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Submissions
Electricity Authority
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ERGANZ SUBMISSION ON IMPROVING INFORMATION ON HIGH-VOLTAGE NETWORK CAPACITY

The Electricity Retailers' and Generators' Association of New Zealand (ERGANZ) welcomes the opportunity to comment on the Electricity Authority's consultation paper, 'Improving information on high-voltage network capacity'.

ERGANZ is the industry association representing companies that generate and sell electricity to Kiwi households and businesses. Collectively, our members supply almost 90 per cent of New Zealand's electricity. We work for a competitive, fair, and sustainable electricity market that benefits consumers.

Executive summary

ERGANZ supports the proposed Code amendment. Improving network visibility is a clear step towards a transparent, digitalised distribution system that supports competition, efficient investment and the reliable supply of electricity. We support efforts to lift the capability and performance of network management, and we encourage the greater use of, and stronger incentives for, distributed energy resources and flexibility.

ERGANZ particularly supports:

- the requirement for distributors to publish standardised, machine-readable high-voltage capacity information through both interactive maps and downloadable, API-enabled data;
- the move from largely annual to quarterly updates, and the requirement to disclose methodology and confidence levels;
- the proposal's explicit objective of reducing the information advantage a distributor, or its related parties, may hold, which we consider essential to a level playing field; and
- the phased, high-voltage-first approach, which sensibly leverages capability that distributors already have.

ERGANZ encourages the Authority to:

- treat genuine national consistency as the central design goal, since the value of the proposal to members operating across all networks depends on comparable formats and common data standards rather than 29 divergent implementations;
- clarify the operation and status of the proposed requirement for distributors to indicate the price they would pay for alternatives to network reinforcement;
- keep costs proportionate and encourage shared services and collaboration between distributors, recognising that distributor costs reach consumers through lines charges;
- reduce regulatory overlap with the Commerce Commission's information disclosure regime as the technical specifications are developed; and
- commit now to a clear pathway, criteria and indicative timeline for extending visibility to low-voltage networks, where much of the wider distributed energy and consumer-flexibility opportunity sits.

Submission points

ERGANZ agrees with the Authority's diagnosis of the problem. The information distributors currently disclose is relatively infrequent, high-level, inconsistent across distributors, hard to discover and rarely available in digital or interactive form. We agree these limitations leave access seekers without the information they need to make efficient connection and investment decisions, and that they risk distributors overlooking opportunities to use non-network solutions.

ERGANZ also agrees that now is the right time to act. The pace of electrification and DER uptake means the cost of poor visibility is rising, the data needed for high-voltage visibility largely already exists, and the capabilities involved take time to build on both the distributor and access-seeker sides. Delaying would defer benefits that are already within reach. ERGANZ supports the outcomes the Authority associates with network visibility, in particular better connection decisions, standardised and comparable information, a level playing field, and stronger competition and security of supply.

National consistency

The single most important determinant of value for ERGANZ members is consistency. Members operate across all 29 networks. Where each distributor publishes in a different format, with different definitions and different update cycles, the search and integration costs fall on access seekers and, ultimately, on consumers. This is the same fragmentation problem ERGANZ has raised in relation to distribution pricing across multiple distributors.

We therefore support standardised formats, common terminology and machine-readable data, delivered through both interactive maps and downloadable, API-enabled and GIS-compatible files. The technical specifications are where consistency can be delivered. We encourage the Authority to draft the specifications to require comparable outputs, rather than to permit each distributor to satisfy the requirement in its own way.

Equal access to network information

ERGANZ welcomes the Authority's explicit framing of network visibility as a means of reducing the advantage a distributor, or its related parties, holds from privately held network information. With the Government signalling an intention to lift the threshold for distributor ownership of generation from 50 MW towards around 250 MW, and with distributors and their related parties increasingly active in flexibility and DER markets, equal and simultaneous access to network information matters.

Public disclosure is the right mechanism, because it removes the ability to share non-public information selectively with related parties. ERGANZ encourages the Authority to ensure, through the Code and the specifications, that related parties obtain no earlier or better access to network information than the market generally, consistent with the even-handedness expectation in the Authority's flexibility services guidance.

Export and forecast capacity transparency supports efficient investment

ERGANZ supports the requirements to publish design capacity, forecast load capacity and forecast export capacity for each circuit. For members investing in distributed generation, grid-scale batteries and public EV charging, knowing where headroom exists and where networks are constrained allows better-sited and better-sized projects, and reduces speculative applications. Forecast export capacity is particularly useful for distributed generation decisions, and it signals to flexibility providers where their services would have the greatest value.

The price signal for alternatives to network reinforcement is promising but needs clarity. ERGANZ welcomes the proposal that distributors indicate the extent to which they expect to use alternatives to reinforcement, and the price they would be willing to pay for them. This has real potential to surface a procurement market for flexibility and non-network solutions that member aggregators and DER owners can supply into, and it supports the greater use of DER flexibility that ERGANZ encourages.

The mechanism is novel, however, and the consultation leaves its operation unclear. ERGANZ seeks clarity on whether the indicated price is intended to be purely indicative or in any way binding, how it interacts with distributors' existing flexibility procurement, and how commercial sensitivity is to be managed. We caution against the figure becoming a de facto cap on the value of flexibility, being set in a way that is easily gamed, or chilling genuine procurement.

Support the high-voltage-first approach

ERGANZ agrees with starting at high voltage. It leverages the data and analytical capability distributors already have, lowers cost, and delivers benefits sooner than waiting for low-voltage capability to mature.

We note, however, that high-voltage visibility primarily serves commercial and industrial-scale access seekers, such as large connections, charge point operators, medium-scale generators and battery storage providers, and large developers.

ERGANZ supports the phased approach, but encourages the Authority to commit now to a clear pathway, assessment criteria and indicative timeline for extending visibility to low-voltage networks, so that the system-wide and consumer benefits are not delayed indefinitely. Designing the high-voltage specifications with eventual low-voltage extension in mind would also lower future cost.

Costs should remain proportionate and reflect shared benefits

ERGANZ supports the proposal on the basis that, as the Authority notes, the costs should not be highly material because the proposal largely leverages existing distributor capability for high-voltage networks. We note that the cost-benefit analysis is entirely qualitative, and that the Authority concedes it cannot quantify either costs or benefits. ERGANZ is not in a position to supply quantification, but encourages the Authority to sharpen its analysis where it can, and to keep costs proportionate, recognising that distributor costs are recovered through lines charges paid by consumers.

We support the Authority's encouragement of shared services and collaboration between distributors, and note the recent Counties Energy partnerships with Unison and The Lines Company as examples of how duplication and cost can be reduced.

Regulatory overlap should be minimised

ERGANZ agrees the Authority has correctly identified the areas of overlap with the Commerce Commission's information disclosure regime, including zone substation geographic information, Schedule 12b forecast capacity, and SAIDI and SAIFI reporting. We agree there is a net benefit notwithstanding the overlap, because the proposed information is more granular, more frequent, more visual and more comparable than the existing disclosures deliver.

ERGANZ supports the Authority's commitment to reduce overlap and duplicated distributor effort as the specifications are developed, and its intention to consult the Commission formally. Duplicated effort is a cost that ultimately reaches consumers.

Conclusions

ERGANZ agrees the proposed Code amendment is preferable to the status quo, an industry-led approach, amendments to the Commerce Act disclosure regime, or guidance only. 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.

The indicative September 2027 implementation date appears reasonable, given that distributors already hold the relevant high-voltage data. ERGANZ supports timely implementation, consistent with the principle that the sooner the requirements are in place, the sooner the benefits are realised. Distributors are better placed than ERGANZ to comment on the feasibility of the date itself.

Consultation 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?	Yes. The current information is fragmented, infrequent, insufficiently granular, inconsistent across distributors, and rarely digital. We also agree that distributors generally have good visibility of their high-voltage networks but weaker low-voltage visibility.
Q2. Do you agree the issues identified by the Authority are worthy of attention?	Yes. The limitations are material and will become more acute as electrification and DER uptake accelerate.
Q3. Do you agree with our assessment that now is the time to regulate for network visibility?	Yes. The high-voltage data largely exists already, the cost of poor visibility is rising, and capability takes time to build on both the distributor and access-seeker sides, so timely regulation is warranted.
Q4. Do you agree with our assessment of the outcomes that network visibility supports?	Yes, and we particularly value the level-playing-field, competition and security-of-supply outcomes. We encourage the Authority to give explicit effect to even-handed, simultaneous access to network information for distributor related parties.
Q5. Do you consider the proposed amendments to Part 6 of the Code would promote the Authority's statutory objective?	Yes. The amendment promotes competition in, reliable supply by, and efficient operation of the industry for the long-term benefit of consumers, consistent with the section 15 objective.
Q6. Are there any matters you believe are missing from the proposed Code amendment?	A clear pathway, criteria and indicative timeline for extending visibility to low-voltage networks; clarity on the status and operation of the price-for-alternatives requirement; explicit assurance that related parties obtain no earlier or better access; and confirmation that the specifications will mandate genuinely comparable, machine-readable outputs.
Q7. Is the indicative timeframe for implementing the proposed Code amendment likely to be adequate?	The September 2027 date appears reasonable given distributors already hold the relevant data. ERGANZ supports timely implementation. Distributors are better placed than ERGANZ to comment on feasibility.
Q8. What are your views on the proposed approach where detailed information about the data sets would be contained in technical specifications?	Supported. It is appropriate to hold technical detail in specifications, provided access seekers are consulted and the specifications deliver genuine consistency and machine-readability rather than permitting divergent approaches across distributors.

Q9. Do you consider that the proposal to develop network visibility specifications in consultation with interested parties would be effective?	Yes. ERGANZ supports co-development and wishes to be consulted, representing the access-seeker perspective alongside distributors.
Q10. Is the proposed timeframe for developing the specifications likely to be sufficient?	Six months appears workable. The priority is genuine consistency and usability rather than speed; specifications that leave formats materially divergent should not be finalised simply to meet the timeframe.
Q11. Do you agree with the proposal to start with high-voltage network visibility?	Yes. The high-voltage-first approach leverages existing capability and delivers earlier benefits. We ask that the Authority commit to a pathway and timeline for extending to low voltage, where much consumer-scale DER and flexibility connects.
Q12. Do you agree with the assumptions the Authority has made?	Broadly. The assumption that distributors have good high-voltage data and topology is reasonable. The assumption that access seekers will use the information holds only if it is genuinely standardised, granular and accessible.
Q13. Have we correctly identified the benefits of network visibility?	Yes. ERGANZ particularly emphasises the competition and level-playing-field benefits and the benefits to flexibility and distributed generation investment decisions.
Q14. Do you have any information that might help quantify the value of these benefits?	ERGANZ is not in a position to quantify the benefits, but supports a sharper analysis where the Authority is able, drawing on the experience of early adopters here and overseas.
Q15. Have we correctly identified the costs of network visibility?	Broadly. Costs fall on distributors. We note these are recovered through lines charges paid by consumers, so proportionality matters.
Q16. Do you have any information that might help quantify the costs?	ERGANZ has no specific cost figures to provide. Shared services and collaboration between distributors should be used to minimise costs.
Q17. Have we correctly identified the regulatory overlaps?	Yes. The overlaps with clause 2.5.2A, Schedule 12b, and Schedules 10 and 10a of the ID Determination are correctly identified.
Q18. Do you agree with our assessment that there is a net benefit notwithstanding any regulatory overlap?	Yes. The proposed information is more granular, more frequent, more visual and more comparable than the existing disclosures, so there is a net benefit despite the overlap.

Q19. Do you have any information that might help quantify the costs and benefits associated with the regulatory overlap?	ERGANZ has no quantitative information to provide on the overlap.
Q20. Do you agree that the Authority should consider reducing the regulatory overlap as the proposed specifications are developed?	Yes, strongly. Reducing overlap and duplicated distributor effort avoids unnecessary cost to consumers. ERGANZ supports the intended formal consultation with the Commerce Commission.
Q21. Do you agree with our assessment that there will be net benefit from the proposed amendments?	Yes. On the basis that costs are not highly material, then ERGANZ agrees there is a net benefit.
Q22. Do you agree the proposed amendment is preferable to the other options?	Yes. The status quo, an industry-led approach, amendments to the Commerce Act regime, and guidance only would each deliver inconsistent uptake and coverage gaps. Regulatory backing is needed to secure consistent, timely and useful information across all networks.
Q23. Do you agree the Authority's proposed amendments comply with section 32 of the Electricity Industry Act?	Yes. The amendment is consistent with, and necessary or desirable to promote, the matters in section 32 and the section 15 objective.
Q24. Do you have any comments on the drafting of the proposed amendment?	<p>A few. Clause 6.3A should require genuinely comparable and machine-readable formats. The price-for-alternatives provisions in clause 6.3(3B)(d) and (e) should be clarified as to their status and the treatment of commercial sensitivity.</p> <p>The Code or specifications should give effect to even-handed, no-earlier-access for related parties. The confidence-level disclosure should be specified with enough precision to be comparable across distributors.</p>
Please indicate if you wish to be consulted during the development of the technical specifications supporting the proposed Code amendment.	Yes. ERGANZ wishes to be consulted during the development of the technical specifications.

Conclusion

ERGANZ thanks the Authority for the opportunity to comment on these proposals and for considering our submission.

If there are any outstanding questions or a need for further follow-up, please let me know.

Yours sincerely,

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