

24 January 2025

Electricity Authority

By email: connection.feedback@ea.govt.nz

Network Connections Project – Stage One: Cross-submission

Meridian appreciates the opportunity to provide a cross-submission on the Electricity Authority's (Authority) Network Connections Project – Stage One consultation.

Meridian reiterates its support for the Authority's efforts to improve the efficiency of connecting distributed generation and load to distribution networks across the industry. Our cross-submission points are set out below.

1. Lack of acknowledgment and insight into the problem

It is disappointing to note that some parties who are crucial to the successful implementation of the Authority's proposals, are of the view that there isn't evidence of an issue to be remedied by the proposed regulation, for example:

- ENA's view on pages 1 and 2 respectively of its submission – *"(s)tandard, high-volume connections ... are working well for access-seekers..."* and *"(w)e are not aware that there are significant problems experienced by access seekers such that they are not being offered a network connection. It is therefore difficult to see what problem this new obligation (to connect load) is intended to resolve."*; and
- Vector's statement in clause 6 of their submission – *"... the Authority has not robustly articulated the problem they are trying to solve, nor provided evidence that would justify prescriptive regulation or major changes ... The consultation paper provides no examples or case studies that would help submitters understand the problem better. It is concerning that, given the likely cost of implementing the Authority's proposals, more has not been done by the Authority to ensure the problem is well defined and the solutions being proposed will sufficiently address that problem."*

The barriers facing access seekers, including charge point operators (CPOs), have been well documented by Drive Electric through expert analysis and industry consultation (including with ENA and the network distribution companies). The challenges faced by parties wishing to connect to electricity networks, and recommendations for improvements, has been shared with ENA and many EDBs and can be found here: <https://driveelectric.org.nz/charge-point-operators/>.

We, and the rest of the industry, have not been able to make any significant headway towards achieving the Government's goal of 10,000 public EV chargers by 2030 partly because, in our role as a CPO, we face inefficient and varied processes and pricing. We do not have easy visibility of EDBs network capacity, and

(for some) their pricing methodologies and cost calculators. In some cases we have been presented with what we would consider to be exorbitant costs in order to connect to relevant networks.

These inefficiencies and costs result in the public charging infrastructure that EV drivers will rely on often not being delivered and will likely lead to slower transport electrification and decarbonisation.

2. Reliance on voluntary industry action to address barriers to network connections is insufficient

Reliance on key industry stakeholders who do not acknowledge or have insight into the current issues to connect load to the distribution networks as mentioned above, but who are essential for the successful implementation of the Authority's proposals, is unlikely to provide the necessary change called for by the industry.

This reinforces our original submission that leaving the development and implementation of particular process and pricing improvements to voluntary industry action will not result in the transformation needed to deliver an efficient network connection system.

A more prescriptive approach is needed to drive change across all 29 distribution companies.

Concluding remarks

This submission is not confidential and can be released in full. I can be contacted to discuss any of the points made.

Nāku noa, nā

Senior Legal Counsel