2 July 2026

Electricity Authority
PO Box 10041
Wellington 6143

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

Dear Electricity Authority team,

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

Electricity Networks Aotearoa (ENA) welcomes the opportunity to make a cross-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 Reflections on submissions to the Authority

The Authority has helpfully summarised the submissions received, and the type of stakeholder they represent, in the table below, which was circulated via email. While we appreciate that consultation is not a 'numbers game', we do think it noteworthy that only two (perhaps three if ERGANZ is included) organisations representing access-seekers have chosen to submit on the proposals. Given that the Authority asserts that these proposals will generate significant benefits for this group, it seems unusual that they wouldn't take the opportunity to express their support in greater numbers. Conversely, there is strong representation from EDBs and other network owners or operators who would be directly affected by the proposals, and in ENA's view some consistent themes emerge. We agree with the Authority's characterisation of some submissions as potential 'service providers' and 'academic'. While these have some interesting perspectives to contribute, we do not feel that they directly address the question of whether the Authority's proposed intervention is warranted in the context of the New Zealand electricity supply industry.

Network Owners	Access Seekers	Industry Bodies	Service Providers	Academic
Buller Electricity	Meridian Energy	ENA	EA Technology	Deakin University
Counties Energy	Supa Energy	ERGANZ	GridQube	
Network Tasman				
Orion				
Powerco				
Tenco				
Transpower				
Unison and Centralines				
Vector				
Waipā Networks				
WEL Networks				
Wellington Electricity				
Westpower				

1.1 There is a high degree of agreement on the 'direction of travel'

From the submissions that the Authority received, ENA observes that there is a very high degree of agreement on the 'direction of travel' - that better access to network information is a useful and desirable goal. The question is therefore not whether there should be greater HV visibility, but how that should be achieved. To reiterate ENA's submission: we agree that the objective is desirable, but we do not agree that the Authority has justified the specific obligations it proposes, at the proposed level of prescription, timing and cost.

1.2 The claim that the data already exists

There is a reasonably common view, from both the Authority and the (limited) pool of access-seeker responses that the necessary HV network data already exists within EDBs, and therefore the obligation to publish this information is relatively straightforward.

In practice, this is not the case. Even where EDBs do hold reasonably robust and comprehensive sets of HV network topology and asset information for internal purposes, that is still very far from being appropriate to make available publicly. In addition, data such as:

- forecast hosting capacity,
- forecast export capacity,
- circuit-level reliability metrics,
- flexibility valuations,
- quarterly update processes, and
- publication systems

simply do not universally exist in a form that can be published, and the effort required to produce this for that purpose is far from trivial.

1.3 The claim that the costs are not highly material

Building on the point above, access-seeker submissions also agree with the Authority's assertion that the costs involved in the provision of HV network data are not highly material. Helpfully, ERGANZ notes:

> *"…that the cost-benefit analysis is entirely qualitative…"*

and then encourages the Authority to:

> *"…sharpen its analysis where it can, and to keep costs proportionate…"*

ENA entirely agrees with and endorses this view, but we go further than ERGANZ to say that the proposals should not proceed in the absence of a more robust and quantified cost-benefit analysis from the Authority. Given that there are many network visibility tools already made available by EDBs in New Zealand, there should be no paucity of readily available data and evidence to support such an analysis. It is worth re-emphasising that whatever the costs of developing the capabilities described in the Authority proposals, these will very largely be borne by existing electricity consumers on those networks (largely residential consumers), not the access-seekers that are most likely to receive the benefit of these new capabilities.

1.4 Technical specifications must precede implementation obligations

Several submissions emphasise the importance of technical specifications in determining the cost, feasibility and usefulness of the proposed obligations. ENA agrees. If the Authority proceeds, implementation timeframes should not begin until final specifications have been published and EDBs have had a reasonable period to assess, plan and implement the required changes. Otherwise, EDBs risk incurring rework costs, particularly where they have already developed or are developing visibility tools.

1.5 The claim that regulation is needed because voluntary approaches will produce gaps

ERGANZ also raises concerns with allowing a voluntary approach to provision of HV network data to proceed without intervention, as this creates a risk of fragmentation:

> *"Voluntary and guidance-based approaches would produce inconsistent uptake and gaps in coverage, which is precisely the fragmentation problem the proposal is intended to solve."*

As ENA noted in its submission, there is already a significant amount of network visibility tools in existence, with more being actively under development by EDBs. In those places where network visibility tools are not in place or in development, the Authority has not established that there is significant unmet demand sufficient to justify mandatory obligations. To the extent fragmentation is a genuine concern, the Authority has not assessed the cost of addressing it. In particular, if mandatory specifications require existing tools to be rebuilt or materially reworked, the resulting compliance cost could outweigh the incremental benefit. In addition, we have not seen evidence that there exists a significant pool of access-seekers for which cross-network (as opposed to within network) comparison is highly beneficial.

1.6 The case for inclusion of non-network solutions

Many submitters, including Transpower and Powerco, agree with ENA that the case for including non-network solutions (NNS) and flexibility valuations in the mandated information has not been made. Even ERGANZ, while supportive of the concept, identifies significant unresolved questions about the operation, status and commercial implications of the proposed price-for-alternatives requirement. The Authority should not proceed with clause 6.3(3B)(d)–(e) as part of this network visibility amendment. Even supportive access-seeker submissions identify unresolved questions about legal status, commercial sensitivity, interaction with procurement processes, gaming risk and whether prices could distort genuine procurement. These are significant questions, and the whole topic of signalling and procurement of NNS by EDBs requires substantial policy consideration and development. For these reasons it should be addressed in a separate flexibility/NNS workstream, which ENA understands the Authority is developing in any case.

2 Conclusion

ENA's cross-submission has highlighted some of the areas from other parties' submissions where we find there is broad agreement on some aspects of the Authority's proposals, or conversely, where we see assertions we disagree with and wish to directly address. ENA's key messages from our main submission remain:

- 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.

If you have any questions about ENA's cross-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