

Appendix B Format for Feedback

Improving visibility of significant distributed generation and load projects – clause 2.16 information notice

Submitter	Counties Energy
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Question	Comments
Q1. Do you agree with the Authority's proposal to require monthly provision of information to the Authority, to enable a 'rolling' set of information?	Agree
Q2. Do you agree with the proposed kW/kVA thresholds for inclusion of projects under the proposed notice?	Agree, and support alignment with the upcoming changes to EIPC Part 6.
Q3. Do you think smaller projects should be included under the proposed notice?	No
Q4. Do you have any comments on the proposal to require developers (via distributors) to provide increased information on their generation and load projects?	<p>We support the intent to improve visibility of upcoming projects. However, we are concerned about how private, confidential and commercially sensitive information will be managed, and the EDBs legal obligations to the customer for it.</p> <p>A point to consider is, if the information was gathered with the intent of being published, it could expose critical IP, especially where a party is looking at making an investment opportunity and other competitors could easily benefit from that visibility. i.e. a particular area is being considered for a solar farm by company X. Other solar farm competitors get to learn where solar farm opportunities are/being considered.</p>
Q5. Do you have any comments on the proposal to require distributors to provide information that might be classified as confidential?	Clear governance will be required to manage what is shared, ensuring confidential information is protected and risks to customers and projects are mitigated. Ideally the EDB would seek permissions from the customer for sharing confidential information and opt out where the customer refuses to share the information onwards.

<p>Q6. Do you agree with the Authority's proposal to publish aggregated information, and do you have any comments on how to best maintain confidentiality while providing as much transparency as possible?</p>	<p>We support the publication of aggregated information where required.</p> <p>However, we will need to ensure that aggregated data is managed in a way that prevents the identification of individual projects or commercially sensitive details. This will be important in areas of the network where there are only a one/small number of projects.</p> <p>Begin by collecting high-level data (e.g. project stage, capacity) only, then in time include more detail after assessing risks over time.</p> <p>Additionally, strong data handling and processes will need to be in place to protect confidentiality and for this to be regularly reviewed.</p>
<p>Q7. Do you agree with the Authority's proposal to aggregate some information provided by distributors to assess the status or stage of projects, and do you have any comments on the breakdown of the proposed stages?</p>	<p>We support the proposal to aggregate project information by stage.</p> <p>However, we believe the Authority should define minimum requirements for what is included on the dashboard to ensure consistency. While the EA may collect more detailed information for internal use, not all of it should be published, especially if it includes commercially sensitive data.</p>
<p>Q8. Do you have any comments on when the data collection should commence?</p>	<p>We recommend aligning the implementation with the upcoming regulatory changes in November 2026, such as the pipeline and queue management. This will reduce the pressure of rolling out new capabilities on EDBs.</p>
<p>Q9. Do you think data collection for DG and load should commence at the same time?</p>	<p>Yes, agree</p>
<p>Q10. Do you agree the benefits of the proposed clause 2.16 notice outweigh its costs? If not, what area(s) of the Authority's preliminary assessment of benefits and costs do you disagree with?</p>	<p>We have a neutral position however a CBA should ideally be considered.</p>

Q11. Do you agree the proposed clause 2.16 notice 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 Act.	No comment
Q12. Should the Authority consider further work to monitor and assess the pipeline of new generation and demand?	No comment
Q13. Do you have any comments on the drafting of the proposed notice?	No comment