

16 June 2026

Electricity Authority
PO Box 10041
Wellington 6143

By email to: distribution.feedback@ea.govt.nz

Dear Electricity Authority team,

Consultation Paper— *Improving information on high-voltage network capacity*

Electricity Networks Aotearoa (ENA) welcomes the opportunity to make a submission to the Electricity Authority (Authority) on its consultation paper on *Improving information on high-voltage network capacity* (the paper).

ENA is the membership organisation representing all 28 electricity distribution businesses (EDBs) that distribute electricity across Aotearoa (EDBs represented are listed in Appendix A).

EDBs employ over 7,800 people, deliver energy to more than two million homes and businesses, and have spent or invested \$6.8 billion in network assets over the last five years. ENA harnesses members' collective expertise to promote safe, reliable, and affordable power for our members' customers.

1 Introduction

ENA agrees with and supports the fundamental premise of the Authority's paper – that EDBs should make high-voltage network capacity information available to network access seekers, and the public more generally. We note that many EDBs have already made network capacity and other information available, and an increasing number have projects actively underway to do so. Based on a recent survey of members, ENA estimates that approximately 34% of ICPs are already covered by a live capacity map, while a further 51% are located within networks where capacity map projects are currently underway. Given the significant progress already being made by the sector to deliver capacity map tools, we do not see a strong case for Authority intervention at this time. Indeed, in the first six months of this year, we've seen capacity maps launched (presented in no particular order) by:

- Counties Energy
- Northpower
- WEL Networks
- PowerNet

ENA's position can be summarised as follows:

- ENA supports the objective of improving access to high-voltage network capacity information.
- The distribution sector is already making substantial progress towards this objective through voluntary investment and deployment of network capacity map tools.
- The Authority has not demonstrated a sufficiently compelling case for regulatory intervention at this time, particularly given the progress already being made by EDBs.

- The cost-benefit analysis presented in the paper does not provide a robust basis for imposing new regulatory obligations on all EDBs and, ultimately, increased costs on electricity consumers.
- The proposed requirements relating to alternatives to network reinforcement represent a significant expansion in the scope of the proposals and should be considered through a separate work programme.

2 The case for regulatory intervention has not been made

As noted above, ENA sees good progress being made by the sector as a whole to develop and deploy capacity map tools. We feel that this progress alone provides strong grounds for the Authority to reconsider whether regulatory intervention is necessary at this time. In addition, we think that the rationale presented in the Authority paper provides insufficient grounds to proceed further with an intervention.

2.1 Problem definition and proposed response

In the paper, the Authority states

4.5 To manage the increased complexity of power flows and demand, distributors will need accurate information about the topology, current capacity and some modelling of future capacity of their networks.

ENA agrees with this statement. Distribution networks are becoming increasingly complex, and EDBs will need access to better information and modelling capability to continue operating and planning their networks efficiently.

However, the paper then shifts focus to a different issue:

4.6 Access seekers also need information about network topology and forecast capacity or constraints to make informed decisions about how to meet their energy needs. For example, access seekers would be able to make efficient decisions about whether to invest in DER or to connect to a distribution network in a different location that offers more appropriate capacity or connection conditions.

ENA agrees that access seekers can benefit from having appropriate information about network capacity and constraints. However, this is a distinct issue from the operational and planning information EDBs require to manage their own networks.

The paper does not clearly establish the connection between the problem it identifies and the intervention it proposes. The problem statement is primarily concerned with EDBs having access to better information about their networks, whereas the proposed intervention is almost entirely concerned with publication and disclosure obligations. While there may be benefits associated with greater disclosure, the paper does not clearly explain why additional regulatory disclosure requirements are the most appropriate response to the problem identified.

More fundamentally, the paper does not demonstrate that current levels of disclosure are materially impeding efficient access seeker decision-making, nor that the proposed disclosures would be the most effective means of addressing any such problem. In ENA's view, the problem definition and the proposed intervention are insufficiently connected, making it difficult to assess whether the proposed regulatory response is proportionate or necessary.

2.2 The cost-benefit analysis is inadequate

The cost-benefit analysis presented in the paper does not provide a strong basis for proceeding with the proposed intervention. The Authority repeatedly acknowledges that there is limited information available to quantify either the costs or the benefits of the proposal and therefore relies primarily on qualitative assertions. However, despite this acknowledged uncertainty, the Authority concludes that the benefits of the proposal are likely to outweigh the costs. ENA does not consider that conclusion is adequately supported by the analysis presented.

In the paper the Authority asserts:

5.60 Given that the focus of our proposal is on the use of high-voltage network information that is, in most cases, already available to distributors, we think the overall costs of this proposal will not be highly material.

This is a broad characterisation to make in relation to a proposal that will impose obligations on a diverse range of businesses with differing levels of system capability, data maturity and integration. The existence of underlying network data does not mean that the systems, processes, governance arrangements, modelling capability and publication tools required to comply with the proposed obligations already exist. The Authority acknowledges elsewhere in the paper that it has not received information on the likely costs of system upgrades and implementation. In ENA's view, this creates a significant gap in the evidence supporting the analysis.

The Authority's assessment also appears to understate the opportunity costs associated with implementation. Compliance with the proposed obligations will require EDBs to devote engineering, planning, GIS, data and regulatory resources to the development of network visibility tools, supporting processes and ongoing disclosures. These specialised capabilities are often in limited supply across the sector. At a time when EDBs are managing increasing connection activity, responding to electrification, implementing recent regulatory changes and adapting to the demands of the energy transition, resources directed towards compliance with these proposals will necessarily be unavailable for other initiatives. The Authority should therefore consider not only the direct financial costs of implementation, but also the value of the activities that may be delayed, deferred or forgone as a consequence of the proposed requirements.

Likewise, the paper identifies a range of potential benefits, but these are generally expressed as expected outcomes rather than demonstrated impacts. No attempt is made to estimate the magnitude, likelihood or timing of the claimed benefits. The analysis assumes that access seekers will make meaningful use of the information, that improved disclosures will influence investment and connection decisions, and that greater network visibility will support more efficient use of network capacity. While these outcomes are plausible, the paper does not provide evidence that they will occur to a degree sufficient to justify the proposed costs.

Several EDBs have already deployed network capacity map tools, with others actively developing them. These implementations provide an obvious opportunity to assess actual user uptake, user behaviour, connection outcomes and realised benefits. The paper contains little evidence that such analysis has been undertaken. Before imposing mandatory obligations across the sector, ENA considers it would be prudent for the Authority to evaluate the actual benefits being delivered by existing implementations and use that evidence to inform any future regulatory intervention.

2.3 Any intervention should be proportionate and targeted

Should the Authority ultimately decide that regulatory intervention is warranted, ENA considers the requirements presented in the paper should be modified so that they apply to EDBs in a proportionate manner. The distribution sector comprises EDBs with materially different network characteristics, connection activity and levels of demand from access seekers, and the Authority has not demonstrated that the benefits of mandatory network visibility requirements, as proposed in the paper, will be realised uniformly across all networks.

If the Authority does decide to proceed, it should consider targeted implementation mechanisms, exemptions, or alternative compliance pathways for EDBs where current demand for network visibility information is limited. This would help ensure that compliance costs borne by consumers remain proportionate to the benefits likely to be delivered. ENA considers that the final framework must include a mechanism through which EDBs can seek exemption from some or all of the proposed requirements where they can demonstrate that the expected benefits are unlikely to justify the associated compliance costs and resource commitments.

2.4 The timing of technical specifications creates implementation risks

ENA is concerned about the proposed sequencing of the Code amendments and the development of the associated technical specifications.

Under the proposal, EDBs would be subject to mandatory implementation deadlines, while many of the detailed requirements that will determine how those obligations must be met would only be developed subsequently through the technical specifications. The consultation paper indicates that these specifications are expected to cover matters such as data formats, terminology, mapping requirements, GIS integration, privacy protections and other implementation details.

The practical effort required to comply with the proposed obligations will depend heavily on the content of these specifications. Until they are available, EDBs cannot fully assess the systems, processes, resources and investments that may be required to achieve compliance. This creates uncertainty regarding both implementation costs and delivery timeframes.

This risk is particularly acute for EDBs that already have capacity map projects underway. If the technical specifications introduce new or different requirements after those projects have already been designed, procured or partially implemented, EDBs may need to revisit system architecture, data models, vendor arrangements, publication formats or internal processes. This could create significant additional cost, delay and re-work.

In those circumstances, the proposed regulatory intervention may have the opposite effect to that intended. Rather than accelerating the availability of network capacity information, the prospect of future technical specifications could cause EDBs to pause, slow or re-scope existing capacity map projects until the regulatory requirements are known. This would risk delaying the delivery of capacity map tools that are already in development.

This compresses the effective implementation period available to EDBs and creates a risk that compliance timeframes are determined by the timing of the Authority's specification-development process rather than by the complexity of the work required to implement the obligations.

This risk is heightened by the diversity of systems, data maturity and capability across the sector. While some EDBs may already possess many of the capabilities required to comply, others may require substantial system development, integration work or process changes once the detailed requirements are known.

If the Authority decides to proceed with the proposal, ENA considers that implementation timeframes should not commence until the technical specifications have been finalised and sufficient time has been allowed for EDBs to understand, plan and implement the resulting requirements.

3 Regulatory overlap should not be underestimated

In the paper, the Authority has gone to some lengths to assess the extent of any gap or overlap that exists between existing regulatory requirements – especially those overseen by the Commerce Commission – and the new requirements proposed as part of this consultation. It is encouraging to see a regulator undertake this analysis and we commend the Authority for doing so.

However, ENA considers that the Authority has underestimated the practical burden that can arise when EDBs are required to comply with multiple disclosure regimes that seek similar information for different purposes. The issue is not simply whether information is already collected or disclosed elsewhere. In many cases, the burden arises because information must be prepared, calculated, presented or updated in different ways to satisfy different regulatory requirements.

As a result, even where two disclosure requirements appear superficially similar, they may still require separate processes, systems, governance arrangements and quality assurance activities to support compliance. This can create unnecessary complexity and cost, while also increasing the risk of inconsistent information being presented to stakeholders.

A clear example is the proposed requirement to publish SAIDI and SAIFI information for high-voltage networks on a quarterly basis. The underlying definitions, calculation methodologies and reporting periods used in the Commerce Commission's Information Disclosure regime are not readily compatible with the quarterly reporting proposed by the Authority. Consequently, EDBs may be required to publish multiple versions of what appears to be the same information, calculated using different assumptions or time periods.

This is highly undesirable. It risks creating confusion amongst users of the information, undermining confidence in the accuracy of published data and reducing the benefits that the disclosure is intended to provide. Where information is already subject to established regulatory definitions and assurance processes, any new disclosure requirements should, as far as possible, align with those existing frameworks.

4 Alternatives to network reinforcement should be treated separately

The use of non-network solutions (NNS) as an alternative to traditional network reinforcement or expansion is an area of active development across the distribution sector. ENA is aware of many EDBs investigating, trialling or procuring flexibility services to defer or avoid network investment. Examples include targeted flexibility procurements, standing offers for network support services, and participation in emerging market platforms such as Our Energy's LocalFlex¹ initiative. We expect further innovation and development in this area over the coming years.

Unlike the other elements of the proposal, which are primarily concerned with the publication of network information already held by EDBs, the proposed NNS disclosure requirements would require EDBs to form and publish forward-looking views regarding future operational decisions, procurement intentions and the expected use of alternative solutions. This represents a significant expansion in the scope of the proposal. Publishing network topology, hosting capacity and reliability information is

¹ <https://www.localflex.co.nz>

fundamentally different from publishing information about where an EDB expects to procure flexibility services, the extent to which those services may be used, and the price an EDB may be willing to pay for them. These matters are inherently more uncertain than network capacity information and raise a distinct set of policy, commercial and regulatory questions that are largely separate from the network visibility objectives underpinning the remainder of the consultation.

The proposed NNS disclosures also risk becoming quickly outdated as network conditions, investment plans, customer behaviour and flexibility markets evolve. There is a material difference between disclosing current or forecast network capacity and disclosing future expectations regarding procurement activity. The latter is inherently more uncertain and may create expectations amongst market participants that do not ultimately align with EDBs' future operational requirements.

ENA also does not agree that the development or procurement of NNS is dependent upon the implementation of the network visibility proposals outlined in this paper. As noted above, many EDBs are already actively investigating, trialling and procuring flexibility services through targeted procurement processes, bilateral arrangements and emerging market platforms. Clearly, the distribution sector's ability to identify and utilise NNS is not contingent on the publication of the network visibility information proposed by the Authority.

There is also a risk that requiring non-network solution opportunities be included in network visibility obligations could create duplication and confusion for both EDBs and potential flexibility service providers. Where EDBs are already using dedicated procurement processes, such as specific tenders, flexibility platforms or market mechanisms to identify and procure NNS, requiring similar information to be separately published through network visibility tools would create multiple channels for communicating the same opportunities. This would increase compliance costs and administrative burden while providing limited additional benefit to access seekers or flexibility providers.

In addition, this is an area where there is likely to be overlap with broader regulatory discussions regarding flexibility services, network investment incentives and future distribution sector settings. ENA considers there would be value in considering these matters in a more holistic manner rather than addressing them through a relatively narrow network visibility workstream.

For these reasons, ENA considers that the proposed requirements relating to alternatives to network reinforcement should be removed from the current proposal and considered through a dedicated work programme. This would allow the Authority to undertake a more comprehensive assessment of the policy issues involved and ensure that any future obligations are developed in a manner that reflects the rapidly evolving nature of flexibility markets and NNS.

5 Conclusion

ENA supports the objective of improving access to high-voltage network capacity information and agrees that greater network visibility has the potential to benefit access seekers, consumers and EDBs. However, we do not consider that the Authority has demonstrated a sufficiently compelling case for the proposed regulatory intervention at this time.

As outlined in this submission, the distribution sector is already making substantial progress towards the development and deployment of network capacity map tools. In ENA's view, the paper does not adequately demonstrate that existing levels of disclosure are creating material inefficiencies, nor does it provide a sufficiently robust assessment of the costs and benefits of the proposed intervention. We are also concerned about the implementation risks created by the proposed sequencing of Code obligations and technical specifications, the practical burden associated with overlapping disclosure requirements, and the inclusion of proposals relating to alternatives to network reinforcement that extend well beyond the core network visibility objectives of the consultation.

ENA encourages the Authority to continue working collaboratively with EDBs to support the ongoing development of network visibility tools and capabilities. In particular, we consider there would be value in further assessing the benefits being delivered by existing capacity map implementations, allowing current industry-led initiatives to continue maturing, and considering any future proposals relating to alternatives to network reinforcement through a dedicated work programme.

If you have any questions about ENA's submission please contact Richard Le Gros, Policy and Innovation Manager (richard@electricity.org.nz).

Yours sincerely



Richard Le Gros

Policy and Innovation Manager

Appendix A: ENA Members

Electricity Networks Aotearoa makes this submission along with the support of its members. Listed below are the lines companies represented by ENA:

- Alpine Energy
- Aurora Energy
- Buller Electricity
- Centralines
- Counties Energy
- EA Networks
- Electra
- Electricity Invercargill
- Firstlight Network
- Horizon Networks
- MainPower
- Marlborough Lines
- Network Tasman Limited
- Network Waitaki
- Northpower
- Orion New Zealand
- OtagoNet – represented by PowerNet
- Powerco
- Scanpower
- The Power Company – represented by PowerNet
- Top Energy
- The Lines Company
- Unison Networks
- Vector
- Waipa Networks
- WEL Networks
- Wellington Electricity
- Westpower

Appendix B: Response to Authority questions

Questions	Comments
Q1. Do you agree with our assessment of the current state of the information and capabilities needed to inform network hosting capacity? If not, please explain why.	<p>ENA broadly agrees that most EDBs have a good understanding of the topology and power flows on their high-voltage networks. However, capability and maturity vary across the sector. While some EDBs already have sophisticated hosting-capacity and network visibility tools in place, others are at an earlier stage of development. The Authority should be cautious about assuming a uniform starting point across all EDBs when assessing implementation costs and timeframes.</p>
Q2. Do you agree the issues identified by the Authority are worthy of attention? If not, please explain why.	<p>ENA agrees that improving access to information about network capacity, constraints and hosting capacity is worthy of attention. However, we do not consider that the paper clearly distinguishes between issues relating to EDBs' internal visibility of their networks and issues relating to disclosure of network information to access seekers. While both are important, they are distinct issues and may not require the same regulatory response.</p>
Q3. Do you agree with our assessment that now is the time to regulate for network visibility? If not, when do you consider would be the right time?	<p>No.</p> <p>ENA supports the objective of improving network visibility but does not consider the Authority has demonstrated that regulatory intervention is necessary at this time. Significant voluntary progress is already occurring across the sector. Based on a recent survey of members, ENA estimates that approximately 34% of ICPs are already covered by a live capacity map tool, while a further 51% are located within networks where capacity map projects are underway.</p> <p>Given this level of activity, ENA considers the Authority should first assess the effectiveness and benefits of existing implementations before introducing mandatory obligations across the sector.</p> <p>If, notwithstanding the above, the Authority decides to proceed with mandatory requirements, ENA considers that a one-size-fits-all approach would be inappropriate. The Authority should ensure exemptions are</p>

Questions	Comments
	<p>available where access-seeker demand is currently limited. This would help ensure that compliance costs borne by consumers remain proportionate to the benefits likely to be realised.</p>
<p>Q4. Do you agree with our assessment of the outcomes that network visibility supports? If not, why not?</p>	<p>ENA agrees that improved network visibility has the potential to support more informed connection and investment decisions for some access seekers.</p> <p>However, the Authority appears to assume a relatively large population of access seekers will be able to use this information to optimise site selection and connection decisions. ENA is uncertain that this assumption holds in many cases. For a large proportion of access seekers, the location of the project is fixed before network connection options are considered. The benefits of network visibility may therefore be concentrated amongst a relatively small subset of access seekers with genuine location flexibility.</p> <p>ENA also does not consider that the proposed network visibility requirements are necessary to enable the development or procurement of NNS. EDBs are already exploring, procuring and deploying NNS through mechanisms such as targeted procurement processes, standing offers, bilateral arrangements and emerging flexibility platforms. To the extent that the Authority considers network visibility may support the development of NNS, that does not mean requirements relating to NNS should be included within this proposal rather than considered separately.</p>
<p>Q5. Do you consider the proposed amendments to Part 6 of the Code would promote the Authority's statutory objective? If not, why not?</p>	<p>Potentially, but ENA is not convinced that the Authority has demonstrated that the proposed amendments are the most efficient means of doing so.</p> <p>The Authority's rationale places considerable emphasis on EDBs requiring better information to manage increasingly complex networks. ENA agrees with that proposition. However, the paper does not clearly explain why mandatory publication of that information to third parties is the most appropriate or efficient response to that issue.</p>

Questions	Comments
<p>Q6. Are there any matters you believe are missing from the proposed Code amendment? Please specify.</p>	<p>No. ENA does not consider that any significant matters are missing from the proposed amendment. Rather, our concern is that certain elements—particularly those relating to alternatives to network reinforcement—extend beyond the core scope of network visibility and should be considered separately.</p>
<p>Q7. Is the indicative timeframe for implementing the proposed Code amendment likely to be adequate? If not, please provide information supporting a different timeframe, including identifying cost savings from a later implementation date.</p>	<p>ENA is concerned that the proposed implementation timeframe does not adequately account for the timing of the technical specifications.</p> <p>For EDBs with mature hosting-capacity capabilities or projects already well advanced, the proposed timeframe may be achievable. However, for EDBs starting from a lower level of capability, and particularly where existing projects may need to be adapted to accommodate future technical specifications, the implementation timeframe may prove challenging.</p> <p>At a minimum, ENA considers implementation periods should commence only after the technical specifications have been finalised.</p>
<p>Q8. What are your views on the proposed approach where detailed information about the data sets captured within the definition of network capacity information would be contained in technical specifications?</p>	<p>ENA generally supports this approach. Technical specifications provide a more flexible mechanism for defining detailed requirements than embedding those requirements directly in the Code.</p> <p>However, because the practical compliance burden will depend heavily on the content of the specifications, the Authority should ensure sufficient implementation time is available once those specifications are finalised.</p>
<p>Q9. Do you consider that the proposal to develop network visibility specifications in consultation with interested parties would be effective? If not, why not?</p>	<p>Yes.</p> <p>Meaningful involvement of EDBs will be critical to ensuring the specifications are practical, achievable and aligned with the data and systems that already exist across the sector. Early and ongoing engagement with EDBs should help minimise unnecessary compliance costs and implementation risks.</p>
<p>Q.10. Is the proposed timeframe for developing the specifications likely to be sufficient?</p>	<p>On the face of it, six months appears reasonable.</p> <p>However, the appropriateness of that timeframe will depend on the scope of the</p>

Questions	Comments
	<p>specifications and the extent of stakeholder engagement undertaken. ENA considers the proposed requirements relating to alternatives to network reinforcement should be removed from this workstream, as their inclusion would significantly increase the complexity of the specifications.</p>
<p>Q11. Do you agree with the proposal to start with high-voltage network visibility? If not, please share your perspectives on where best to start.</p>	<p>Yes.</p> <p>ENA agrees that high-voltage networks are the most appropriate place to start. EDBs generally have better visibility of topology and power flows on their high-voltage networks, making this a more practical and proportionate starting point than low-voltage networks.</p>
<p>Q12. Do you agree with the assumptions the Authority has made? Why/Why not?</p>	<p>Not entirely.</p> <p>ENA is uncertain about the extent to which access seekers will be able to use the proposed information to optimise site selection or choose between multiple connection locations. While some classes of access seeker may derive value from network visibility information, ENA expects this group to represent a relatively small proportion of overall connection activity. ENA also considers the paper may understate the costs and resource commitments required to convert existing network data into the disclosure formats contemplated by the proposal.</p>
<p>Q13. Have we correctly identified the benefits of network visibility?</p>	<p>ENA agrees that the Authority has identified a number of plausible benefits.</p> <p>However, we are less certain about the scale of those benefits and the extent to which they will be realised in practice. In particular, the paper provides limited evidence regarding the number of access seekers likely to derive material value from the proposed disclosures.</p>
<p>Q14. Do you have any information that might help quantify the value of these benefits? If so, please provide this information.</p>	<p>ENA does not currently have information that would allow robust quantification of the proposed benefits.</p> <p>However, ENA notes that several EDBs have already implemented network visibility tools. These implementations provide an opportunity to assess actual user uptake and realised benefits, and ENA encourages the Authority to</p>

Questions	Comments
	consider this evidence before proceeding with mandatory requirements.
Q15. Have we correctly identified the costs of network visibility?	<p>ENA agrees that the paper identifies many of the <i>categories</i> of costs likely to be incurred by EDBs. However, we do not consider that the analysis adequately captures the uncertainty associated with implementation costs, particularly given the diversity of systems and capabilities across the sector and the fact that the technical specifications have not yet been developed.</p> <p>ENA also considers that the paper does not adequately account for the opportunity costs associated with implementation. Compliance with the proposed requirements will require EDBs to devote engineering, planning, GIS, data and regulatory resources to the development of new tools, processes and disclosures. These specialised capabilities are often in limited supply across the sector. At a time when EDBs are managing increasing connection activity, responding to electrification and implementing a range of regulatory and industry initiatives associated with the energy transition, resources directed towards these proposals will necessarily be unavailable for other activities that may deliver greater benefits to consumers. The Authority should therefore consider not only the direct financial costs of implementation, but also the value of the activities that may be delayed, deferred or forgone as a consequence.</p>
Q16. Do you have any information that might help quantify the costs? If so, please provide this information.	Individual EDBs will be best placed to provide detailed information on likely costs based on their specific circumstances and current levels of capability.
Q17. Have we correctly identified the regulatory overlaps?	<p>Broadly, yes.</p> <p>However, ENA considers that the paper understates the practical burden that can arise when EDBs are required to comply with multiple disclosure regimes that seek similar information but apply different definitions, methodologies, reporting periods or assurance requirements.</p>
Q18. Do you agree with our assessment that there is a net benefit notwithstanding any regulatory overlap? If not, why not?	No.

Questions	Comments
	<p>Given the uncertainty surrounding both the costs and the benefits of the proposal, ENA does not consider the Authority has demonstrated that there is a net benefit. In particular, the paper contains limited evidence regarding the realised benefits of existing network visibility tools and does not quantify many of the costs likely to be incurred.</p>
<p>Q19. Do you have any information that might help quantify the costs and benefits associated with the regularly overlap? If so, please provide this information.</p>	<p>Individual EDBs will be better placed to provide evidence regarding the practical costs of complying with overlapping regulatory requirements.</p>
<p>Q20. Do you agree that the Authority should consider reducing the regulatory overlap as the proposed specifications are developed?</p>	<p>Yes. ENA supports any efforts by regulators to minimise duplication, inconsistency and unnecessary compliance burden wherever possible.</p>
<p>Q21. Do you agree with our assessment that there will be net benefit from the proposed amendments? If not, why not?</p>	<p>No. While the proposed amendments may generate benefits, ENA does not consider that the Authority has provided sufficient evidence to demonstrate that those benefits are likely to outweigh the costs. Further assessment of both realised benefits and implementation costs would be valuable before proceeding with mandatory obligations.</p>
<p>Q22. Do you agree the proposed amendment is preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010.</p>	<p>ENA is not currently persuaded that the proposed amendment is preferable to allowing existing industry-led initiatives to continue maturing. Given the substantial voluntary progress already occurring across the sector, ENA considers that a less interventionist approach should be more fully evaluated before mandatory requirements are introduced.</p>
<p>Q23. Do you agree the Authority's proposed amendments comply with section 32 of the Electricity Industry Act?</p>	<p>ENA is not convinced that the Authority has yet demonstrated that the proposed amendments represent the most appropriate means of achieving the intended outcomes. In particular, ENA considers that the evidential basis supporting the proposal could be strengthened through further assessment of costs, benefits and existing industry initiatives.</p>

Questions	Comments
<p>Q24. Do you have any comments on the drafting of the proposed amendment?</p>	<p>ENA is concerned that the proposed requirements relating to alternatives to network reinforcement fall outside the core scope of network visibility and significantly broaden the nature of the proposal.</p> <p>Unlike the other elements of the amendment, which relate primarily to disclosure of network information, these provisions require EDBs to form and publish forward-looking views regarding future operational decisions, procurement intentions and the expected use of NNS. ENA considers these matters should be addressed through a dedicated work programme rather than through the proposed network visibility amendments.</p>
<p>Please indicate if you wish to be consulted during the development of the technical specifications supporting the proposed Code amendment.</p>	<p>Yes, ENA would like to be both directly involved in and consulted during the development of the technical specifications.</p>