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Electricity Authority | Te Mana Hiko



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

Tēnā koutou

IMPROVING VISIBILITY OF SIGNIFICANT DISTRIBUTED GENERATION AND LOAD PROJECTS: CLAUSE 2.16 INFORMATION NOTICE CONSULTATION PAPER

Unison Networks Limited (**Unison**) is an electricity distribution business operating in Hawke's Bay, Taupō, and Rotorua. Centralines Limited (**Centralines**) operates in Central Hawke's Bay. As consumer-owned electricity distribution companies, we operate in trust for the enduring benefit of our communities. Strategic planning focuses on delivering sustainable, reliable, and efficient network services, while maintaining a balance between affordability and responsible investment. These initiatives prioritise consumer interests, ensure compliance with regulatory requirements, and support New Zealand's transition to new energy solutions.

Introduction

1. Unison and Centralines appreciate the opportunity to comment on the Electricity Authority's proposal to issue a clause 2.16 information notice to improve visibility of significant distributed generation and load projects.
2. As consumer-owned electricity distribution businesses, our focus is on delivering safe, reliable, and affordable electricity to our communities. We support the Authority's intent to enhance sector transparency and improve information on investment pipelines, but we have several concerns regarding duplication, timing, data consistency, and practical implementation.

Duplication of Effort and Efficiency Concerns

3. We are concerned that requiring information from distributors for a national database of significant connections will duplicate the existing requirement for EDBs to publish similar connection pipelines individually under the *Network Connections Project (Stage One)* decision.
4. Setting up and maintaining both a national and network-specific dataset would impose unnecessary administrative and cost burdens on distributors, outweighing the marginal benefits.

5. We recommend that only one approach be mandated, either the national pipeline managed by the Authority or the network-specific pipelines published by EDBs, to avoid unnecessary duplication of work and costs.

Implementation Timing and Phasing

6. We recommend aligning the effective date and reporting frequency of the proposed clause 2.16 information notice with the *Network Connections Project (Stage One)* implementation timeline.
7. Doing so will ensure consistency, enable EDBs to develop systems and processes efficiently, and avoid premature investment in systems that may later require modification. The same data collected for EDBs' published connection pipelines could be used to form the Authority's national view, minimising cost and duplication.

Data Consistency and Confidentiality Treatment

8. Consistency is needed in how confidential information from developers is defined, handled, and protected across both the proposed clause 2.16 requirements and the EDBs' own publication obligations.
9. We seek clarity on:
 - a. Whether confidentiality requirements will be identical between the two frameworks.
 - b. How EDBs should respond when confidentiality agreements with developers prevent sharing information with the Authority.
10. Clear and consistent guidance is essential to prevent compliance risk and maintain trust with developers.

Lack of Definition for “Developer”

11. The proposal refers extensively to “developers” as the source of information EDBs are expected to collect and pass on to the Authority, yet the term developer is not defined in either the consultation paper or the Electricity Industry Participation Code. This creates ambiguity about the scope of entities from whom distributors must seek information.
12. The absence of a clear definition makes it difficult for EDBs to determine their obligations and may complicate engagement with connecting parties. We therefore recommend that the Authority clarify the term “developer”.

Practical Implementation

13. The proposal significantly expands the type of project information EDBs must collect, such as project stage, consents, land status, construction progress, contracts, and financing. Much of this information may not be readily available to EDBs or within developers' control at early stages.
14. If EDBs are to be responsible for gathering this information, they must be furnished with the tools to require it from developers. The Authority should also ensure that the required information is limited to data that developers can reasonably provide without breaching confidentiality or commercial sensitivities.

Conclusion

15. Unison and Centralines support the Authority's objectives of improving visibility and coordination of significant distributed generation and load projects. However, the proposal should be refined to:
 - a. Eliminate duplication between national and network-specific pipelines
 - b. Align timing and data frequency with the Network Connections Project
 - c. Ensure consistent and practical confidentiality treatment
 - d. Clarify the term "developer"
 - e. Provide EDBs with adequate tools and realistic data requirements
16. We welcome further engagement with the Authority to design an efficient and proportionate approach that achieves transparency while minimising unnecessary regulatory burden.

Nā māua noa, nā

REGULATORY MANAGER / PRINCIPAL REGULATORY ADVISOR