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Electricity Authority
P O Box 10-041
Wellington

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

Dear team,

Re: Distributed pipeline consultation

The Electricity Authority has issued the consultation paper 'Improving visibility of significant distributed generation and load projects: clause 2.16 information notice' and Buller Electricity Limited (BEL) appreciates the opportunity to make a submission.

BEL is a consumer owned electricity distributor delivering 51GWh of electricity to our 4,900 customers in the northern part of the West Coast of the South Island - from Meyville Bay in the south (5km north of Punakaiki), to Karamea in the north. Much of this area is rural incorporating significant dairy and beef farming, with Westport township being the main population base. As a consumer owned business, we are focused on delivering reliable and affordable electricity for our customer shareholders. We are motivated to ensure that policy and Code changes have a positive net economic benefit.

The Electricity Authority (Authority) is proposing to collect a substantial amount of data from distributors as they process applications for connection by generation with net export $\geq 300\text{kW}$ and by load $\geq 500\text{kVA}$.

BEL agrees there is benefit in having transparency about the connection application pipeline:

- current and prospective applicants benefit from understanding the size of the queue and where they are in the queue
- the Authority should be able to publish robust information about the likely and potential new supply and demand on the power system

However, distributors' application processing systems may need to be modified / updated to collect the information required by the c2.16 Notice for the proposed monthly returns. This is especially when a distributor's processing system has been created to ensure at least the information listed in Part 6 is provided with an initial application. Clause 2 of Appendix 3 Part 6 lists the information that an applicant is to provide in its initial application - which includes "*a brief description of the physical location at the address at which the distributed generation is or will be connected*" BUT the c2.16 Notice asks for the longitude and latitude of the location.

If this proposal goes ahead BEL will be looking to ensure the c2.16 Notice monthly return can be extracted directly from our application processing system to avoid any double handling.

BEL receives few applications to connect new load $\geq 500\text{kVA}$ or generation with a net export $\geq 300\text{kW}$. BEL submits the Authority's process must ensure there is minimal compliance effort for distributors if there have been no changes to existing applications and/or no new applications during a month.

Information being requested

The Authority has a Generation and Load Pipeline dataset on its website based on information that is being provided by Transpower on transmission grid connected projects. The consultation paper says *"The information sought by the proposed c2.16 notice will complement our existing grid-connected investment pipeline and improve the visibility of generation investment at the distribution level, increasing overall confidence in the investment pipeline and contributing to a holistic view of future electricity supply and demand."*

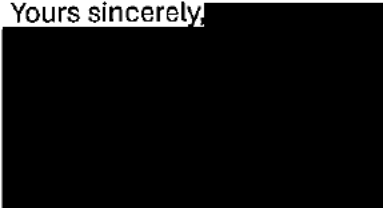
A comparison of the c2.16 Notice for Transpower with the proposed c2.16 Notice for distributors reveals differences in the information being collected, for example:

- the list of generation types is different - the grid connected generation types includes waste-to-energy but this isn't on the distributor list
- the fuel type has been updated in the distributor notice to include hydrogen
- distributors are being asked if an inverter is grid forming or grid following

Obviously, these notices are being issued at a different time and views about what is important can change but to maximise the value of this effort – by distributors and Transpower - the information being collected should be the same so that the merged datasets are directly comparable.¹ If the new information being collected by distributors is important BEL submits the c2.16 Notice to Transpower should be updated to be identical.²

We would welcome the opportunity to discuss our submission with you.

Yours sincerely,



Group Commercial Manager

¹ There are some process steps where the information requested will be different

² It is unclear why the information requested in the distributor c2.16 Notice is in a different order from the Transpower c2.16 Notice if this creates inefficiencies in the process of merging the two datasets