

## Appendix B Submission form

### Improving information on high-voltage network capacity

Submitter	Counties Energy
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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.	Agree
Q2. Do you agree the issues identified by the Authority are worthy of attention? If not, please explain why.	<p>Mostly agree.</p> <p>Counties Energy has already published a Capacity Map on its website that provides most of the information requested by the Authority in this consultation, and we believe there is adequate justification for the investment so far. This was a significant investment made of time and resources (where the cost socialised to the wider customer base) and we are yet to see the uptake/usage of the current capacity maps from access seekers.</p> <p>We are currently collecting evidence to show that the Capacity Maps is bringing additional or new customers into the network and there is a payback to the wider customer base.</p> <p>We would like to better understand the business case for developing the additional functionalities requested. The requested additional functionality has a further cost associated to it. This cost would be material and would be socialised across the entire customer base, for the benefit only for a few access seekers, becoming a cross-subsidy. Counties Energy suggest that the Authority consider a more cost-reflective approach, especially when affordability and cost of living is high priority for our customers and community.</p> <p>Counties Energy wishes to take an evidence-based approach and we have not seen/collected the evidence on the suggested approach.</p> <p>The access seekers that Counties Energy believes are being referenced by the Authority in this consultation paper are a segment of large corporates and energy users (or planned future energy users) and not the general residential customer.</p> <p>Access seekers today can directly engage with Distributors for Discovery works / High-level Assessments. Counties Energy believes this is a better way for this small subset of large-scale corporate access seekers to engage with the local distribution company.</p> <p>We acknowledge this has created a variety of outcomes in the past across network companies. However, initiatives in flight (such as Streamlining Connections and other work by the ENA) should address these issues.</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?	Agree
Q4. Do you agree with our assessment of the outcomes that network visibility supports? If not, why not?	Agree
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
Q6. Are there any matters you believe are missing from the proposed Code amendment? Please specify.	No
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>The 15<sup>th</sup> September 2027 deadline provides adequate time to provide the necessary information on:</p> <ul style="list-style-type: none"> <li>• Location of high-voltage circuit</li> <li>• Design capacity of each circuit</li> <li>• Forecasted capacity of each circuit</li> <li>• Forecasted export capacity of each circuit</li> <li>• Historical network reliability</li> </ul> <p>However, it doesn't provide EDBs with adequate time to provide the alternatives to network reinforcement and the price EDBs would be willing to pay for these as a service. This issue is not with providing the data, it's with the perception with which the market will treat that as a final/true value.</p> <p>Determining this value requires a systemic change within EDBs planning, engineering and regulatory/pricing functions. The values need to be trialled, tested and validated, to avoid potential duplicate investment or an erosion of flexibility value because of a change in the demand forecast. This requires more thought and a thorough feasibility study per planned reinforcement project to provide a degree of accuracy that an EDB would be comfortable to follow through on. An alternative might be to consider flagging areas on the capacity map where flexibility would be beneficial and a non-binding value for that service by 15<sup>th</sup> September 2027 deadline. With the true value of flexibility to be negotiated through a formal procurement process with between EDBs and the market.</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?	The issue again here is not technical, rather than the treatment by access seekers that these values are final rather than indicative. This has the opportunity to potentially create misunderstandings, especially as new connection (both DG and load) request are processed.
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
Q.10. Is the proposed timeframe for developing the specifications likely to be sufficient?	Yes
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.	Agree

Q12. Do you agree with the assumptions the Authority has made? Why/Why not?	Counties Energy agrees with assumptions (a) and (b), however not with (c) and (d). Given our experience with the segment of access seekers that this Capacity Maps are intended to be used by, it is unlikely, in our view that they will more efficient connection decisions or consider the use of flexibility solutions. Points discussed in (c) and (d) are normally more involved conversations with the customer which go beyond simplified and static capacity maps.
Q13. Have we correctly identified the benefits of network visibility?	Similar to the response on Q12, Counties Energy believes that given the segment of customers/access seekers using the Capacity Maps would not gain benefits 5.47(a), 5.47 (b) or 5.48. We agree that there are benefits from 5.47(c). Regarding the secondary benefits to the distributor covered in 5.49, 5.50 and 5.51; we already have this data, we are just presenting it in a customer friendly way (i.e. for a different audience), so there is no added benefit by doing this for our planning and engineering teams.
Q14. Do you have any information that might help quantify the value of these benefits? If so, please provide this information.	We are still in the process of collecting this information from the market as Counties Energy wishes to take an evidence-based approach, given our Capacity Maps service has only gone live earlier this year, and still in the evidence collection phase. It would be pre-mature to share this data at this stage.
Q15. Have we correctly identified the costs of network visibility?	Yes
Q16. Do you have any information that might help quantify the costs? If so, please provide this information.	At this point Counties Energy is unable to provide information to help quantify costs, but it would be fair to assume that this is not a small task.
Q17. Have we correctly identified the regulatory overlaps?	Yes
Q18. Do you agree with our assessment that there is a net benefit notwithstanding any regulatory overlap? If not, why not?	Yes
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.	No
Q20. Do you agree that the Authority should consider reducing the regulatory overlap as the proposed specifications are developed?	Disagree
Q21. Do you agree with our assessment that there will be net benefit from the proposed amendments? If not, why not?	There appears to be inadequate quantifiable and directly relatable benefit provided in the consultation to make such a judgement.  Counties Energy wishes to take an evidence-based approach and we have not seen/collected the evidence on the suggested approach.
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.	Agree
Q23. Do you agree the Authority's proposed amendments comply with section 32 of the Electricity Industry Act?	Agree

Q24. Do you have any comments on the drafting of the proposed amendment?	Proposal to delay the implementation of clause 3B (e) from this round of code amendments.
Please indicate if you wish to be consulted during the development of the technical specifications supporting the proposed Code amendment.	Yes, Counties Energy wishes to be consulted during the development of the technical specification.