

3 November 2025

Electricity Authority
PO Box 10041
Wellington 6143

Submitted via email: distribution.feedback@ea.govt.nz

To whom it may concern,

Electricity Networks Aotearoa (ENA) is the industry membership body that represents the electricity distribution businesses (EDBs) that take power from the national grid and deliver it to homes and businesses (our members are listed in Appendix B).

EDBs employ over 7,800 people, deliver energy to more than two million homes and businesses, and have invested \$6.2 billion in network assets over the last five years. ENA harnesses members' collective expertise to promote safe, reliable, and affordable power for consumers.

We welcome the opportunity to provide feedback to the Electricity Authority (the Authority) on the *Improving visibility of significant distributed generation and load projects: clause 2.16 information notice* consultation paper (the paper).

ENA supports the Authority's objective of providing improved transparency for connecting parties and stakeholders on the status of significant load and generation connections to the electricity networks. Our feedback on the paper is therefore focused on ensuring that any new obligations placed on the EDBs are useful, practical and avoid (to the greatest extent possible) unnecessary duplication of effort. We would like to see the Authority:

- Ensure that the information required from EDBs is consistent with that required to published in individual EDB connection pipelines, as per recent decisions in the Authority Network Connections Project (Stage One).
- Ensure that the confidentiality requirements applied to this information, for both the requirements in this proposal and the individual EDB connection pipelines, is consistent. In addition, the confidentiality requirements should be consistent from application to application as well.
- Introduce these new reporting requirements in a phased manner – starting quarterly and moving to monthly after an initial implementation period (say 1 year).
- Delay introduction of these proposed requirements until the corresponding requirements for individual EDB connection pipelines come into effect.
- Consider whether the apparent duplication of effort – individual EDB connection pipelines and an aggregated national connections pipeline – is prudent. Is there a more efficient way to achieve the outcomes the Authority is seeking here?

Our responses to the specific consultation questions are included (in the Authority's preferred format) as Appendix A of this submission.

We're very happy to discuss the Authority's proposals in the paper further, if that would be of use to you. Please contact Richard Le Gros, Policy and Innovation Manager (richard@electricity.org.nz), in the first instance.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Richard Le Gros', with a long, sweeping underline.

Richard Le Gros

Policy and Innovation Manager

Electricity Networks Aotearoa

Appendix A: ENA feedback to Authority paper

Format for submissions

Improving visibility of significant distributed generation and load projects - clause 2.16
information notice

Submitter	Richard Le Gros, Electricity Networks Aotearoa
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Question	Comments
Q1. Do you agree with the Authority's proposal to require monthly provision of information to the Authority, to enable a 'rolling' set of information?	ENA is concerned that the Authority's proposal to require information from EDBs, such that it can publish a national picture of significant load and generation connections, will duplicate the requirement on EDBs to publish similar pipelines individually. We are not persuaded that the benefits of requiring both a national and network-specific set of connection pipelines outweigh the costs involved. We suggest that the Authority give priority to one or other approach in terms of its regulation of the sector. If the need for a national connection pipeline is seen as the prevailing one, then the requirement for EDBs to publish network-specific pipelines should be withdrawn (EDBs could still publish these voluntarily if they wish).
Q2. Do you agree with the proposed kW/kVA thresholds for inclusion of projects under the proposed notice?	ENA agrees that the proposed thresholds are appropriate for inclusion in a national distribution connection pipeline as these align with the decisions related to large load and large distributed generation (DG) process changes. We further think that these are the lowest thresholds that could practically be required for reporting.

Question	Comments
Q3. Do you think smaller projects should be included under the proposed notice?	The Authority's stated objective for this proposal is to support: • competition – by creating a level playing field for access to information that informs investment decisions • reliable supply – by better enabling assessments of whether upcoming new generation is sufficient to meet expected demand, and for the Authority and industry to respond appropriately • efficient operation – by providing better information to investors and industry participants to help ensure the right investment happens at the right time and in the right place. Inclusion of smaller projects (generation or load) would not make a material difference to the achievement of these objectives as the actual quantity of load/generation contained in those projects is trivial, from a national perspective. ENA therefore does not think smaller projects should be included in the proposed notice.

Question	Comments
Q4. Do you have any comments on the proposal to require developers (via distributors) to provide increased information on their generation and load projects?	If this obligation requires EDBs to gather information from developers that they would not otherwise require, then this requirement represents a new burden on both developers and EDBs which is otherwise unnecessary for the application to proceed. If the developer is unable or unwilling to furnish the EDB with the information sought by the Authority – but which is otherwise unnecessary for the application to proceed – should the EDB reject the application? Does the Authority anticipate amending the Code such that EDBs are empowered, under the scenario above, to reject developer applications? This seems to put EDBs in an inimical position – having to gather information on behalf of a third-party (the Authority) which they themselves do not require and presumably having to refuse to provide services to their customers (developers) that they would otherwise wish to offer, if that information is not forthcoming. The Authority should therefore provide clear and consistent guidance on what specific information developers are required to provide, how that information should be submitted, and who retains ownership of the data so that this can be incorporated into the development of the digital systems that underpin the connection processes currently being developed. The Authority should also specify how consent is obtained from developers for data sharing, particularly where commercially sensitive project details are involved so that all parties are aware of what is expected. There may also be a need for different levels of visibility as projects progress through pipelines.

Question	Comments
Q5. Do you have any comments on the proposal to require distributors to provide information that might be classified as confidential?	ENA has some concerns about the scope for developers to determine which elements of their connection applications should be treated as 'confidential' by EDBs – and we have flagged these concerns to the Authority in our response to the recent technical consultation on the Network Connections Project (Stage One) decisions. We further note that the proposed file format and clause 2.16 information notice do not appear to contain any flag to identify confidential information. It's therefore difficult to determine how the EDB (on behalf of the developer) would communicate the confidential status of information to the Authority. One way to address this uncertainty would be for the Authority to ensure consistency in the scope, identification and treatment of confidential information that EDBs are obliged to gather from developers and potentially publish themselves and/or pass on to the Authority.
Q6. Do you agree with the Authority's proposal to publish aggregated information, and do you have any comments on how to best maintain confidentiality while providing as much transparency as possible?	Whatever measures the Authority takes to maintain confidentiality, and wherever it chooses to draw the line to ensure as much transparency as possible, this should be consistent with the information EDBs are obliged to provide or treat as confidential, in their own connection pipeline.
Q7. Do you agree with the Authority's proposal to aggregate some information provided by distributors to assess the status or stage of projects, and do you have any comments on the breakdown of the proposed stages?	ENA is currently leading a project – as required by decisions on the Authority Network Connections Project (Stage One) – to develop a connection and queue management policy for the distribution sector. It would be sensible to align the project status or stage information with the milestones that will be prescribed in that policy, once available.

Question	Comments
Q8. Do you have any comments on when the data collection should commence?	ENA is concerned that the requirement for EDB to begin monthly reporting immediately upon commencement of these requirements is overly onerous, as EDBs are unlikely to have established their individual connection pipeline publication processes at this time. In addition, it seems unlikely that the outcome of this consultation will be known before December 2025. Assuming EDBs began work immediately on amending connection processes, connection application forms, business information systems, etc, they would have approximately two months – which span Christmas and New Year holidays – to complete this work to meet a 1 February 2026 deadline, which is what is presented in the ‘Proposed Notice’ in Appendix A of the consultation. This is entirely unreasonable and unrealistic. We instead suggest the Authority begin with a requirement to report quarterly, that commences at the same time that the requirement for EDBs to publish individual connection pipelines begins. The reporting frequency can then be increased to monthly after e.g. a year of operation. Aligning the commencement of the reporting obligation in this way will allow EDBs to exploit efficiencies and synergies across these two largely identical information gathering requirements. The initial lower frequency of reporting will also allow any inconsistencies or inefficiencies in the data gathering process to be ironed out while the report frequency is less onerous.
Q9. Do you think data collection for DG and load should commence at the same time?	Provided the information aligns with the information that EDBs will be publishing in their individual connection pipelines (which will also contain both large load and large DG connections), then we think it makes sense to include both.

Question	Comments
Q10. Do you agree the benefits of the proposed clause 2.16 notice outweigh its costs? If not, what area(s) of the Authority's preliminary assessment of benefits and costs do you disagree with?	Costs can be minimised by ensuring that the requirements for information to be provided to the Authority under this proposal are consistent with those that will apply to information published by EDBs in their individual connection pipelines. As per our response to question 4, we expect that there will be some cost implications for both EDBs and developers to provide and gather information in the connection application process that they would not otherwise require or have to provide. We suggest the Authority give further consideration to whether requiring both of these connection pipelines (individual EDB pipelines AND a national aggregated pipeline) is necessary to achieve the outcomes and benefits being sought.

Question	Comments
Q11. Do you agree the proposed clause 2.16 notice 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 Act.	The Authority has defined the problems in several parts. The problems appear to be: 1. While distributors will be required to publish these queues on their websites under our new Network Connections Project (Stage One) requirements, this will not provide a centralised source of information on the entire national pipeline 2. Distributors are also not required to publish the level of detail on project status needed to inform regulatory changes 3. Lack of consistently available and up-to-date information about planned investment, including at the distribution level, creates uncertainty for prospective developers, which in turn reduces investment (in the longer term) and increases prices. As noted in this submission, the clause 2.16 information notice competes with (rather than compliments) the obligation for each EDB to publish a connections pipeline. From the problem statement, it is clear that the clause 2.16 information notice should <u>replace</u> the proposed Code change requiring EDBs to publish individual connection pipelines. Otherwise there is a duplication of effort and duplication of publication, undermining the goal of improving sector efficiency and consistency. In other words; the clause 2.16 information notice is preferable to amending the Code, and should replace the proposed Code amendments requiring EDBs to publish the information being provided to the Authority. The clause 2.16 information notice provides a clear, legally supported mechanism for data collection without the rigidity of a Code amendment, allowing the framework to evolve through guidance and engagement rather than requiring regulatory change processes.

Question	Comments
Q12. Should the Authority consider further work to monitor and assess the pipeline of new generation and demand?	The Authority should describe some clear ‘use cases’ for the new generation and demand pipeline it proposes to establish, using the information gather via the proposed notice. Once in place, the Authority should then monitor and assess whether the pipeline of new generation and demand is delivering against those use cases, and the benefits associated with each. If the proposal fails to realise those use cases, or does so only partially the Authority should re-consider the scope or even necessity of this information notice.

Q13. Do you have any comments on the drafting of the proposed notice?

There are some opportunities to improve the draft notice:

1. The notice requires provision of three 'layers' of information. It is not clear how each 'layer' of information will be identified or what a 'compliant' file content looks like.
2. The notice sets the expectation that this will be created using Excel, however the file content expects data formatting that Excel does not readily handle, for example needing to report kV to 3 decimal places. In many cases Excel will 'remove' any superfluous zeros, so 33.000 kV will become 33 kV or 0.400 kV will become 0.4 kV. This will lead to non-compliant files, and it is recommended that the Authority relax its file format rules to reflect how Excel and manual processes will handle this information, particularly where the level of granularity requested is unlikely to provide meaningful information.

3. The filename requires the EDB to include the date and time the file is submitted (*YYYYMMDD-HHMM). This is not practical as it is likely the files will be manually created and will undergo a review process before submission.

I recommend the filename be amended to have a version number rather than a date-time format that will not be realistic to comply with. For example DistributorInvestmentPipeline-yyyymmdd-V1.csv or DistributorInvestmentPipeline-yyyymmdd-V2.csv, for a replacement file correcting information in a previous version of the disclosure.

4. As noted in this submission, there is no mechanism to communicate or flag confidential information. This creates a manual handling risk, where confidential information may be released as the notice and rationale is not part of the file that contains the data.
5. It would be more efficient to use existing SFTP systems for the transfer of this data. The Electricity Registry Hub already exists for the purpose of transferring confidential information between industry participants (and the Authority), so would be an ideal solution rather than having to develop a new system to replicate this functionality.

Question	Comments
	6. The following three fields: MaximumExportCapacityMegawatts, GenerationActualCapacityMegawatts, GenerationPeakCapacityMegawatts, seem somewhat interrelated and interchangeable. Some worked examples from the Authority showing how this information would be gathered from developers and then passed on to the Authority by the EDB could help to clarify this. 7. Much of the information requested under the 'project stage' section is unnecessary from an EDB perspective (e.g. land negotiation, consents and finance) and we're not sure they will add a lot of value to the information the Authority intends to publish either. If the purpose is (as per the consultation material) to 'inform project stage' information, then we think this purpose has already been achieved with the information required under Developer and location information where it requires Part6A application stage information and reason for delay. Within reason for delay, EDBs already need to disclose whether it's due to consent, or finance, etc.

Appendix B: ENA Members

Electricity Networks Aotearoa makes this submission along with the support of its members, listed below.

- Alpine Energy
- Aurora Energy
- Buller Electricity
- Centralines
- Counties Energy
- Electra
- EA Networks
- Firstlight Network
- Horizon Energy Distribution
- MainPower NZ
- Marlborough Lines
- Nelson Electricity
- Network Tasman
- Network Waitaki
- Northpower
- Orion New Zealand
- Powerco
- PowerNet (which manages The Power Company, Electricity Invercargill, OtagoNet and Lakeland Network)
- Scanpower
- The Lines Company
- Top Energy
- Unison Networks
- Vector
- Waipa Networks
- WEL Networks
- Wellington Electricity Lines
- Westpower