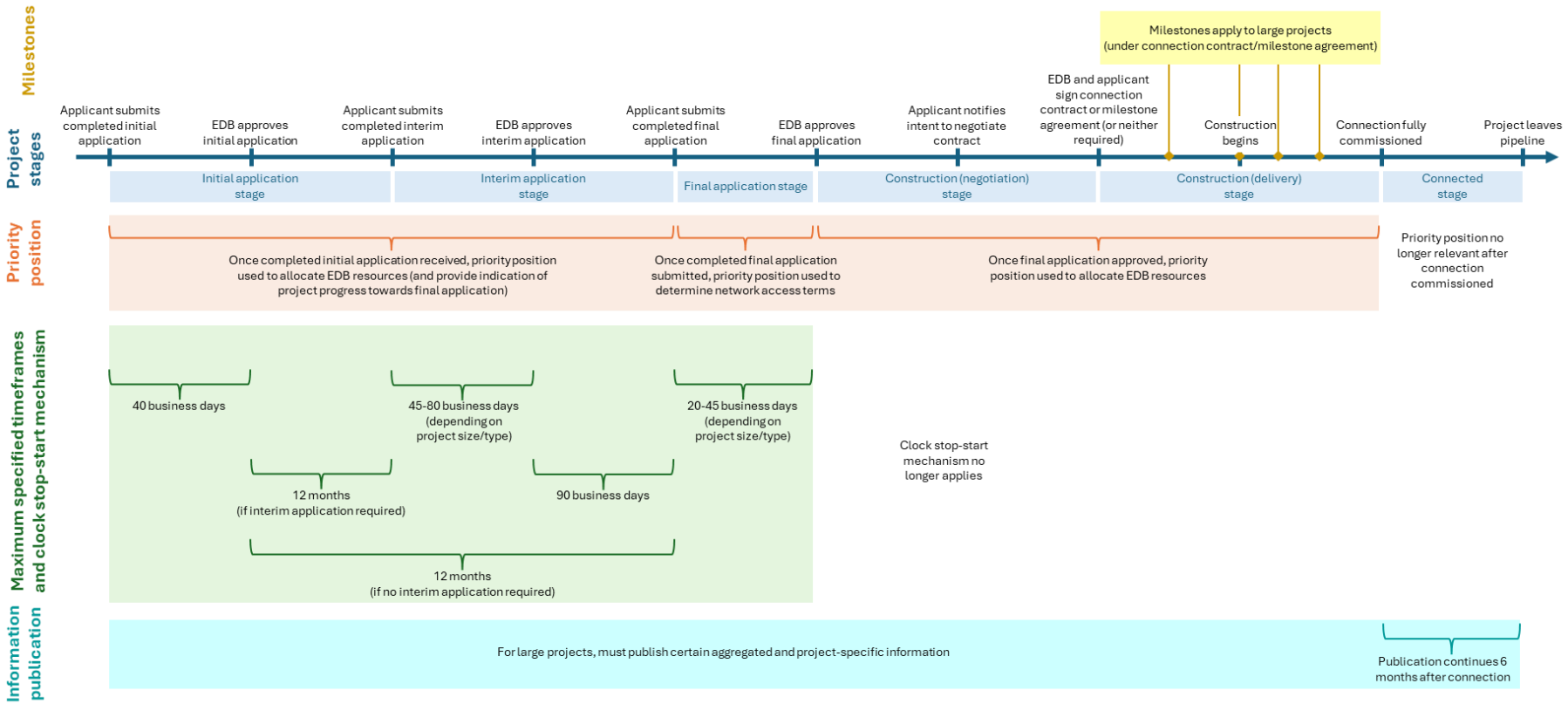
Distributors should act at arm's length when dealing with projects in which they may have a financial interest in. Likewise, they may not discriminate between any other projects based on the project's owner. This applies to all aspects of the connection process, including:

- when processing applications
- when determining whether to stop/start the clock under the CSSM
- when determining a project's priority position
- when allocating distributor resource (including while processing applications and during the construction stage)
- when deciding network access terms
- when negotiating and renegotiating milestones, including deciding how to deal with projects that have consistently missed milestones.

Policy provisions – non-discrimination

49. When queuing and managing projects in accordance with this policy, a distributor must not discriminate based on the ownership of, or beneficial interests in, the applicant, including whether the distributor has an ownership interest or a beneficial interest in that applicant.

Appendix 1: Diagrammatic overview of policy elements



Appendix 2: Combined queueing and management policy and clock stop/start mechanism provisions

Terminology

1. The policy defines:
    a. **small distributed generation** as distributed generation projects or applications with a maximum export power of 10 kW or less in total
    b. **medium distributed generation** as distributed generation projects or applications with a maximum export power of above 10 kW and below 300 kW in total
    c. **large distributed generation** as distributed generation projects or applications with a maximum export power of 300 kW or more in total
    d. **medium load** as load projects or applications above 69 kVA and below 500 kVA
    e. **large load** as load projects or applications at 500 kVA or above.

2. Unless specified otherwise, terms have the meaning given to them in the Code.

Project stages

3. The connection process contains the stages as set out in the table below:

Stage	Projects enter stage when:	Projects leave stage and progress to next stage when:	Projects are removed from the network connections pipeline when:
Initial application stage	• The applicant submits a completed initial application	• The applicant submits a completed interim application, or • The applicant submits a completed final application (where no interim application is required)	• The distributor declines the initial application, or • The applicant fails to make an interim or final application within Code timeframes (and a longer timeframe is not agreed), or • The applicant advises the distributor it is removing its application
Interim application stage	• The applicant submits a completed interim application	• The applicant submits a completed final application	• The distributor declines the interim application, or • The applicant fails to make a final application within Code timeframes (and a

Stage	Projects enter stage when:	Projects leave stage and progress to next stage when:	Projects are removed from the network connections pipeline when:
			longer timeframe is not agreed), or • The applicant advises the distributor it is removing its application
Final application stage	• The applicant submits a completed final application	• The distributor approves the final application	• The distributor declines the final application, or • The applicant advises the distributor it is removing its application
Construction (negotiation) stage	• The distributor approves the final application	• The applicant and the distributor enter into a connection contract, or • For large distributed generation projects connecting on regulated terms, the applicant and the distributor sign a milestone agreement, or • For medium distributed generation projects connecting on regulated terms, the applicant: ○ gives notice that it will not enter into a connection contract, or ○ fails to give notice of its intent to negotiate a connection contract within Code timeframes (and longer timeframe not agreed), or ○ fails to enter into a connection contract within Code timeframes (and longer timeframe not agreed)	• The applicant advises the distributor it no longer wishes to proceed with the connection, or • For large distributed generation projects connecting on regulated terms, the applicant and the distributor fail to sign a milestone agreement within the Code timeframes for connecting the project
Construction (delivery) stage	• The applicant and the distributor enter into a connection contract, or • For large distributed generation projects connecting on regulated terms, the applicant and	• The connection is commissioned	• The distributor lapses the project's final approval for consistently failing to meet or failing to renegotiate milestones, or • The applicant and the distributor fail to connect

Stage	Projects enter stage when:	Projects leave stage and progress to next stage when:	Projects are removed from the network connections pipeline when:

	the distributor sign a milestone agreement, or
	• For medium distributed generation projects connecting on regulated terms, the applicant:
	  ○ gives notice that it will not enter into a connection contract, or
	  ○ fails to give notice of its intent to negotiate a connection contract within Code timeframes (and longer timeframe not agreed), or
	  ○ fails to enter into a connection contract within Code timeframes (and longer timeframe not agreed)
			the project within Code timeframes (and a longer timeframe is not agreed), or
			• The applicant advises the distributor it no longer wishes to proceed with the connection

Connected stage	• The connection is commissioned	N/A	• 6 months have elapsed from the date of commissioning

Clock stop/start mechanism – background

4. The **specified maximum timeframe** is the maximum time set out in the Code for:
    a. a distributor to decide an initial, interim or final application; or
    b. an applicant to submit an interim or final application.

5. The **clock** is the measurement of elapsed number of business days since the relevant Code obligation was triggered, less the elapsed number of business days during which the clock was stopped.

6. A distributor must:
    a. record the date on which the clock is started, stopped and restarted; and
    b. calculate elapsed clock business days; and
    c. make this information readily available to the applicant upon request.

7. Where the distributor notifies the applicant in writing that it is starting, stopping or restarting the clock after 5:00pm on a business day or at any time during a non-business day, the clock will be deemed to have started, stopped or restarted on the following business day.

8. A project cannot advance to the next stage of the connection process if the clock is stopped.

Clock stop/start mechanism – stopping/restarting the clock for distributor obligations

9. Clauses 10 to 13 below apply in relation to a distributor's obligation to decide an applicant's initial, interim or final application.

10. The distributor may stop the clock (by notifying the applicant in writing that it is doing so) if it reasonably considers that it cannot decide the application due to any factor(s) outside of its control, such as awaiting information from a third party or a force majeure event.

11. If it is later determined that it was not reasonable for the distributor to stop the clock:
    a. until a later date, then the clock will be deemed to have stopped at said later date; or
    b. at all, then the clock will be deemed not to have stopped.

12. The distributor must restart the clock (by notifying the applicant in writing that it is doing so) as soon as the distributor reasonably considers that the factor(s) referred to in clause 10 above are no longer:
    a. preventing the distributor from deciding the application; or
    b. outside of the distributor's control.

13. If it is later determined that the distributor should have reasonably restarted the clock at an earlier date, the clock will be deemed to have restarted at said earlier date.

Clock stop/start mechanism – stopping/restarting the clock for applicant obligations

14. Clauses 15 to 19 below apply in relation to the applicant's obligation to submit its interim or final application.

15. Following a request from the applicant, the distributor must stop the clock (by notifying the applicant in writing it is doing so) as soon as the distributor reasonably considers that the applicant cannot submit its application due to any factor(s) outside of its control, such as awaiting information from a third party or a force majeure event.

16. If it is later determined (via the relevant dispute resolution process) or agreed (between the applicant and the distributor) that the distributor should have reasonably stopped the clock at an earlier date, the clock will be deemed to have stopped at said earlier date.

17. The applicant must notify the distributor in writing as soon as the applicant is aware that the factors referred to in clause 15 above are no longer:
    a. preventing the applicant from submitting its application; or
    b. outside of the applicant's control.

18. The distributor must restart the clock (by notifying the applicant in writing it is doing so) as soon as it receives notification from the applicant pursuant to clause 17 above.

19. If it is later determined (via the relevant dispute resolution process) or agreed (between the applicant and the distributor) that the applicant should have notified the distributor at an earlier date, the clock still be deemed to have restarted at said earlier date.

Assigning priority position

20. A distributor must assign a priority position to a project when the applicant submits a completed initial application. Distributors may choose whether projects that have already submitted an initial application before the policy comes into effect should be assigned a priority position under the policy or continue to be treated under any previous arrangements.

21. A distributor must assign a project's priority position as follows:
    a. firstly, projects in more advanced stages of the connection process must be assigned higher priority positions than projects in earlier stages
    b. secondly, where there are multiple projects in the same stage of the connection process, projects must be assigned a priority position that reflects the order they arrive at that stage (unless the distributor determines that, during the construction (delivery) stage, a large project's priority position should be reduced due to the applicant missing a milestone).

22. When a project moves from one stage to another or otherwise has its priority position updated, the distributor must, where necessary, update all other relevant projects' priority positions.

Effect of priority position during initial and interim application stages

23. During the initial application and interim application stages, a distributor must take into account projects' priority positions when allocating distributor resources to applications (noting that distributors may still consider practical or efficiency factors when allocating distributor resources).

Effect of priority position during final application stage

24. During the final application stage, a distributor must:
    a. take into account projects' priority positions when allocating distributor resources to applications (noting that distributors may still consider practical or efficiency factors when allocating distributor resources)
    b. grant network access terms in accordance with projects' priority positions (provided it meets the distributor's operational and commercial standards and policies).

Effect of priority position during construction stage

25. During the construction (negotiation) stage and construction (delivery) stage, a distributor must take into account projects' priority positions when agreeing or amending any contractual terms affecting the allocation of distributor resources or allocating any discretionary distributor resources to project delivery (noting that distributors may still consider practical or efficiency factors when allocating distributor resources).

Setting milestones

26. For the purposes of clause 27 to 30 below, the default milestones and relevant criteria are set out in the table below:

Default milestones	Default criteria
Final design	The applicant must have finalised all necessary design plans for the project
Property rights	The applicant must have secured all necessary property rights to complete the project
Environmental approvals	The applicant must have secured all necessary environmental approvals to complete the project
Overseas Investment Office approval	The applicant must have secured all necessary Overseas Investment Office approvals to complete the project
Electricity Authority and System Operator approvals	The applicant must have secured all necessary Electricity Authority and System Operator approvals to complete the project
Supplier and construction contracts	The applicant must have secured all necessary supply and construction arrangements to complete the project
Finance	The applicant must have secured all necessary finance arrangements to complete the project
Final investment decision	The applicant must have reached a formal decision to proceed with the project
Construction	The applicant must have commenced work to construct the project
Commissioning	The applicant must completed commissioning activities and be able to operate at its maximum export power/load capacity

27. For each of the default milestones listed in clause 26 above, the applicant and the distributor must set out (either in a connection contract or a separate milestone agreement):
    a. whether the default milestone applies
    b. any additional details or amendments to the default criteria, including how the milestone will be deemed to have been satisfied
    c. any interim milestones that apply, including relevant criteria
    d. the timeframe in which the default milestone and any interim milestones must be satisfied.

28. The connection contract or milestone agreement must not include any milestones that are not listed in clause 26 above unless the distributor can demonstrate that the milestone (and associated criteria and timeframe) is necessary to ensure that the wider connection process is efficient and equitable.

29. An applicant and distributor must act reasonably when negotiating whether to include, and if so, the details of:
    a. default milestones
    b. any additional milestones.

30. When acting reasonably in accordance with clause 29, an applicant or distributor must, where necessary, consider:
    a. the nature of the project and how long it is expected to take
    b. the applicant's actions in previous stages of the connection process and its record for developing other projects
    c. the interactions with other terms of the connection contract, milestone agreement or any other agreement, including:
        i. other milestones that have been included or excluded
        ii. obligations on the distributor
    d. other projects in the network connections pipeline, including those that may compete with the project for:
        iii. distributor resource
        iv. preferential network access terms.

Applying milestones

31. Where the distributor's obligations may impact the applicant's milestones, the distributor must complete these milestones and provide the applicant with relevant information in a timely manner.

32. Where an applicant misses a milestone or is likely to miss a milestone, the applicant and the distributor may, by mutual agreement, renegotiate the milestone timeframe or milestone criteria.

33. As a condition of agreeing to amend the milestone timeframe or milestone criteria, the distributor may require that:
    a. the project's priority position be reduced, and any terms of the distributor's contractual obligations be amended in so far as they reflect this change in priority position

b. the network access terms on which final approval was granted be amended.

34. Where an applicant fails to renegotiate a missed milestone, the distributor may lapse the project's final approval by notifying the applicant in writing that it has done so.

35. An applicant can be considered to have failed to renegotiate a missed milestone if it:
    a. fails to engage in negotiation 5 business days after the distributor notifies the applicant in writing that it has missed the milestone deadline, or
    b. fails to agree to amend the milestone timeframe or milestone criteria 15 business days after the distributor notifies the applicant in writing that it has missed the milestone deadline.

36. A distributor must act reasonably when deciding:
    a. whether to agree to amend a milestone
    b. any conditions on a renegotiated milestone
    c. whether to lapse a project's final approval.

37. When acting reasonably in accordance with clause 36, a distributor may consider:
    a. whether the applicant has previously renegotiated this milestone, and if so, how many times, and
    b. whether the applicant has generally met their other milestones on time, and
    c. whether the applicant has demonstrated that it is close to meeting the milestone, and
    d. the degree to which meeting the milestone on time is important for the project to proceed in a timely manner, and
    e. the time the applicant has had to renegotiate the milestone, and
    f. the length of any extension to proposed milestone timeframes, and
    g. the extent of any change to proposed milestone criteria, and
    h. whether there is any other behaviour from the applicant that indicates gaming of the connection process or a lack of intent to progress the project, and
    i. the reason(s) the applicant did not or is unlikely to meet the milestone on time, and the degree to which this was within their control, and
    j. the extent to which amending the project's milestone timeframes, milestone criteria, priority position, network access terms, or final approval would affect other projects' allocation of distributor resource or network access terms.

38. Where a project's original network access terms resulted in less preferential terms being granted to other projects that gained final approval later in the process, and the distributor amends these network access terms or lapses the project's final approval in accordance with clauses 33 or 34 above (thereby allowing more preferential terms to be offered to these other projects), the distributor should offer these improved terms to other projects in order of their priority position.

39. Where a project's final approval is lapsed, the applicant may reapply by submitting a new initial application for the project.

Information publication requirements

40. Distributors must publish on their websites information as to:
    a. the number of large distributed generation projects
    b. the number of large load projects
    c. the sum of maximum export power for all large distributed generation projects
    d. the sum of load capacity for all large load projects.

41. The information published under clause 40 above must be presented:
    a. as an aggregated total
    b. broken down by:
        i. fuel type (for distributed generation) or load type (for load)
        ii. project stage.

42. Distributors must publish on their websites information as to each large distributed generation or large load project's:
    a. priority position
    b. maximum export power (for distributed generation) or capacity (for load)
    c. fuel type (for distributed generation) or load type (for load)
    d. project stage
    e. location (zone substation or feeder)
    f. date on which it entered its current stage
    g. clock status (as relates to the clock stop/start mechanism).

43. Distributors must update the information published about their network connections pipelines (as set out in clauses 40 and 42 above) before the final day of each calendar month (except for December which is to be updated on 22 December or the next business day if 22 December is not a business day).

44. Distributors must display the date on which the published network connections pipeline information was last updated.

Post-implementation review

45. Electricity Networks Aotearoa should review this connection queueing and management policy:
    a. within 12 and 24 months after the policy comes into effect, and
    b. subsequently, on a four yearly cycle

    and may amend the policy because of such review.

46. Electricity Networks Aotearoa may review this connection queueing and management policy outside of the review cycle outlined in clause 45, and may amend the policy because of such review provided that the amendments are:
    a. technical or non-controversial in nature, or
    b. in response to a material issue that has been identified, or
    c. due to a material change in circumstances.

47. Electricity Networks Aotearoa must consult with affected stakeholders as a part of any review of this connection queueing and management policy.

Dispute resolution

48. Any disputes in relation to this connection and queuing management policy and/or clock start/stop mechanism should be dealt with in accordance with (as appropriate):
    a. the dispute mechanism in Schedule 6.3 of the Code
    b. the standard method for reporting a breach of the Code to the Electricity Authority
    c. dispute resolution provisions in any signed connection contract between the relevant parties.

Non-discrimination

49. When queuing and managing projects in accordance with this policy, a distributor must not discriminate based on the ownership of, or beneficial interests in, the applicant, including whether the distributor has an ownership interest or a beneficial interest in that applicant.

Appendix 3: Compliance matrix

Provisions in the Code describe various obligations on distributors, which indirectly state various requirements for the Q&M policy. The Authority's accompanying decision paper states these policy requirements more overtly. These are set out in the table below, along with how the Q&M policy has given effect to these requirements.

Table 5: Compliance with policy requirements

REQUIREMENTS	IMPLEMENTATION IN POLICY	POLICY CLAUSE REFERENCES
A clear set of principles for managing applications	The policy sets out: • the requirements for a project to move from one stage to the next • how the 'clock' can be stopped and restarted where project applications may otherwise exceed Code timeframes due to factors outside a party's control • how priority positions must be set • how distributor resource should be allocated in accordance with priority position • how network access terms should be granted in accordance with priority position • how project milestones should be set and applied.	Clauses 3-39
How the queueing and management policy determines the priority position of applications in the network connections pipeline	The policy sets out how the priority position of a project is determined (both during application stages and post-approval).	Clauses 20-22
A core set of milestones that apply to most applications, with the ability to add additional milestones only where required	The policy identifies a list of default milestones that can be included in a connection contract or milestone agreement for a large project. Additional milestones cannot be added "unless the distributor can demonstrate that the milestone (and associated criteria and timeframe) is necessary to ensure that the wider connection process is efficient and equitable."	Clauses 26-30
Indicative timing to achieve each milestone, including the interim steps that need to be completed to reach that milestone	The policy does not identify specific timeframes that should be attached to specific milestones, as these are likely to vary substantially depending on the type of project, and should be determined contractually on a case-by-case basis.	N/A

REQUIREMENTS	IMPLEMENTATION IN POLICY	POLICY CLAUSE REFERENCES
Whose responsibility it is to achieve the milestone, and what each party must do	The policy focuses on milestones relating to applicants' obligations only (as these are the obligations that are directly relevant to the queuing and management of this project). Distributors will still have to meet certain obligations under the Code, regulated terms, and/or any connection contract, but these obligations will not directly affect the queuing and management of the relevant project – ie, the priority position will not change, the project will remain in the queue, etc.	N/A
How the clock stop/start mechanism operates with the queueing and management policy	The wider guidance in this paper provides an outline of the maximum timeframes specified in the Code within which a distributor/applicant must satisfy certain obligations. The policy contains a mechanism outlining when a distributor or applicant may/must stop or restart the clock for such timeframes, including what the distributor or applicant must consider when making such a decision.	Clauses 4-19
How tolerances will be applied for distributor and applicant tasks	The policy sets out what distributors must consider when: • negotiating whether to include, and if so, the details of, any default milestones or additional milestones • deciding whether to agree to amend a milestone • deciding any conditions to impose on a renegotiated milestone • deciding whether to lapse a project's final approval.	Clauses 29-30, 35-37
How applications will be managed when milestones are not achieved	See above.	Clauses 32-39
How milestones will be renegotiated, both for projects that meet and do not meet milestones, and where network conditions change so final approval is no longer valid	See above. Note that: • where projects do meet milestones, milestones should not need to be renegotiated • final approval should only be granted on terms that allow the network to accommodate the project, so changing network conditions should not affect the validity of final approval.	Clauses 32-39

REQUIREMENTS	IMPLEMENTATION IN POLICY	POLICY CLAUSE REFERENCES
How potentially competing applications will be managed, and how the distributor may encourage complementary applications	The policy sets out how the priority position of competing projects affects how distributor resource and preferential network access terms should be allocated between them. The policy notes that distributor resources should also be allocated based on other factors, including efficiency or practicality (for example, processing complementary applications together).	Clauses 20-25
The process that the distributor would use for removing approval of a final application	The policy sets out how distributors can enforce missed milestones, including by lapsing final approval. Note that if a project with final approval satisfies all milestones within the required timeframes, the distributor cannot lapse final approval.	Clauses 34-39
How disputes will be managed in accordance with Part 6	The policy sets out a mechanism for resolving disputes.	Clause 48

Appendix 4: Worked example

The following worked example sets out an indicative scenario that outlines how different aspects of the Q&M policy may affect the connection of two generation projects looking to connect at a similar part of the network. While the focus here is on large distributed generators, similar scenarios could apply to load projects or medium sized projects (with appropriate changes).

The Q&M policy only begins to apply when a completed initial application is submitted

1. A renewable generation developer, WIND LTD, is planning to build a 10 MW wind farm connected to the local distribution network.
2. Wind Ltd calls the distributor to enquire about what it needs to do. The distributor provides it with the necessary application forms (which the Code requires that distributors make publicly available and accessible) and talks it through the process it will need to follow and information it will need to provide. At this stage, Wind Ltd has not submitted a completed initial application. As such, it has not entered the first stage of the formal connection process and the Q&M policy does not yet apply.

Priority position is assigned based on stage, and the date at which an application arrives at a stage

3. Wind Ltd submits an initial application. The distributor reviews it, confirms the application is complete, notifies the applicant accordingly, and assigns the project a priority position (internally). The project enters the initial application stage and becomes a part of the network connections pipeline.
4. As the application is only at the first stage of the process and it is the most recent application to have arrived at that stage, it has the lowest priority position. However, the next day another renewable generation developer named SOLAR LTD submits a completed initial application for a 5 MW solar farm. It therefore joins the pipeline with a lower priority position than Wind Ltd's application.

Publishing application information provides transparency about competing applications

5. Once the projects enter the pipeline, the distributor publishes non-confidential information about the proposed projects, including their capacity, location and priority position. Wind Ltd is therefore made aware that there is a solar farm looking to connect nearby, and knows from other sources (for instance, the distributor's published capacity maps) that there is not enough current network capacity for both generation projects to connect and operate unconstrained.
6. Wind Ltd knows the solar farm currently has a lower priority position, and if this continues then Wind Ltd will be able to connect on terms that allow it to use this capacity ahead of the solar farm. However, Wind Ltd also knows that these preferential access terms are only secured when final approval is granted, and the solar farm could overtake Wind Ltd in the queue before the final approval stage. The distributor also publishes the date both projects entered the initial application stage, so Wind Ltd can see that the solar farm applied only one day later, indicating that the race is tight.

Priority position helps allocate distributor resources, but other factors also influence this

7. The distributor generally reviews applications with higher priority positions first. Because it is currently very busy with initial applications, after a few weeks it has still not assessed Wind Ltd's or Solar Ltd's initial applications. As the forty working days deadline approaches, the distributor reassigns some staff (who usually only work on assessing final applications) to help clear the backlog of initial applications. Even though final applications have a higher priority position than Wind Ltd and Solar Ltd's initial applications, priority position is not determinative of distributor resource allocation – the distributor is allowed to prioritise these later applications to help ensure all applications are decided within the specified maximum timeframes.
8. The extra help is enough to clear the backlog, and both Wind Ltd and Solar Ltd's applications are processed and approved within their respective deadlines. Because the distributor is more used to, and therefore quicker at, processing applications for solar farms than wind farms, Solar Ltd's application was actually granted before Wind Ltd's application. However, initial application approval does not constitute moving to the next 'stage' of the connection process – this occurs when an applicant submits an interim or final application. As such, Wind Ltd's project retains its higher priority position for now (even though Solar Ltd will have a bit more time to prepare its final application). The distributor notifies both parties of their approvals and informs them of their respective priority positions.

Specified maximum timeframes require applications to progress in timely manner

9. Because both generation projects are more than 300 kW in capacity, both applicants must submit interim applications within a specified maximum timeframe of 12 months. Both start preparing these applications, which involve developing more detailed plans and carrying out various system studies.
10. Some of these studies must be carried out by approved engineering consultants. While preparing the application, Wind Ltd is informed by one of its consultants that, due to unexpected staffing issues, completion of these studies will be delayed by several months. This would cause Wind Ltd's interim application to be delayed beyond the specified maximum timeframe, risking removal from the pipeline.

Clock stop/start mechanism puts application and timeframes on hold

11. To avoid being removed from the pipeline for exceeding a specified maximum timeframe, Wind Ltd requests that the distributor 'stop the clock' under the clock stop/start mechanism, as the delay is caused by an event that is outside of its control. The distributor considers this is a reasonable request, stops the clock by notifying the applicant it is doing so, and records the clock stop date.
12. While the clock is stopped, passing time does not count towards the 12-month specified maximum timeframe for submitting an interim application, but the project cannot move to the next stage. During this time, Solar Ltd submits its completed interim application and moves into the interim application stage and therefore ahead of Wind Ltd in queue priority.
13. A few months later, the engineering consultant resumes work on the system studies for the wind farm. Wind Ltd notifies the distributor and the distributor restarts the clock. 50

business days elapsed while the project was on hold, so the deadline for completing the interim application is now 50 business days later than what it otherwise would have been.

14. The engineering consultant completes the system studies, and Wind Ltd completes the rest of the interim application for the project and submits it to the distributor before this revised deadline. The project therefore moves to the interim application stage (but remains behind Solar Ltd's project).

Network access terms only secured at the final application stage

15. However, Wind Ltd works quickly and submits its final application shortly after receiving interim approval (and, crucially, just before Solar Ltd submits its final application). By doing so, Wind Ltd ensures it will receive preferential network access terms ahead of Solar Ltd's solar farm (although, as noted later, this could change if Wind Ltd fails to meet its ongoing obligations on time).
16. The distributor reviews Wind Ltd's final application. It approves it, allowing it to connect under terms that would allow it to export its full capacity ahead of potential future generators (since the distributor's congestion management policy constrains competing renewable generation on a 'first-on, last-off basis'). The distributor then notifies Wind Ltd (and other relevant parties, including Solar Ltd) that final approval has been granted on these terms.
17. Solar Ltd realises that, now the Wind Ltd has obtained final approval, the network will not have enough capacity for it to connect its solar farm as originally designed. It has discussions with the distributor about how it could still connect the full-sized solar farm, and offers to install a battery energy storage system (BESS) that can store solar energy when the solar farm is generating at a high level, in order to reduce its maximum power export.
18. Having made these amendments, Solar Ltd submits its final application. The distributor approves the application on the condition that the solar farm never injects more than 3 MW into the network at any given time, which is now possible due to the addition of the battery. Solar Ltd's application then enters the post-approval stage (but with a lower priority position than Wind Ltd's project, which affects connection delivery timeframes as discussed further below).

Milestones can be set out in connection contracts or in milestone agreements

19. Wind Ltd notifies the distributor (within the designated timeframe) that it intends to negotiate a connection contract. They negotiate a connection contract that includes most of the default milestones set out in the Q&M policy, including that Wind Ltd must obtain resource consent within one year of the contract being signed. Because this is quite a long timeframe, the parties also agree on an interim milestone where Wind Ltd must have applied for resource consent within two months.
20. The contract also includes finance and final investment decision milestones that cannot be completed until after resource consent is granted. As such, the parties agree that finance will be due 15 months after the contract is signed and final investment decision will be due 18 months after the contract is signed.
21. Some default milestones are not included. For instance, Wind Ltd is a fully New Zealand-owned company, so there is no need for it to obtain Overseas Investment Office approval.

22. On the other hand, Solar Ltd would prefer to simply connect on the regulated terms set out in the Code. It notifies the distributor that it does not intend to negotiate a connection contract, and they begin the process of agreeing the details of the default milestones in a milestone agreement. Solar Ltd has been facing financial issues, but is currently in the process of being acquired by a large overseas company. Since this project is dependent on that acquisition, the parties agree to add an additional milestone (ie, different from the default milestones) to the milestone agreement that the acquisition must have been completed within 6 months.

Priority position informs contractual timeframes

23. When negotiating the connection contract with Wind Ltd, the distributor initially planned to begin construction of a new substation necessary to connect the wind farm 19 months after the contract is signed (ie, one month after the wind farm is expected to reach final investment decision).
24. However, many of the distributor's construction resources are scheduled to be connecting a new industrial load customer around this time. The distributor uses a separate queue for load projects, so that project's priority position (ie, as a number) is not directly comparable to Wind Ltd's priority position. However, the parties can all see that the industrial project arrived at the construction stage before Wind Ltd's project, so it would have a higher priority position if the parties were in the same queue. As such, the distributor prioritises work to connect the industrial project. However, this work is expected to be finished in about two years' time, so resources will then be available to start connecting Wind Ltd's project.
25. Therefore, when negotiating the connection contract with Wind Ltd, the distributor ensures that it is only required to start constructing the substation one month after it reaches final investment, or in two years' time, whichever comes later.

Milestones can be amended/extended with conditions

26. Wind Ltd lodges its resource consent application promptly, meeting its interim milestone. However, due to disagreement about the wind farm's visual impact on an outstanding natural landscape, the matter is referred to the Environment Court, delaying the process and preventing Wind Ltd from meeting its consenting milestone within the one year timeframe in its connection contract. It requests a three-month extension for this milestone.
27. Following the process and principles laid out in the policy (since these are included in the connection contract), the distributor considers that the applicant is doing everything in its power to obtain resource consent, is on track to meet all other contractual milestones, and that the requested extension is reasonable. It therefore grants the extension for the consenting milestone (and similar extensions for the finance and final investment decision milestones) and allows Wind Ltd to retain its priority position.
28. However, after three months, the resource consent has still not been granted. This time, the distributor considers that the delay could begin to affect projects in the connection pipeline or cause some construction resources to inefficiently go into hibernation. Therefore, although it grants the extension and allows Wind Ltd to retain final approval (and its associated network access terms), it also reduces Wind Ltd's priority position and amends

the timeframes in Wind Ltd's works agreement accordingly, so that distributor resources are now prioritised to other projects.

29. The Environment Court finally makes a decision on Wind Ltd's resource consent, but it declines the application. Wind Ltd plans to appeal the decision and requests a further two-year extension. The distributor considers agreeing to the extension on the condition that the wind farm's access terms are amended so that Solar Ltd could export at full capacity from its solar farm, but considers that there could be other projects that may also want to use this network capacity, and it is therefore more appropriate to deny the extension altogether and remove Wind Ltd's project from the pipeline. This means Wind Ltd loses final approval and its network access terms and must make a new application if it still wants to connect.

Improved access terms offered in order of priority position

30. Since Wind Ltd's network access terms no longer apply, other projects could potentially now connect on preferential terms. The distributor therefore offers improved terms to other applicants with final approval who were previously prevented from using it. It first offers Solar Ltd (the project with the next highest priority position) to connect its solar farm without a battery at its full export capacity as per its original application. However, Solar Ltd has already ordered the battery, and is happy to connect with a smaller connection due to the lower lines charges, so it declines the new terms.
31. The distributor therefore offers this capacity to any other projects with final approval that had to downsize or amend their final application due to Wind Ltd connecting ahead of them. It does so in accordance with the priority positions of these projects.

Resubmitted applications will generally be processed more quickly

32. After some time, Wind Ltd successfully appeals the Environment Court's decision and obtains a resource consent for the wind farm. It begins a new application process to connect to the network.
33. Fortunately for Wind Ltd, during this time there have been no other generation projects applying to connect to that part of the network (other than a slight increase in small-scale rooftop solar), so the export capacity in that part of the network remains very similar. Network impact study requirements are therefore minimal, and Wind Ltd can mostly just resubmit its previous application and previous network studies.
34. Following discussions with the distributor, Wind Ltd submits its initial and interim application contemporaneously. The distributor can process these quickly as little has changed, so both applications are approved in a short period of time. Wind Ltd then submits a final application, which is also approved.
35. The distributor and Wind Ltd negotiate a connection contract similar to the one that existed previously. Crucially though, this time there is no need to include a milestone for resource consent, as this has already been granted. Wind Ltd satisfies the other milestones, including finance and final investment decision. The distributor constructs the connection assets and Wind Ltd completes its wind farm and connects it to the network.