SUPA Energy

Submission to the Electricity Authority

Network Visibility Consultation

16 June 2026
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Executive summary

SUPA Energy (SUPA) is a New Zealand-based solar and battery installer with 21 staff, operating across commercial and residential sites nationwide. We connect distributed generation (DG) assets to networks daily and are directly affected by the efficiency, or at times lack, of the current connection process.

We welcome the Electricity Authority's Network Visibility consultation. In our experience, one of the greatest barriers to scaling DG in New Zealand is not commercial viability or customer appetite, but the inability to quickly and cheaply determine whether a site can connect to the network, and on what terms.

Better network visibility would be transformative

From SUPA's perspective, the industry is at an immature stage with a large amount of untapped opportunities for better utilisation of distributed energy resources (DER). This isn't a criticism of the industry. It just reflects the reality that the industry is in a stage or transition, and everyone is on a learning curve, Inevitably, some electricity distribution businesses (EDBs) will be faster to adopt, and this will provide a pathway for other EDBs to see the potential benefits of alternative solutions and alternative ways of doing things, and to be fast followers.

We understand the constraints EDBs are operating under and we understand the unintended consequences for NZ inc if uncommercial assets are thrust upon them.

We are happy to be directed as to where we can help. We are happy to avoid (or pay to play) where our activities drive costs. Our request is timely visibility, so that we can focus our efforts in locations that most benefit our clients, EDBs, and NZ Inc

1. A core issue: pre-application blindness

Our sales teams visit many potential sites every day: schools, commercial properties, industrial facilities. At each one, we face the same question: is this site viable for solar and battery? We often cannot answer that without submitting a formal DG application to the EDB and, by the time we do, we have already incurred significant costs.

The current system forces us to commit resources including engineering time, customer engagement, structural assessments and design work before we have any indication of network feasibility. This is inefficient and results in waste of time and resources for both EDBs and access seekers.

This is not a one-off. It is the daily reality of operating in this sector. The solution is not costly perfection or brute-force regulation on EDBs. The solution is giving access seekers enough information to self-select sites where connection is likely to be positive, realistic, or problematic. The key is an early 'sniff test' on costs and feasibility, so that the industry applies effort in the right places. This would not only lead to better investment, but broader credibility for our sector - when we let a customer down, the wider sector is damaged as well.

What we are asking for

SUPA recommends the Electricity Authority work with industry (EDBs and access seekers) to develop a regime under which the following is readily accessible and available:

- Publicly accessible traffic-light network maps: green (strong likelihood of easy connection), amber (possible, may need investigation), red (constrained, proceed with caution);
- street-level or ICP-level data on available kVA and known upstream congestion where practicable; and

- Clear hosting capacity data for transformers, extended from the current 500kVA threshold downward to cover the commercial DG range we operate in (10kW–5MW).

Powerco's DG hosting map, which shows 11kV and 22kV availability, is a model worth replicating nationally. It does not require perfection to be useful. A rough indication changes the economics of site assessment entirely.

2. Process inconsistency

Currently, there is no standard application process for DG. We deal with 29 different forms, timeframes, fee structures, and communication styles. The transaction costs are unduly high and inefficient for EDBs and access seekers of all sizes. For a small 21-person company, the overhead of managing 29 bilateral relationships is enormous.

We have good relationships with most networks, and we are not critical of the people, but the reality, in our experience, is often a vast range of lengthy PDF forms, no application tracking, and no indicative timelines. We have experienced cases where applications remained unresolved for months, requiring escalation through senior contacts.

There are exceptions, WEL Networks stands out as easy to work with, and we think there would be value in the Electricity Authority putting a spotlight on good and bad practice to help shape expectations and best practice precedent going forward. There is a role for education and not just regulation.

What good looks like

SUPA recommends that the Electricity Authority ensure there is:

- A consistent online platform to apply for DG, that gives a desktop feasibility assessment in real time, and tracks correspondence; and
- national reporting on application performance, given the importance of DG deployment to NZ's energy future.

We support the Electricity Authority's proposed tightening of Part 6 timeframes and welcome the obligation to publish processing performance data.

3. Application fees

Application fees, combined with the time and internal cost of preparing applications, can become a meaningful barrier when assessing multiple sites across a region.

We recognise EDBs bear costs in processing applications. However, if network visibility data reduces the volume of non-viable applications, the net administrative burden on EDBs should fall. Fewer, better-targeted applications benefit everyone.

Where a project is likely to be network-neutral or network-supportive, there may be merit in considering whether fee structures appropriately recognise potential system benefit.

4. Demand charges & network signals

Our battery systems are often (almost always) designed to top-up overnight and export during morning peaks, precisely when networks may benefit (now or in future) from flexible capacity.

We are not asking for exemptions or handouts. We are asking that pricing signals better reflect the actual cost and value of grid activity, whether based on present or future congestion signals. Our clients are often weighing up large investments, and the market needs to encourage these with efficient and cost-reflective pricing.

5. SUPA energy's alignment with networks

We want to be clear: we are not simply access seekers pushing for unbridled DG rollout. We understand why EDBs are cautious, and in fact we are not in favour of mandated roll-out of uncommercial DG that the rest of NZ Inc is forced to fund.

We are sympathetic to some of the concerns that EDBs have raised about distribution pricing reform and the risk that, if not managed well, it could result in some customers being given a 'leg up' and some customer groups being favoured at the expense of others.

We understand that costs incurred due to compliance, or blunt rules, will be passed on to other consumers, and we want to help ensure this outcome is avoided. DG can, and should reduce future network costs, while supporting local communities.

SUPA actively monitors and controls every DG asset we deploy. Most of our assets can, and will, be operated in ways that align with network needs. We are willing to take on costs when they are commercially justified and when they benefit the wider system provided that the commercials make sense. We are not asking for an unfair advantage, or for ordinary Kiwis to sponsor what we are doing.

What we need is information and clarity. Tell us where the network is under pressure and we will go there. Tell us where it is constrained and we will avoid it. Network visibility is not just good for access seekers. It is good for networks too. It's great for all New Zealanders.

Summary of asks

In summary, SUPA would like to see the following reforms, either through industry-led development of Codes and protocols or Electricity Authority regulation:

1. Publication of hosting capacity data below the current 500kVA transformer threshold.
2. Development or mandating of a national network map with at minimum a traffic-light indication of connection viability.
3. Standardisation of the DG application process across EDBs.
4. Adoption of WEL Networks' automatic acceptance model for qualifying sub-100kW connections.
5. A review of demand charge structures.
6. Publication of EDB processing performance data and maintain ongoing reporting.

We would be glad to provide further detail, case studies, or data to support this submission. Reforms in this area has the potential to support transition to a more democratic and decentralised electricity industry. The benefits could be game-changing for the electricity industry and, most importantly, for consumers and we will

work with the Electricity Authority and wider industry in any way needed to help make this happen.

Thanks,

Andy Cooper
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