



Submission on improving
visibility of significant
distributed generation and
load projects: clause 2.16
information notice

3 November 2025

1 Submission and contact details

Consultation	Improving visibility of significant distributed generation and load projects: clause 2.16 information notice
Submitted to	Electricity Authority
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2 Confidential information

There is no confidential information provided in this submission. This submission can be publicly disclosed.

3 Executive Summary

Wellington Electricity Lines Limited (WELL) do not support providing the Electricity Authority (EA) with the information request as it is currently laid out in this consultation. It is more efficient for the same data used for EDBs pipeline work published on our website, to be used by the EA. EDBs are progressing the development of new requirements for network connections (as part of the Code drafting), and there is still work to be done before the queue management policy and process foundations are complete. WELL believe it is necessary that these are in place to feed the information request. WELL also believes that the cadence to provide information needs to be realistic for the capability of EDBs to ramp up these functions. This would require an opex allowance increase from the Commission and require a change in Price Path (currently a three year process). It would be better to slowly gather the information and analyse its value before increasing the burden on EDBs for those able to accommodate this additional work under a DPP.

The developer-specific information may prove difficult to obtain and EDBs may receive questions for its necessity. WELL appreciate that the EA have acknowledged confidentiality concerns, as this needs

to be taken very seriously to maintain confidence in the EDB/developer relationship. When the usefulness of the information is verified and processes are established, then it would make sense to start gathering more information.

WELL are supporting visibility of our LV network under four scenarios; Population growth, EV uptake, solar penetration, and gas transition. These areas take precedence for our resources and have the highest impact on our customers rather than DG and load pipeline work. This modelling will become publicly visible, however we are not currently funded to bring this to fruition until we have received the funding from a change in Price Path.

Alternatively, the EA could make changes to the market rules that would enable the management of the uncontrolled nature of the above changes, for example EV connection times or gas replacement water heating assets, such that they would operate outside congestion periods. This would assist in integrating new demand within the existing network capacity.

DG penetration is not likely to be a diversified injection into the network. A requirement for this energy to be matched with network storage devices should be considered so that solar injection can be limited. This would allow all consumers on the distribution network to benefit from excess DG injection through solar firming. In our view these types of changes would do far more to enable efficient management of network resources rather than simply adding to information required to be published, and thereby increasing costs.

4 Consultation Questions

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?

We believe that monthly provision of information is overly frequent given the pace of change in many projects, however, the Network Connections Code drafting technical change requires EDBs to publish pipeline project updates on a monthly basis, and therefore we agree that the clause 2.16 information requirements should have the same frequency. This is so that there is no discrepancy between sources of data that EDBs publish on their websites and data that EDBs provide the EA.

Ideally, a quarterly cadence is more practical and more likely to provide timely insights that align with the network congestion publication requirements too.

Q2. Do you agree with the proposed kW/kVA thresholds for inclusion of projects under the proposed notice?

The proposed kW/kVA thresholds are practical because they match the network connections Code drafting technical changes planned for October 2026. The ≥ 500 kVA threshold aligns with existing internal demarcations for “large load” and should preclude most residential subdivision and real estate development.

WELL would like to highlight that there are times when projects will not have an exact capacity rating until sufficient analysis by EDB engineers, which may happen after joining the pipeline. There are also instances where the assumed capacity threshold is met, but as more information is developed, the capacity is reduced and will not fall under the information request. It is not clear under the proposed notice whether or not all fields must be complete for the csv to be submitted.

There may be some projects that are lodged and then left for 18 months before there is any useful information to publish in the public domain. We suggest that only projects that are confirmed to meet the thresholds should be published in these requests.

Q3. Do you think smaller projects should be included under the proposed notice?

No, we agree that aligning with the network connection changes is most useful for data acquisition and project visibility. Including smaller projects would increase administrative burden on EDBs, without providing an equivalent benefit for the information.

Q4. Do you have any comments on the proposal to require developers (via distributors) to provide increased information on their generation and load projects?

This raises practical concerns because there is a lack of visibility into developer-side activities such as resource consent appeals or financing. Distributors are also not able to compel developers to provide some of the requested information on their generation and load projects that are not necessary for network connection. Distributors can request such information that the EA require, but cannot guarantee that it will be provided, and it is not clear if distributors will be penalised for not obtaining the data, or what would occur if there are incomplete data sets.

Projects should meet certain criteria (such as threshold limits confirmed), before requiring distributors to gather increased information on generation and load projects in the ‘project stage’. This would establish a certain level of confidence in the data. Obtaining these fields before developer commitment and network feasibility studies will put unrealistic expectations on EDBs.

None of the fields under 'project stage' appear to be used in the aggregated information list that is part of the consultation 5.34 (a-j), so it is not clear how the EA plan to use this information. We note that these fields are likely to hold confidential information, and without an explanation or use of the data, we question if it is necessary to gather.

Q5. Do you have any comments on the proposal to require distributors to provide information that might be classified as confidential?

As part of the objectives of the consultation, the EA wants to provide transparency and visibility of network DG and load projects. Confidential information cannot be made public so it is not clear why the EA need this information. If the EA can provide valid reasons for needing confidential data, then we recommend a clear framework for flagging and verifying why confidential data may need to be made public. The EA should confirm if any flagged data needs to be published and how the other data will be handled securely. Any confidential data that is deemed necessary to publish, should have a clear communication channel between the EDB and developer. This is essential to maintain trust with developers and commercial partners.

There are different levels of confidentiality that developers may seek. For example, some developers require NDAs in place, while others will seek confidentiality on other terms less formal. Distributors are the party signing the NDA, if the Authority then renders the information as desirable to make publicly available, this threatens the relationship between the distributor and the developers. This will hinder developers from proposing projects, rather than encourage investment. The information required will incur additional costs and make the whole process more expensive.

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?

We agree with the publication of aggregated information to anonymise any information that might be confidential. We also believe that any projects that have been flagged as confidential should have reduced requirements on EDBs to provide the increased project information other than the monthly information published on the EDBs website. This would give developers confidence that their information was secure.

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?

WELL agrees with the ENA's submission, which says it is practical to align the stages of projects with the development of the queue management policy. This will provide consistency across all data submitted to the EA and publication on EDBs websites. It provides greater transparency for the users of the data and understanding of the processes.

Q8. Do you have any comments on when the data collection should commence?

Data collection should be staged over a number of years, with the first (small) subset of the current information request, lining up with the publication requirements under the network connections Code changes in October 2026. This will allow EDBs to sync their processes for the information request and publish the same pipeline information on to the EDBs website. We also agree that a staged approach will help establish EDBs network connection pipeline processes and allow initial data acquisition challenges to be solved. This will also allow additional funding for a change in Price Path with the Commerce Commission for opex to be provided for.

Q9. Do you think data collection for DG and load should commence at the same time?

Yes, simultaneous data collection for DG and load would be appropriate. If there were separate data collection for DG and load, then any projects that have both DG and load would need to be split up and may cause initial confusion in the interpretation of the data.

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?

We agree that there are some benefits for the EA to publish consolidated pipeline data, and the set up costs for SFTP and csv files of data are relatively inexpensive. However, the collection of developer-specific and confidential information could prove expensive and discourage investment. For the acquisition of this data (and the deterrent of developer to investment), the costs would outweigh the benefits. WELL would look to recover the additional costs through a change in Price Path as the increase in opex cannot be obtained through the current DPP. This will delay the implementation until this process is complete, and requires additional resourcing and opex support.

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.

Yes, we agree that the notice is preferable. Especially because the data aligns with the pipeline provisions under the network connections Code changes. However, funding will be an important prerequisite as outlined above.

Q12. Should the Authority consider further work to monitor and assess the pipeline of new generation and demand?

Until the benefits of the proposed information sharing are proved to be beneficial, we do not see value in the EA doing more than they currently are doing, to monitor and assess the pipeline of new generation and demand. As outlined above, WELL will need to include the additional opex into our evaluation of a change in Price Path for consumer to decide whether these additional costs are of benefit to them. Some analysis of the Transpower version of the notice, and its realised benefits would provide some insights into how useful this could apply to EDBs.

Q13. Do you have any comments on the drafting of the proposed notice?

No.