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

Transpower, in its role as System Operator, welcomes the opportunity to submit to the Authority's proposed clause 2.16 notice (published 3 October 20025) to improve visibility of significant distributed generation and load projects, on the distribution networks.

As System Operator we endorse the Authority's proposal to seek permission via the proposed notice to enable sharing the information received by the Authority with the System Operator (para. 5.42). Providing the System Operator with this information will assist with security of supply functions and modelling of the power system undertaken to maintain the System Operator's principal performance obligations. However, we note the draft clause 2.16 notice does not appear to contain any provisions seeking permission to share the information with the System Operator.

We agree with the Authority's characterisation of the existing barriers precluding sharing information received under a clause 2.16 notice with the System Operator, in the absence of permission being sought within the notice itself. An enduring solution would be for the Authority to amend the Code to enable the Authority to be able to share information gathered under clause 2.16 with the System Operator, if doing so would assist delivery of the Authority's statutory objectives.

We note the obligations contained in clause 8.21(2) and Sch. 8.3 Technical Code A 2(2) & (2A) to provide information to the System Operator would be unchanged by this proposal.

We agree with the EA's approach to publish aggregate information. However, care should be taken in deciding the level at which the information is aggregated. Distribution network limits and interregional transmission limits could impact the value of the information made public and is a key reason for ensuring the System Operator receives the disaggregated information confidentially.

Yours sincerely

**Head of Market Services**