



30 October 2025

Electricity Authority
PO Box 10041
Wellington 6143

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

**Consultation Paper – Improving visibility of significant distributed generation and load projects:
clause 2.16 information notice**

The WEL Networks appreciates the opportunity to provide feedback on the above consultation.

WEL Networks (WEL) is New Zealand's sixth largest electricity distribution company and is 100% owned by our community through our sole shareholder WEL Energy Trust. Our guiding statement of strategic intent is to be leading Waikato's energy future, and we work to ensure that our customers have access to reliable, affordable, and environmentally sustainable energy.

Whilst we understand the Electricity Authority's desire to procure greater visibility of the distribution connection pipelines, we have concerns that some of the information being requested will not be held by distribution companies resulting in need to re-engage with existing applicants. As an ongoing process all the information is unlikely to be held by applicants at the time of application, resulting in additional touch points and complexity to the connection process.

Our responses to the specific questions sought by the Authority are attached and should you require clarification on any part of this submission, please do not hesitate to contact me.

Yours sincerely

[Redacted signature]

[Redacted name]

Regulatory Specialist

[Redacted contact information]



Question	Comments
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?	WEL believes a quarterly update is more appropriate given the rate projects progress and new projects appear.
Q2. Do you agree with the proposed kW/kVA thresholds for inclusion of projects under the proposed notice?	We suggest a threshold of 1 MW/MVA to be consistent with Part 8 ACS requirements.
Q3. Do you think smaller projects should be included under the proposed notice?	No, as any benefit of having more information on smaller projects will be less than the cost to distributors and developers of collecting 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?	The information being requested may not yet be known as the developers may not yet have progressed their project sufficiently.
Q5. Do you have any comments on the proposal to require distributors to provide information that might be classified as confidential?	Developers and distributors may enter into non-disclosure agreements (NDAs) in respect of sensitive matters of projects. Developers may require similar NDAs with the Electricity Authority if information is to be disclosed, so a process to manage NDAs will likely be needed.
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?	It is not obvious that publishing some of the aggregated information will improve investment certainty but maybe otherwise beneficial. e.g. knowing that a given amount of load or generation will connect at 110 kV across New Zealand over a period of time is of limited value to developers but may be of value to equipment suppliers. Also, consideration will need to be given to how any confidential information gathered is handled.
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	Care will need to be taken to ensure that any information released cannot be reverse engineered for some unique developments due to their size and location.



comments on the breakdown of the proposed stages?	
<p>Q8. Do you have any comments on when the data collection should commence?</p>	<p>The consultation paper suggests the pipeline information will be required in early 2026 following the EA's decision in late 2025. This requirement is unrealistic given the short time between now and early 2026 noting reduced staff availability during the holiday season. The information provision process will need considerable automation which requires development of systems. In addition, distributors will need to confirm details with existing developers prior to providing pipeline.</p> <p>We suggest pipeline information provision should start in the second half of 2026</p>
<p>Q9. Do you think data collection for DG and load should commence at the same time?</p>	<p>Yes</p>
<p>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?</p>	<p>It is not apparent that the benefit of improving investment certainty by including distribution pipeline information exceeds the costs of providing such information as the cost-benefit analysis is insufficient.</p> <p>In terms of investment, the transmission pipeline provides the far greater value in terms of visibility. The value of the distribution pipeline information is an order of magnitude less. For a power system with a peak demand around 7-8 GW, understanding the likelihood of projects in the range 500-1000 MW proceeding (and where they are connecting) is far more important than understanding the likelihood of 1000 projects sized 300 kVA spread across the country.</p> <p>There will be costs for getting and processing the additional information from existing projects.</p>
<p>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.</p>	<p>It seems that the equivalent costs (or more) of generation investment surveys are simply being passed to distributors.</p> <p>There is an argument that ongoing obligations on participants should be incorporated in the Electricity Industry Participation Code to restrict 'scope creep' of a 2.16 notice under section 2.24 (2).</p>
<p>Q12. Should the Authority consider further work to monitor and</p>	<p>At some point it may be more efficient to have distribution generation and load pipeline information supplied as</p>





assess the pipeline of new generation and demand?	aggregated data at a distribution level (e.g. GXP) rather than supplying every single connection project.
Q13. Do you have any comments on the drafting of the proposed notice?	The Operator field is only applicable for generation and storage that participates in the electricity market. Most distributed generation and load developments are not likely to participate in the electricity market.

