

Network connections project: Stage one amendments

Submission form

Introduction

The Electricity Authority Te Mana Hiko seeks views on the DG proposals in the 'Network connections project: Stage one amendments' consultation paper. To assist you, this submission form includes the questions in that paper in one place, in Microsoft Word and in tabular form.

You are not limited by the questions provided and are encouraged to provide other comments you think are relevant to the Authority's proposals.

Submission details

Submitting organisation	Counties Energy
Contact person	██████████
Contact email	██

Questions

Proposal A questions: Amend the application processes for larger-capacity DG applications
A) What are your thoughts on the proposal to replace nameplate capacity with maximum export power?
The proposal to replace nameplate capacity with maximum export power has its merits. Counties Energy agrees with processing applications based on export capacity, which can streamline the process and make it more efficient. However, they also believe that nameplate capacity should still be provided for record-keeping purposes. This approach ensures that while the application process is simplified, the historical data regarding nameplate capacity is maintained for future reference and record-keeping
B) Do you support the proposed Process 2 for medium DG (>10kW and <300kW), including the proposed requirements and timeframes? What are your thoughts on the proposed size threshold? What other changes would you make to the medium DG application process, if any?
Counties Energy supports the proposed size threshold. However, even at this size threshold, we believe network studies may be required in some cases. In such cases, 40 business days for the Distributor to make a decision will typically be insufficient, as network studies can have long lead times due to external resource dependency e.g. consultants. As such, we

<p>believe an interim phase should be adopted for medium DG as well. This phase can be bypassed if the application does not require network studies, and the initial application can be treated as the interim.</p> <p>We also support the industry in developing prioritisation guidance for a consistent approach.</p> <p>The proposed thresholds and timeframes for Process 2 are acceptable.</p>
<p>C) Do you support the proposed Process 3 for large DG applications ($\geq 300\text{kW}$), including the proposed requirements and timeframes? What are your thoughts on the proposed size thresholds? What other changes would you make to the large DG application process, if any?</p>
<p>While the proposed Process 3 for large DG applications ($\geq 300\text{kW}$) has its advantages, there is a lack of clarity regarding the ability to put a job on hold due to awaiting customer data or information, and how this affects the timeframes. This ambiguity needs to be addressed to ensure a smooth and efficient application process.</p>
<p>D) Do you think the Authority should apply any of the proposed changes for large DG to medium DG applications also?</p>
<p>As per response in B) above.</p>
<p>E) What are your thoughts on industry developing the detailed policies to complement the Code changes proposed in this paper?</p>
<p>Counties Energy has no feedback or comments on this matter and agrees with the proposal</p>
<p>F) What are your thoughts on the Authority's summary of capacity rights allocation?</p>
<p>Counties Energy has no feedback or comments on this matter and agrees with the proposal</p>
<p>Proposal B questions: Add application processes for larger-capacity load</p>
<p>G) For Process 3 for medium load ($>69\text{kVA}$ and $<300\text{kVA}$) applications:</p> <ul style="list-style-type: none"> • Do you support the proposed process and why? • What are your thoughts on the proposed requirements, size thresholds and timeframes? • What changes would you make to the medium-load application process, if any?
<p>We believe this may be for Process 4, if that is the case then we support the change.</p>
<p>H) For Process 5 for large load ($\geq 300\text{kVA}$) applications:</p> <ul style="list-style-type: none"> • Do you support the proposed process and why? • What are your thoughts on the proposed requirements, size thresholds and timeframes? • What changes would you make to the large load application process, if any?

Counties Energy has concerns about very large infrastructure projects, such as those for water or rail, which typically take longer than one year and may fall outside the proposed timeframes.

Is there a possibility for a dispensation for projects of 5MW or above, as these often involve substation design or modification? The proposed interim to final application period of 90 days may not be sufficient for these larger customers.

I) Do you think the Authority should apply any of the proposed changes for large load to medium-load applications also? If so, which ones and why?

Counties Energy has no feedback or comments on this matter and agrees with the proposal

J) What are your thoughts on the Authority's summary of capacity rights allocation?

Counties Energy has no feedback or comments on this matter and agrees with the proposal

K) What else does the Authority need to consider beyond the proposals in this paper and why?

Counties are concerned about the obligation to connect large-scale loads where we are expected to help fund the connection under the proposed pricing changes. Particularly if substation upgrades are required. Large load such as data centres and hydrogen plants that ideally would connect to Transpower can now insist on a distribution connection as this would be part funded, whereas if they connected to Transpower this would be fully customer funded. We suggest the obligation to connect should not be compulsory above 2MW.

Counties Energy does not consider that the remedy for a breach of the regulated timeframes should be that the distributor is deemed to have approved the application. This would be a disproportionate penalty. It also ignores that there could be reasonable grounds for not meeting the regulated timeframes and there may be reasonable technical and operational practicability, and network security and safety, issues that need to be addressed before the application can be approved.

Proposal C questions: Require distributors to publish a 'network connections pipeline' for large-capacity DG and load, and provide information on this pipeline to the Authority

L) Do you support the proposed network connections pipeline, why, why not? What changes would you make, if any? What are your thoughts on the scope of the information to be published?

Counties Energy believes that a threshold of 300kW is too low for managing a pipeline of these jobs. We suggest that a more relevant threshold would be 750kW and above. This is because it would eliminate subdivisions falling into this category.

M) What are your thoughts on the proposal for distributors to provide information directly to the Authority on an ongoing basis?

Counties Energy believes that this proposal may result in unnecessary administrative costs
Proposal D questions: Require distributors to provide more information on network capacity
N) What do you think of the proposal to publish more information on network capacity? What challenges do you see with providing the data? What changes would you make, if any?
<p>Counties Energy agrees with the proposal to publish more information on network capacity. Some of the key challenges will be:</p> <ul style="list-style-type: none"> • Information on available capacity at a zone substation or total feeder level is achievable at a time of use level, however such information at points along a feeder could be challenging due to individual load flows being required. • Information at the low voltage transformer level will require low voltage network usage visibility (via metering or other logging devices). This could be challenging to provide for all transformers. <p>The proposed code specifies a list to be provided. It's unclear if the requirement is for available capacity relative to peak demand or available capacity at a given point in time based on the demand at the time. If it's the latter, the list can become quite large, and may not be the best form to present this information. Clarification is requested.</p>
O) What are your thoughts on the scope and granularity of the information to be published?
<p>We believe that the high voltage level should be the primary requirement, and information on the low voltage transformer level is gradually provided as visibility on low voltage networks improves.</p> <p>We also believe that the available capacity figure needs to consider any existing capacity rights, and therefore the published list will only be a snapshot in time (particularly for low voltage transformers in high growth areas), and that access seekers should take the information as indicative only.</p>
Proposal E questions: Update the regulated terms for DG
P) What are your thoughts on the proposed changes to the regulated terms?
Counties Energy supports this proposal. We need some restrictions such as having a limit on the MW that we would connect at any one location. For example a 80MW windfarm wanted to connect to a 40MW substation.
Proposal F questions: Add regulated and prescribed terms for load applications and amend dispute resolution requirements

Q) What are your thoughts on the proposed regulated and prescribed terms for load? What changes would you make, if any?
Counties Energy has no feedback or comments on this matter and agrees with the proposal
R) What are your views on the proposed dispute resolution changes for Part 6? In what ways could dispute resolution be further improved? What are your thoughts on the alternative options to deliver dispute resolution discussed in this paper? Do you have any feedback on the 20-business day timeframe proposed?
Counties Energy has no feedback or comments on this matter and agrees with the proposal
S) Do you consider the alternative contractual terms option discussed in this paper (and in the Distribution connection pricing consultation paper) would be better than the proposal without contractual terms? What are your thoughts on the other alternative options referred to?
Counties Energy has no feedback or comments on this matter and agrees with the proposal
Proposal G questions: Increase record-keeping requirements for distributors
T) Do you support the proposal to increase the record-keeping requirements for distributors and why? What changes would you make, if any?
Counties Energy has no feedback or comments on this matter and agrees with the proposal
Proposal H questions: Introduce new Part 1 definitions and amend existing definitions (Part 1 only)
U) What are your thoughts on the proposed new definitions and amended definitions for Part 1 of the Code? What changes would you make, if any?
Counties Energy has no feedback or comments on this matter and agrees with the proposal
V) What other terms do you think the Authority should define and what definitions do you propose for those terms?
Counties Energy has no feedback or comments on this matter and agrees with the proposal
Proposal I question: Make minor and incidental amendments to Part 6
W) What are your thoughts on the proposed minor and incidental changes to Part 6? What minor and incidental changes has the Authority missed and what changes would you make, if any?
Counties Energy has no feedback or comments on this matter and agrees with the proposal

Transitional arrangement questions
X) What are your thoughts on the transitional arrangements for the proposals in this paper? Submitters can consider individual proposals when responding to this question.
Counties Energy has concerns regarding the external resources required to implement this change and their availability, which could potentially affect the noted timeframes.
Y) What proposals do you consider the most important? How long do you think is needed to implement these?
Managing and meeting timeframes would be a priority over capacity maps and we believe these may require a longer implementation process.
Code drafting question
Z) Do you have comment on the Authority's drafting of the proposed Code changes? What changes would you make, if any?
Counties Energy has no feedback or comments on this matter and agrees with the proposal