

23 January 2024



Submissions  
Electricity Authority  
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Via email: [connection.feedback@ea.govt.nz](mailto:connection.feedback@ea.govt.nz)

### **Cross-Submission: Network Connection Project – Stage One Amendments**

Buller Electricity Limited (BEL) appreciates the opportunity to provide this cross-submission after reading submissions on the Electricity Authority's (Authority) proposed changes to Part 6 for connection of load and generation customers.

#### *Threshold for 'medium' versus large' connection process*

BEL reiterates its preference for a threshold that is related to technical aspects and complexity of the network connection. A categorisation of 'low', medium or 'high' complexity should be developed by distributors and stakeholders and applied by all EDBs. This approach is supported by other EDBs and load customers (eg Vector's current approach is to categorise applications as simple or complex).

#### *Measure for thresholds*

BEL notes there is not unanimous support for using maximum export power as the threshold for determining a connection process. If a complexity threshold was adopted the maximum export power and nameplate capacity are likely to both be relevant as an input into determining complexity.

#### *Prioritisation of connection applications*

BEL supports other EDBs and ENA who submitted that it is not appropriate for each EDB to apply its own interpretation of achieving "the most long-term benefit of consumers". EDBs clearly do not want this responsibility (which, as pointed out, could result in a higher level of disputes) and BEL's preference is for EDBs to rely on the purpose of Part 6 of the Code – to enable connection of generation and load if being connected is consistent with connection and operation standards.

#### *Industry development of a prioritisation, queuing and management policy*

BEL notes widespread support (including our own) for the industry and stakeholders to work on developing a prioritisation, queueing and management policy that would be implemented by all EDBs.

#### *Costs and benefits*

BEL agrees with other submitters who have highlighted the costs being imposed on EDBs by the proposed Code. BEL supports calls for more evidence-based policy making and requests the Authority thoroughly consider information presented in submission that demonstrate a more flexible lower cost approach to a number of different proposals is available.

### *Further consultation*

The Authority has received significant feedback on its proposals and should, in our view, be seriously reconsidering and reworking its proposals. This will likely result in approaches that are materially different from the proposals in the initial consultation, and therefore worthy of further review / feedback / consultation involving all stakeholders.

BEL looks forward to engaging with the Authority as it refines its policy decisions and prepares a clear and easy to understand Code.

**Buller Electricity Limited**