

Cross-submission by

**Z Energy & Flick**



**FLICK**

to the

**Electricity Authority**

on the

**Network connections project: stage one amendments  
consultation paper**

24 January 2025

## Introduction

Z Energy (Z) and Flick appreciate the opportunity to provide a cross-submission after reviewing the significant volume of feedback on the Electricity Authority's (Authority) proposals.

As with our initial submission, dated 20 December 2024, our commentary focuses on the proposed regulated process for connection of load, and in particular public EV chargers.

We look forward to continuing to work constructively with the Authority and welcome the opportunity to hold a briefing session to discuss our submission in more detail.

If there is any information that would be of use to the Authority, please do not hesitate to contact us.

Commentary from Z and Flick	
1.	<b>Thresholds</b>
	We acknowledge several submitters have recommended an increase in the threshold for 'medium' load. We agree that a threshold that cuts across existing regulated standards for EV chargers is unhelpful. <sup>1</sup> Z and Flick <b>support</b> an upper limit for 'medium' load at 1MVA.
2.	<b>Connection application process</b>
	<p>We note that submissions by several Electricity Distribution Businesses (EDBs) noted that detailed Codified process for 'medium' load may in fact slow down the amount of time it currently takes them to approve these connections. This is because the proposed Code stipulates the provision of certain information, including specific timeframes for steps in the process. Further to this, a significant volume of current applications do not require this level of analysis.</p> <p>Z and Flick <b>support</b> Drive Electric's recommendation for a fast-track process for homogeneous application types. This approach is more aligned with the complexity of the connection – as opposed to the capacity of the connection. Vector disclosed it has established a process for 'simple' connections and 'complex' connections.</p> <p>Z and Flick <b>support</b> an approach to processing applications that has a focus on complexity (rather than capacity). This would mean simple connections with minimal complexity can be quickly and efficiently processed, leaving EDBs to focus their resources on complex connection applications.</p>
3.	<b>Prioritisation of applications</b>
	We note that numerous EDBs agree with Z's position <sup>2</sup> that EDBs should not be asked to prioritise applications based on each EDB's interpretation of the "long-term benefit of consumers". We agree with EDBs that may open them up to legal disputes and, as the ENA submitted, EDBs are not capable, nor is it appropriate, that they should carry out such assessments. <sup>3</sup>
4.	<b>Default Connection Agreement and Dispute resolution service</b>
	<p>Submitters across load and EDBs have raised concerns about the Authority's proposal to replicate the default agreement and dispute resolution Code for generation to apply to load.</p> <p>Z and Flick <b>agree</b> with these submitters that this requires reconsideration.</p>
5.	<b>Confidentiality of connection application information</b>

<sup>1</sup> NZ Transport Agency (NZTA) recommends CCS2 as the connector standard for new vehicles in NZ. The CCS2 connector specifications are standardised by the International Electrotechnical Commission (IEC) for EVSE and are a maximum of 1,000V DC and a maximum of 500A, giving a maximum of 500kVA.

<sup>2</sup> Please refer to our general comments on proposal A11 under heading 'Appendix 4' on page 4 of our [submission](#).

<sup>3</sup> Page 4 of ENA [submission](#).

	<p>Z and Flick <b>supports</b> submitters<sup>4</sup> concerns about the proposed treatment of confidential information.</p> <p>We reiterate our concerns:<sup>5</sup> firstly, that the EDB appears responsible for deciding what is confidential information about a connection request from a load or generation customer and what can be shared with the Authority; and secondly, that the Authority has the ultimate right to decide what information to make public and can override the EDB's decision.</p> <p>We <b>recommend</b> c.6.3B be amended to require the EDB to consult with its connection applicants to establish the information that should remain confidential.</p>
6.	<b>Information about network capacity</b>
	<p>Z and Flick note there is a lot of feedback about the Authority's proposals regarding network capacity information. Unison describe accessing smart meter data as an urgent priority (currently not available on commercially reasonable terms due to the market power that rests with MEPS).<sup>6</sup></p> <p>Z and Flick have long supported proposals for EDBs to easily access smart meter data to enable visibility of activity on low voltage lines (thus minimising any need to invest to recreate data that should already be available).<sup>7</sup></p> <p>We <b>support</b> calls for the Authority to prioritise enabling EDBs access to meter data – this is a separate workstream that has wider benefits and should be progressed regardless of the timing and content of any changes to Part 6.</p>
7.	<b>Further consultation round</b>
	<p>There are disparate views and lots of suggestions to improve the Authority's proposals for regulating connection of load customers.</p> <p>Z and Flick <b>recommend</b> the Authority should consult again when it has narrowed down the changes it proposes – to inform final decisions on both policy and technical Code changes.</p>

ENDS

<sup>4</sup> Including from AirNZ, MEUG, ChargeNet, Genesis Energy, Aurora Energy, Orion.

<sup>5</sup> Please refer to our answer to question L page 8 of our [submission](#).

<sup>6</sup> Page 6.

<sup>7</sup> Amongst submissions on this topic: Business Energy Council support enabling access for distributors to smart meter data (paragraph 4); PowerNet note that without universal access to smart meter data EDBs will approach getting this data in different ways – increasing inconsistency (answer to question N page 10); Waipa Networks suggest adopting AEMC's approach where EDBs have access to power quality data from small customers' meters for safety reasons (answer to question N page 8).