

15 June 2026

Electricity Authority
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Dear Electricity Authority Team

Consultation Paper Improving Information on High-Voltage Network Capacity

Westpower appreciates the opportunity to make a submission to the Electricity Authority (**Authority**), on its consultation paper *Improving information on high-voltage network capacity*.

Westpower is a small, consumer-owned Electricity Distribution Business (**EDB**) serving the West Coast of the South Island. Our network spans a geographically challenging and remote region, from Reefton to South Westland.

Westpower operates as a lean and efficient organisation, focused on delivering reliable, affordable electricity to its communities and was honoured to be named the 2025 Electricity Distribution Business of the Year. As a trust-owned EDB, cost efficiency directly benefits local consumers, and our approach is grounded in practical, proportionate solutions that reflect the realities of operating a regional network.

Executive Summary

Westpower does not support the proposed mandatory HV network visibility regime. The Authority has overestimated the benefits, underestimated the costs, and made assumptions about EDB capabilities and access seeker behaviour that do not match reality on a network like ours.

Westpower has three core concerns:

- There is no demand for this type of visibility on the West Coast. Our network is largely unconstrained. The information the Authority wants published would cost us over \$400,000 to produce and would be used by almost nobody. That cost will be passed to consumers.
- Small EDBs must be carved out if this proposal is to go ahead. A one-size-fits-all approach to 28 very different businesses is not good regulation. The obligation, if it proceeds at all, should be limited to networks where congestion is actually a problem and where access seekers have realistic choices about where to connect.
- The case for intervention has not been made. The Authority's cost-benefit analysis is thin. Benefits are asserted rather than demonstrated by evidence. Costs have been significantly understated. The sector is already moving voluntarily where it is needed, and the Authority should let that continue before reaching for the rulebook creating yet further costs that will be borne by consumers.

The case for regulation is weak

The ENA's submission notes that approximately 34% of ICPs nationally are already covered by a live capacity map, with another 51% on networks where projects are underway. That is not a sector in paralysis. That is a sector responding to commercial incentives at its own pace.



Westpower is not in that group because there is no business case to be in that group. Our network is not constrained, and access seekers on the West Coast are not choosing between multiple connection locations based on published hosting capacity data. They are connecting where their mine, farm, or building is.

The Authority's paper conflates two different problems: EDBs needing better visibility of their own networks (which is an operational matter EDBs are already addressing), and the publication of that information to access seekers (which is a disclosure obligation with a very different cost-benefit profile). These are not the same thing, and they do not call for the same regulatory response.

The Authority also has not demonstrated that current disclosure levels are creating material inefficiencies for access seekers. On the West Coast, when someone wants to connect, they call us. We talk to them and tell them immediately what they need to do. That works. A publicly available dataset of fault rates and feeder capacity would not change that process or improve the outcome for anyone.

The cost-benefit analysis is not evidence based

The Authority acknowledges it has limited information to quantify either the costs or benefits of this proposal, yet still concludes the benefits likely outweigh the costs. That is not a sound basis for imposing mandatory obligations on 28 businesses with very different starting points.

The assertion that network data is "in most cases, already available to distributors" misses the point entirely. The existence of underlying data does not mean the systems, processes, and publication tools needed to comply with these obligations already exist. For Westpower, they do not. Our estimates of the cost to implement this proposal is as follows:

- GIS and asset management system modifications: over \$100,000
- Two additional FTEs to populate and maintain the data over two years: approximately \$300,000
- Total cost: over \$400,000 initially, and ongoing for zero measurable benefit to our consumers.

Several EDBs have already deployed capacity map tools. Before imposing mandatory obligations across the whole sector, the Authority should look at those existing implementations and actual user uptake, actual connection outcomes, actual realised benefits. That evidence exists and has apparently not been assessed. If the data does not support the intervention, the intervention should not proceed.

Small EDBs should be carved out

The proposal makes no distinction between Vector, serving Auckland, and Westpower, serving the West Coast. That is not proportionate, nor is it good regulation.

The access seekers the Authority has in mind, are those comparing network connection options across multiple locations. Those data seekers simply do not exist in any meaningful numbers on our network. The West Coast industry is location fixed. The mines are where the resource is. The farms are where the land is suitable. Nobody is deciding between a Greymouth connection and a Christchurch connection based on our published feeder capacity data. The idea that network visibility will drive efficient investment decisions on the West Coast is not grounded in how business in this location actually works.

The Authority should either exempt small or unconstrained EDBs from this obligation entirely, or at minimum allow a threshold-based carve-out where EDBs can demonstrate that



connection demand is insufficient to justify the compliance cost. Westpower would clearly meet that test.

As an alternative if this was to go ahead could be an obligation as simple as a red/orange/green indicator via a basic web page. This is literally all the information our access seekers need at first contact. Anything beyond that comes through our normal connection process, where we do a complete engineering assessment anyway. The proposed regime goes far beyond what is useful, and far beyond what is used, and at great cost.

Technical specifications must come before implementation deadlines

Westpower agrees with ENA's concern about the proposed sequencing. The Code amendments would lock in mandatory compliance deadlines before the technical specifications that determine what "compliance" actually means, have been written.

We cannot plan our systems, budget our resources, or engage external vendors until we know what we are required to produce. If specifications arrive after EDBs have already committed to particular approaches, the result will be expensive rework and delay which is the opposite of what the Authority is trying to achieve.

If this goes ahead, implementation timeframes must not commence until technical specifications are finalised, published, and EDBs have had a reasonable period to plan and resource their response.

Regulatory overlap adds cost with no benefit

The Authority acknowledges overlap with existing Commerce Commission disclosure requirements, but proposes to keep both regimes in place. Westpower does not consider that is reasonable. Where information is already being captured and reported under an established regime, new requirements should align with those existing frameworks, not sit alongside them as a parallel obligation with different definitions, reporting periods, and assurance requirements.

Parallel disclosure systems create confusion for anyone trying to use the information, and they create cost for every EDB trying to produce it. If this proposal proceeds, existing overlapping obligations must be removed. There is no justification for requiring the same information twice.

Non-network solutions should be out of scope

The proposed requirements around alternatives to network reinforcement go well beyond the core purpose of this consultation. Publishing information about future flexibility procurement intentions is fundamentally different from publishing network topology or hosting capacity. It requires EDBs to form, and disclose, forward-looking commercial positions in a market that is still developing.

This should be removed from the current proposal and dealt with separately, through a dedicated workstream that can properly assess the policy, commercial, and regulatory questions involved.

Conclusion

No regulatory intervention is obviously the most sensible approach. However, if the proposals were to go ahead, we urge the Authority to consider the following:

- Carving out small and unconstrained EDBs from any mandatory obligation.



- Allow EDBs with genuine access seeker demand to develop solutions suited to their networks, at a pace that reflects commercial reality.
- Requiring technical specifications to be finalised before any implementation deadline starts running.
- Removing requirements around non-network solutions from this workstream.
- Eliminating regulatory overlap rather than adding to it in the form of one disclosure system, not two.
- If simple red/orange/green indicators are genuinely what access seekers need, regulating for that, and nothing more.

In conclusion, our network does not need a \$400,000 compliance exercise to tell access seekers what a five-minute phone call already achieves. Westpower urges the Authority to focus any intervention on networks where congestion is real and access seeker choice is genuine, and to leave small EDBs to serve their communities without this burden and cost which consumers will bear.

Yours faithfully

Lisa Leyland
Regulatory and Legal Manager



Appendix B Submission form

- Improving information on high-voltage network capacity

Submitter	Westpower Limited
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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.	No. In large networks with many constrained feeders there may be a need for more detailed information. For smaller networks with largely unconstrained feeders the current disclosure information is sufficient to provide basic information. In all cases, detailed engineering assessment is required for new connections so communication with access seekers can be provided at the initial application.
Q2. Do you agree the issues identified by the Authority are worthy of attention? If not, please explain why.	No. Regulation is not necessary across the board. A targeted response is more efficient and EDBs that seen benefits in providing such information are already doing so. There is no cost/benefit advantage for unconstrained networks to provide the vast level of detail proposed. It is simply unjustified cost that will have to be passed onto consumers. Over time, technologies can be shared to lower costs that will encourage further uptake.
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?	While now might be the time to "sow the seed", the proposed implementation dates are far too early. EDBs should be provided with the time required to set up such systems, and the level of detail published will depend on the congestion on the network. If a network is not constrained, no further information is required. Forecasting connection information is not reliable unless details are provided by access seekers.
Q4. Do you agree with our assessment of the outcomes that network visibility supports? If not, why not?	No. Investment decisions around location of connections are made on far more important information such as the cost of the electricity, access to markets, transport opportunities, labour availability, land costs and many more.
Q5. Do you consider the proposed amendments to Part 6 of the Code would promote the Authority's statutory objective? If not, why not?	Not for small, unconstrained EDBs. The Authority's statutory objective requires it to promote efficient outcomes for the long-term benefit of consumers. Imposing a \$400,000 compliance cost to publish data that no access seeker on our network will meaningfully use does not meet that test. Efficient regulation is targeted regulation.
Q6. Are there any matters you believe are missing from the proposed Code amendment? Please specify.	Yes: a carve-out mechanism for small or unconstrained EDBs. The Code as drafted applies the same obligations to Westpower as to Vector. That is not proportionate. A threshold-based exemption based on network size, congestion level, or volume of connection enquiries would allow the regulation to achieve its purpose without imposing unjustified costs on small EDBs and their consumers. If the changes go ahead, the level of detail proposed would not be well understood by access seekers. Access seekers need basis yes or no answers to the question of 'can we connect'. A simple red, orange and green coloured feed would provide sufficient information at first glance. More detail can then be provided on request. Many access seekers would be at the early stage of their developments and would be unable to provide sufficient information to the EDB to provide a simple answer.



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.	No. The timeline is inadequate. Many EDBs do not have all the information proposed in digital form suitable for publication, and would require a large resource to deliver. This is at a time there are many new regulatory requirements being placed on EDBs within the same timeframe. It is not a matter of saving cost. It is a simple matter of available resources.
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?	Access seekers do not have the level of expertise at first glance to understand the information disclosures proposed. It would not be until well down their investigation process that experts would be involved and at that stage, applications would have been considered by EDB. There is therefore an assumption by the Authority around timing of information and the level of information required. These proposals do not consider such timing, meaning the level of detail provided is unnecessary, as that amount of detail would come at the face-to-face consultation period.
Q9. Do you consider that the proposal to develop network visibility specifications in consultation with interested parties would be effective? If not, why not?	No. The expectations of access seekers and the timing of the receipt of such information in the initial stages is far greater than reality. Interested parties expect so much information for free, and it is unclear why EDBs are expected to provide this information at their own cost. Consultation would only be effective if the interested parties that want this information are prepared to contribute to the cost of providing it.
Q.10. Is the proposed timeframe for developing the specifications likely to be sufficient?	No. There are many regulatory matters requiring EDB resources and this proposal would consume vast resources that are simply not available in this timeframe.
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.	No. There is a perception that all EDBs have HV network data available and capabilities now. EDBs have not been consulted on availability and capabilities, so it is uncertain where the Authority derives this assumption. EDBs could potentially collaborate on common solutions but the proposed timeframes would not allow that to happen.
Q12. Do you agree with the assumptions the Authority has made? Why/Why not?	No. The assumptions are far from fact: <ul style="list-style-type: none"> (a) SCADA is a control system that might be capable of collecting data but does not necessarily collect data. (b) The proposed information is not readily available digitally and the cost of developing IT systems appears to be overlooked. (c) Behind-the-meter capability response to EDB tariffs is very limited as the industry moves to fixed charges. (d) The Authority refers to EV charging stations as examples that have choice of position but totally ignores fixed locations such as mining that are predetermined operations.
Q13. Have we correctly identified the benefits of network visibility?	No. There is an assumption that location decisions will be made simply by downloading EDBs' information. They may be a factor but a very long way down the decision process of the business as previously described. Network studies will always be required for new connections once a project is further developed. For first-glance information, the proposals are far too detailed where a simple red, orange, green colour system would be sufficient.
Q14. Do you have any information that might help quantify the value of these benefits? If so, please provide this information.	Yes. Systematic and ongoing network hosting capacity analysis would not lead to lower overall network costs as this is developed in the EDB's AMP. Publishing the data just adds to the cost. It does not reduce it. There is very little forward planning provided by access seekers so there is little benefit to EDBs in long term planning.



Q15. Have we correctly identified the costs of network visibility?	No. The costs have been materially underestimated. The assumption that data is "already available" does not account for the systems work required to make that data publication ready in a standardised format. GIS modification, data governance processes, ongoing maintenance, and staff time are all real costs that add up quickly for a small EDB.
Q16. Do you have any information that might help quantify the costs? If so, please provide this information.	GIS and Maximo systems are extremely costly to modify as demonstrated with requirements to meet other regulatory requirements for April 2026. Westpower estimates more than \$100,000 to modify systems and two new FTE to populate and publish data over a 2-year period. In total this would be a sum of \$400,000 of expense for zero benefit to its consumers.
Q17. Have we correctly identified the regulatory overlaps?	Broadly yes, but the practical burden of overlapping regimes has been understated. Even where the underlying information is similar, different definitions, reporting periods, and assurance requirements mean separate processes must be maintained. This is particularly problematic for the proposed quarterly SAIDI/SAIFI reporting, which uses different parameters from the Commerce Commission's established information disclosure regime.
Q18. Do you agree with our assessment that there is a net benefit notwithstanding any regulatory overlap? If not, why not?	No. For the net benefit is clearly negative. The costs are concrete and quantified. The benefits are speculative and, on our network, unlikely to materialise. Maintaining two overlapping disclosure regimes adds cost with no corresponding benefit.
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.	There is no benefit in dual disclosure systems. The cost is administrative time and system complexity. The current disclosure framework is adequate. If this proposal proceeds, the existing overlapping obligations must be removed.
Q20. Do you agree that the Authority should consider reducing the regulatory overlap as the proposed specifications are developed?	Yes. This should be a firm commitment, not a consideration. One disclosure system, aligned to existing Commerce Commission frameworks where applicable, is what the sector needs.
Q21. Do you agree with our assessment that there will be net benefit from the proposed amendments? If not, why not?	No. The proposed amendments go far beyond the information access seekers need to make an informed decision in their initial stages of development. They will not provide more efficient networks as this work is already undertaken in AMP developments. More regulation does not lead to better regulation. Ad-hoc regulation such as this proposal and other similar regulation simply adds costs that will not benefit system-wide benefits to consumers, yet sadly they will be the ones that pay for this.
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.	No. The preferred option is to allow EDB to develop systems that best suit their consumers. If the cost/benefit studies are positive, information systems will develop. Information required under this proposal is already available on request at no cost to the access seeker through direct engagement with us.
Q23. Do you agree the Authority's proposed amendments comply with section 32 of the Electricity Industry Act?	The amendments as drafted do not clearly demonstrate that mandatory, detailed HV visibility requirements represent the most appropriate means of achieving the stated objectives, particularly for small EDBs. The Authority needs to more robustly demonstrate that the benefits outweigh the costs across all sized EDBs before this threshold is met.
Q24. Do you have any comments on the drafting of the proposed amendment?	The drafting of the amendments is premature given the assumption that information is readily available is incorrect. Access seekers have not provided concrete information that the details in this proposal are necessary. In addition, there is no evidence provided by the Authority that access seekers will have positive and



	actual benefits from all the detail prescribed in these amendments. The drafting as it stands proceeds on assumptions about EDB capability and data availability that have not been verified
Please indicate if you wish to be consulted during the development of the technical specifications supporting the proposed Code amendment.	Yes. If this proposal goes ahead, Westpower wishes to be directly consulted and involved in the development of any technical specifications. Small EDB perspectives must be represented to avoid specifications being designed around the capabilities of large urban networks which is almost always the case.