

Submission on consultation paper

Improving information on high-voltage network capacity

Submitted by Anthill Limited · 29 June 2026

Introductory note: Anthill brings a perspective we believe may be under-represented in the consultation: that of an independent New Zealand energy-data aggregator that already ingests the network disclosure data of all 28 EDBs, and a candidate "specialist service provider" of the kind the Authority anticipates at paragraph 5.73(b).

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Questions	Comments
Q1. Do you agree with our assessment of the current state of the information and capabilities needed to inform network hosting capacity? If not, please explain why.	Yes. We agree most distributors understand the topology and power flows of their high-voltage networks (para 3.14, 5.45(a)). We confirm the Authority's diagnosis of the limitations from direct, daily experience: as an aggregator that ingests the disclosure data of all 28 EDBs, the binding problem we encounter is not the absence of data but its fragmentation, inconsistent structure, low (annual) update frequency, and poor machine-discoverability across distributors (para 4.9). Reconciling 28 distinct formats into a single comparable view is a substantial and recurring cost that sits between the published data and any useful application of it.
Q2. Do you agree the issues identified by the Authority are worthy of attention? If not, please explain why.	Yes. The information-asymmetry, consistency and discoverability issues are real and material, and they are precisely the friction that prevents third parties from building value-added services (forecasting, locational opportunity analysis, flexibility matching) on top of network data.
Q3. Do you agree with our assessment that now is the time to regulate for network visibility? If not, when do you consider would be the right time?	Yes. Electrification and DER uptake make the cost of delay asymmetric: the benefit of network information compounds the earlier it exists (para 4.18-4.19). Voluntary and ID-Determination progress has been uneven, so a Code obligation is warranted now.
Q4. Do you agree with our assessment of the outcomes that network visibility supports? If not, why not?	Yes. We particularly endorse para 5.2(b) and (c): standardised, comparable information at lowest cost to access seekers, and a level playing field that reduces any advantage from privately held network data.

Q5. Do you consider the proposed amendments to Part 6 of the Code would promote the Authority's statutory objective? If not, why not?	Yes, with one emphasis. The objective is best served only if the published information is genuinely machine-readable and consistent across distributors. A requirement satisfied by static maps or per-EDB bespoke formats would deliver visibility to a human reader but not the comparability and re-usability that drive competition and efficient investment. We recommend the obligation be anchored to documented, open, consistent data — see Q6 and Q8.
Q6. Are there any matters you believe are missing from the proposed Code amendment? Please specify.	We recommend the technical specifications (clause 6.3A) explicitly require: (a) Open, non-proprietary, documented data schemas with stable, versioned structure — not merely a 'downloadable format commonly used by GIS software'. Format alone does not guarantee comparability; schema does. (b) Stable common identifiers that link network elements to existing market references — GXP / POC codes, ICP where relevant, and EDB asset identifiers used in ID Determination disclosures — so data can be joined across distributors and against other datasets without manual reconciliation. (c) A consistent coordinate reference system (NZTM2000 / EPSG:2193) for all geospatial data. (d) An explicit open-data licence for published data sets, so downstream re-use and re-publication is unambiguous. (e) Persistent, documented access endpoints (the 'API enabled transfer' of para 5.7(b)) with change-logs, so automated consumers are not broken by silent format changes.
Q7. Is the indicative timeframe for implementing the proposed Code amendment likely to be adequate? If not, please provide information supporting a different timeframe, including identifying cost savings from a later implementation date.	The September 2027 indicative timeframe appears reasonable for high-voltage data that distributors largely already hold, provided the technical specifications are settled early enough to give distributors and service providers a clear target. We see no case for delay; later implementation defers benefits without materially reducing cost.
Q8. What are your views on the proposed approach where detailed information about the data sets captured within the definition of network capacity information would be contained in technical specifications?	We support placing data-set detail in technical specifications rather than the Code itself — it keeps the standard adaptable as tooling matures. The specifications are where the value of this reform is won or lost. We strongly encourage drawing on the AER's Phase 3 work (para 5.10) and aligning, where possible, with the structure of existing Commerce Commission ID Determination schedules (e.g. Schedule 12b) so distributors produce one coherent data set rather than several overlapping ones.
Q9. Do you consider that the proposal to develop network visibility specifications in consultation with interested	Yes. We would value being directly involved. Anthill works daily with the disparate formats this reform seeks to standardise and can contribute concrete schema, identifier and format recommendations grounded in that experience.

parties would be effective? If not, why not?	
Q10. Is the proposed timeframe for developing the specifications likely to be sufficient?	Approximately six months is workable but tight given the scope. It is achievable if the process reuses existing reference points (AER Phase 3, ID Determination schedules, established geospatial standards) rather than designing schemas from first principles.
Q11. Do you agree with the proposal to start with high-voltage network visibility? If not, please share your perspectives on where best to start.	Yes. A phased start on high-voltage networks is pragmatic — the data largely exists and distributors have the analytical familiarity (para 5.34). It allows standards, identifiers and publishing pipelines to be proven before the harder low-voltage problem.
Q12. Do you agree with the assumptions the Authority has made? Why/Why not?	Yes. We agree the binding constraint is publishing and standardisation capability, not the underlying availability of high-voltage data (para 5.45, 5.60). This is exactly why an outsourced / shared-service publishing model is attractive — see Q15/Q16.
Q13. Have we correctly identified the benefits of network visibility?	Yes, and we would add one: standardised, machine-readable network data is an enabling layer. Its largest benefits may be indirect — it lets independent providers build forecasting and flexibility-matching services that no single distributor would build alone. The benefit accrues to the whole market, not only to the access seeker reading one map.
Q14. Do you have any information that might help quantify the value of these benefits? If so, please provide this information.	Indicatively: integrating one distributor's disclosure data into a comparable, queryable form currently takes us meaningful manual effort per distributor per update cycle, repeated across all 28 EDBs and repeated each time formats drift. A standardised, machine-readable schema would largely eliminate this reconciliation cost — for us and for every other access seeker and analyst doing the same work in parallel. The economy-wide saving is the per-party reconciliation cost multiplied across all consumers of the data. We would be glad to share a more detailed estimate during specification development.
Q15. Have we correctly identified the costs of network visibility?	Yes. We particularly endorse the recognition (para 5.59) that smaller distributors without dedicated data/analytics teams face disproportionate cost, and the mitigations at para 5.73 — collaboration and contracting specialist service providers.
Q16. Do you have any information that might help quantify the costs? If so, please provide this information.	We can speak to the mitigation rather than the gross cost. The marginal cost of publishing standardised network data falls sharply when storage, schema-mapping, hosting and API delivery are shared across distributors rather than rebuilt 28 times. Anthill operates exactly this kind of cloud-native platform and already holds all 28 EDBs' disclosure data and geospatial grid data. A shared-service or specialist-provider model of the kind the Authority describes at para 5.73(b) and 5.74 (Counties/Unison/The Lines Company partnerships) could materially reduce the per-distributor cost — most of all for

	smaller EDBs.
Q17. Have we correctly identified the regulatory overlaps?	Yes. The overlap analysis with the ID Determination (Table 2, Appendix E) appears sound. We encourage treating the overlap as an opportunity to consolidate: a single machine-readable feed that satisfies both the EA Code obligation and the relevant Commerce Commission disclosures would reduce duplicated effort for distributors more than maintaining two parallel formats.
Q18. Do you agree with our assessment that there is a net benefit notwithstanding any regulatory overlap? If not, why not?	Yes.
Q19. Do you have any information that might help quantify the costs and benefits associated with the regulatory overlap? If so, please provide this information.	No additional quantitative data beyond the reconciliation-cost point at Q14.
Q20. Do you agree that the Authority should consider reducing the regulatory overlap as the proposed specifications are developed?	Yes — strongly. Aligning the EA specification with ID Determination schedule structures so a single data set serves both regimes should be an explicit design goal of the specification work.
Q21. Do you agree with our assessment that there will be net benefit from the proposed amendments? If not, why not?	Yes.
Q22. Do you agree the proposed amendment 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 the Electricity Industry Act 2010.	Yes. A guidance-only or status-quo approach would not deliver the consistency that makes the data useful across distributors; the Code amendment is the appropriate instrument.
Q23. Do you agree the Authority's proposed amendments comply with section 32 of the Electricity Industry Act?	We have no reason to disagree with the Authority's section 32 analysis.
Q24. Do you have any comments on the drafting of the proposed amendment?	One drafting point. Clause 6.3(2)(di) requires the capacity information in 'a downloadable format commonly used by geographical, or equivalent, information systems mapping software'. We recommend the supporting specification (clause 6.3A) tighten this to require an open, non-proprietary, documented schema with stable identifiers, so the obligation delivers comparable, joinable data and not merely a downloadable file. As drafted, two distributors could each comply while producing data that cannot be combined without manual rework.

Please indicate if you wish to be consulted during the development of the technical specifications supporting the proposed Code amendment.	Yes. Anthill Limited wishes to be consulted during development of the technical specifications. We can contribute practical schema, identifier, geospatial and API recommendations grounded in our experience aggregating and serving the network disclosure data of all New Zealand EDBs.
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