

Appendix B Submission form

Improving information on high-voltage network capacity

Submitter	Buller Electricity Limited
-----------	----------------------------

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.	Generally agree. Improved visibility of high-voltage network capacity will support more informed connection and investment decisions. For smaller distributors, existing information is often sufficient for current connection volumes, so the incremental benefits may be more modest.
Q2. Do you agree the issues identified by the Authority are worthy of attention? If not, please explain why.	Yes. As distributed generation, electrification and flexibility services grow, consistent access to network capacity information will become increasingly important.
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?	Yes. A proportionate approach focused initially on high-voltage networks is appropriate and should limit implementation costs.
Q4. Do you agree with our assessment of the outcomes that network visibility supports? If not, why not?	Yes. Better visibility should improve planning, reduce speculative enquiries and support more efficient network utilisation.
Q5. Do you consider the proposed amendments to Part 6 of the Code would promote the Authority's statutory objective? If not, why not?	Yes. The proposed amendments are likely to promote competition and reliable supply by improving transparency and reducing information asymmetries.
Q6. Are there any matters you believe are missing from the proposed Code amendment? Please specify.	Consideration should be given to proportionality for smaller distributors and ensuring reporting obligations remain cost-effective.
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.	The proposed timeframe appears reasonable, provided adequate time is allowed for specification development, system changes and testing.
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?	We support the use of technical specifications. This provides flexibility to refine requirements over time without frequent Code amendments.
Q9. Do you consider that the proposal to develop network visibility specifications in consultation with interested parties would be effective? If not, why not?	Yes. Industry consultation will be important to ensure specifications are practical, proportionate and aligned with existing data capabilities.
Q.10. Is the proposed timeframe for developing the specifications likely to be sufficient?	
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.	Yes. High-voltage networks are the logical starting point as capability and data quality are generally more mature.

Q12. Do you agree with the assumptions the Authority has made? Why/Why not?	The assumptions appear reasonable overall. However, benefits and costs may vary significantly between large and small distributors.
Q13. Have we correctly identified the benefits of network visibility?	Yes. The key benefits appear to have been identified.
Q14. Do you have any information that might help quantify the value of these benefits? If so, please provide this information.	No additional information to provide.
Q15. Have we correctly identified the costs of network visibility?	Generally yes. Ongoing compliance, data management, publication and quality assurance costs should continue to be monitored.
Q16. Do you have any information that might help quantify the costs? If so, please provide this information.	No additional information to provide.
Q17. Have we correctly identified the regulatory overlaps?	Generally yes. There are potential overlaps with Commerce Commission information disclosure requirements and other reporting obligations.
Q18. Do you agree with our assessment that there is a net benefit notwithstanding any regulatory overlap? If not, why not?	Yes. Provided overlaps are minimised, the proposal is likely to deliver a net benefit.
Q19. Do you have any information that might help quantify the costs and benefits associated with the regulatory overlap? If so, please provide this information.	No additional information to provide.
Q20. Do you agree that the Authority should consider reducing the regulatory overlap as the proposed specifications are developed?	Yes. Reducing duplication should be a priority during specification development.
Q21. Do you agree with our assessment that there will be net benefit from the proposed amendments? If not, why not?	Yes. On balance, the benefits are likely to exceed the costs.
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.	Yes. The proposed approach appears preferable to alternatives because it delivers improved visibility while limiting initial scope to high-voltage networks.
Q23. Do you agree the Authority's proposed amendments comply with section 32 of the Electricity Industry Act?	Yes. We agree with the Authority's assessment.
Q24. Do you have any comments on the drafting of the proposed amendment?	No specific drafting comments. We encourage clear definitions, consistent terminology and flexibility to accommodate different distributor circumstances.
Please indicate if you wish to be consulted during the development of the technical specifications supporting the proposed Code amendment.	Yes, Buller Electricity would welcome the opportunity to be consulted during development of the technical specifications.