



Electricity Authority

Wellington

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

3 November 2025

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

Transpower welcomes the opportunity to submit to the Authority's proposed clause 2.16 notice (published 3 October 2025) to improve visibility of significant distributed generation and load projects, on the distribution networks.

Transpower already reports under a clause 2.16 notice¹ for connections projects, including some distribution network-connected projects that create impacts to the grid owner's assets at GXPs or GIPs. We report on *aggregate* DER behind a GXP/GIP when that aggregation creates an impact.

With the new proposal requiring distributors to report significant distributed generation and load projects connected to their networks, there is a possibility that certain projects may be reported by both the grid owner and the distributor, resulting in potential duplication. In our view, creating two avenues for information could cause confusion and complication as a single DER development may be reported by the EDB but reporting by Transpower depends on whether that DER would create an impact on Transpower assets. Therefore, we consider Transpower should remove **all** embedded project data from the dataset we provide to the Authority to ensure a bright line between the two sets of information and consequently, clarity.

For the above reason we suggest the clause 2.16 notice for Transpower should be amended to include a clarifying statement for example *Transpower is not expected to report on projects on the Distributors networks, under this notice.*

For transparency and planning purposes we consider the Authority could make public the aggregate of all information collected from us and the EDB, at GXPs.

Yours sincerely

Head of Strategy and Regulation

¹ Transpower [Improving visibility of generation investment—Appendix A](#)