

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Monday, 3 November 2025 4:56 pm  
**To:** Distribution Feedback  
**Cc:** [REDACTED]  
**Subject:** Distributed pipeline consultation

Good afternoon,

Thanks you for the opportunity to provide comment's on the Electricity Authority's consultation paper *Improving visibility of significant distributed generation and load projects: clause 2.16 information notice*.

We have the following comments on the consultation paper:

- We are comfortable with the Authority introducing an information gathering notice to gather information on distributed generation and large load projects to be built on distribution networks. We believe this information is complementary to that gathered for the transmission network, and provides a more robust picture of both supply and demand across the country. This information is of value to multiple parties, and can help regulators and energy companies identify both opportunities and emerging risks / constraints.
  - It may also be useful during Commerce Commission resets for regulated EDBs, as another source for verifying forecast demand.
- We believe that aligning this information request with the other requirements under the network connections project should help reduce the magnitude of administrative costs placed on EDBs, noting that the workload will vary based on the scale of demand faced in each EDB.
- We agree that demand is less predictable than DG (paragraph 4.17), given the current economic climate.
- We are comfortable with the proposed threshold for large load (>500 kVA), but note that this may capture a very large number of projects on big networks such as Vector and Orion. We recommend the Authority discuss this with a sample of EDBs, to understand its workability in practice, or look to refine it over time if it eventuates that the threshold is set too low.
- We support updates of the distribution projects on the same frequency as the generation investment pipeline.
- Information on some load projects may be commercially-sensitive and therefore must be treated carefully, inline with best practice information and privacy policies. With smaller networks, it may also not be possible to aggregate the data, if there are a limited number of projects. We encourage distributors to ensure that highly commercial data is well highlighted to the Authority when provided.
- We support this information being shared with the system operator, noting confidentiality of some information.

Please feel free to contact me directly to discuss any comments further,

Kind regards,



**Major Electricity  
Users' Group**

[REDACTED]  
Executive Director  
Major Electricity Users' Group

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