

Appendix C Format for submissions

Network connections project (stage one)

Submitter	
Submitter's organisation	Independent Electricity Generators Association

The Authority invites technical submissions on the exposure draft to give effect to its decisions on the Network connections project (stage one). We are not seeking further submissions on decisions or their supporting rationale.

Please deliver your technical submission to connection.feedback@ea.govt.nz by **5pm, 7 October 2025**

Question: Are there any parts of the Code drafting that, in your view, do not accurately reflect the decision?

If so, please identify the issue and set out any proposed amendment(s).

Clause	Comments
Part 1 Preliminary provisions	
Part 1 definitions	There is an existing definition of 'Connection and operation standards'. We suggest the Authority review this as well as c6.2C, c6.3(2)(ca) and c6.2C, c6.3(2)(d) to simplify this information and make the language and requirements consistent. More clarity in the wording relating to 'Congestion Management Policy' is recommended
Part 6 Connecting to distribution networks	
Table of contents	.
6.1 Contents of this Part	
6.2 Purpose	
6.2A Application of Part to distributors in respect of embedded networks	

6.2AB Application of Part to applicants who are not participants	
6.2AC Application of Part to developments, subdivisions, or points of connection or installations at the same location	
6.2C Connection and operation standards	
6.3 Distributors must publish make information publicly available that is not confidential	
6.4 Process for obtaining approval	<p>In c6.4(1) on obtaining approval to connect, clause (e) (copied below) is the only situation when the distributor and applicant can agree another process. This is a formatting error and the words in red should apply to all other 4 situations in 6.4(1) OR the words in red don't need to be added to (only) c.6.4(e) as c.6.4A lists all the circumstances where another process can be agreed – including a change to the capacity of an existing load connection</p> <p><i>“(e) change the capacity of an existing load connection, unless the distributor and the applicant agree another process in accordance with clause 6.4A.”</i></p>
6.4A Distributor and applicant may agree to simpler process for existing connection	
6.5 Connection contract	
6.6 Connection on regulated terms	
6.7 Extra terms	
6.8 Dispute resolution	
6.8A Complaints by applicants that are not participants	
6.11 Distributors must act at arm's length	

6.12 This Part does not affect rights and obligations under Code	
6.12A Time frames for actions defined in this Part	The IEGA queries why it is only the distributor that can activate the clock stop / start mechanism. The new wording could include the applicant being able to request the distributor to activate the stop / start mechanism OR a requirement for the distributor to consult with the applicant or agree with the applicant that activating the stop / start mechanism is appropriate at this stage in the process.
6.12B Distributors to act reasonably	
6.13 This Part does not apply to earlier connections	
Schedule 6.1 Process for obtaining approval	
1 Contents of this Schedule	
2 Applicant must apply	c.2(1)(e) says the process should apply for a change in the capacity of ANY existing load connection – shouldn't this be for any change in capacity that brings the existing connection above 69kVA?
3 How this Schedule applies to applications	
4 When application may be made under Process 1A	
5 Confidentiality of information provided	
6 Distributors must keep records	
7 Responsibility for costs under this Schedule	
Schedule 6.1 Appendices	
Appendix 1: Process 1: Applications for distributed generation with maximum export power of 10 kW or less in total	

Appendix 1A: Process 1A: Applications for distributed generation with maximum export power of 10 kW or less in total in specified circumstances	
Appendix 2: Process 2: Applications for distributed generation with maximum export power above 10 kW and below 300 kW in total	<p>Note that the basis of the revised Code is the Code that applied to any DG connection above 10kW – which could have been say 35MW.</p> <p>The IEGA recommends the Authority do a sanity check of all the requirements in Appendix 2 now that this process only applies to DG above 10kW and below 300kW. A DG connection below 300kW is very likely to be less complicated and the Code should reflect this and not create confusion for applicants or uncertainty about additional obligations (for example, where a policy decision has established that a DG less than 1MW does not have to be notified to the System Operator/Transpower).</p>
Appendix 3: Process 3: Applications for distributed generation with maximum export power of 300 kW or more in total	<p>The revised Code includes new/additional thresholds that apply for extension timeframes – DG less than 1.5MW and DG of 1.5MW or greater. It is presumed this reflects some view about ‘complexity’. It would be less confusing if the timeframes for deciding interim and final applications lined up – so the first group is 300kW and above to less than 1.5MW and the second group is 1.5MW or greater to less than 5MW.</p> <p>The IEGA’s view continues to be that a connection application process based on the complexity of the connection (rather than rigid capacity) would better serve distributors and the access seekers.</p>
Appendix 4: Process 4: Applications for load above 69 kVA and below 500 kVA in total	
Appendix 5: Process 5: Applications for load at 500 kVA or more in total	
Schedule 6.2 Regulated terms for distributed generation	
Schedule 6.2 Regulated terms for distributed generation	

General	
Other errors outside the Schedules and clauses listed above	

Appendix D Table of Code drafting changes

The table below:

- (a) lists the drafting changes the Authority has made to give effect to decisions in the decision paper that were not explicit.
- (b) lists three corrections to the decision paper made on 02/09/2025 to correct errors.¹
No changes were required to the Code drafting as a result of the corrections.

Pinpoint reference in decision paper	Code clause giving effect to the decision
Table 2 title – error correction (Amended 2/6/25 to reflect it includes changes to all DG processes)	No change required
Paragraph 6.47(b)	Schedule 6.1, clause 2(1)(d)
Footnote 26 – error correction (Deleted from decision paper 2/9/25)	No change required
Paragraph 6.47(b)	Schedule 6.1, Appendix 2, clause 2(2)(b)(iv)
Paragraph 6.47(b)	Schedule 6.1, Appendix 2, clause 2(2)(d)
Paragraph 6.47(b)	Schedule 6.1, Appendix 2, clause 2(2)(d)(iii)
Paragraph 6.47(b)	Schedule 6.1, Appendix 2, clause 2(2)(d)(iv)
Paragraph 7.37(e)	Schedule 6.1, Appendix 2, clause 6(3)
Paragraph 6.47(b)	Schedule 6.1, Appendix 3, clause 2(3)(iv)
Paragraph 6.47(b)	Schedule 6.1, Appendix 3, clause 2(3)(d)
Paragraph 6.47(b)	Schedule 6.1, Appendix 3, clause 2(3)(d)(iii)
Paragraph 6.47(b)	Schedule 6.1, Appendix 3, clause 2(3)(d)(iv)
Paragraphs 6.83 and 6.84	Schedule 6.1, Appendix 3, clause 6(7) Schedule 6.1, Appendix 3, clause 9(6)
Paragraph 7.37(f)	Schedule 6.1, Appendix 7, clause 9(2)
Paragraphs 7.37(g) and 11.35(a)	Schedule 6.1, Appendix 7, clause 14

¹ See <https://www.ea.govt.nz/projects/all/network-connections/consultation/network-connections-project-stage-one>.

Paragraph 7.37(f)	Schedule 6.1, Appendix 8, clause 14(2)
Paragraphs 11.35(a), 7.37(h) and 7.37(i)	Schedule 6.1, Appendix 8, clause 20(3)(b)
16.9(k) second paragraph – error correction (Amended 2/9/25 to “The Authority agrees...”)	No change required
Table 6: E4	We have retained clause 15A to clarify it only applies to Process 1 and 1A applications