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Electricity Authority | Te Mana Hiko

By email to:
distribution.feedback@ea.govt.nz

Tēnā koutou,

RESPONSE TO SUBMISSION ON IMPROVING INFORMATON ON HIGH-VOLTAGE NETWORK CAPACITY

Unison Networks Limited (Unison) and Centralines Limited (Centralines) are consumer-owned electricity distribution businesses serving communities in Hawke's Bay, Taupō, Rotorua, and Central Hawke's Bay. We appreciate the opportunity to submit on the Electricity Authority's consultation paper, Improving information on high-voltage network capacity.

As consumer-owned entities, we operate in the best interests of the communities we serve. Guided by our vision, and values, we strive to deliver economic benefits to both our customers and community shareholders, while championing a sustainable energy future. We are committed to maintaining the right balance between keeping electricity affordable and making strategic investments that secure the long-term reliability and resilience of our network. In all aspects of our operations, we place strong emphasis on meeting industry compliance requirements, ensuring we uphold all relevant standards. This approach not only supports New Zealand's transition to new energy solutions but also enables our communities to access cleaner, smarter, and more flexible energy options, now and for generations to come.

Executive Summary

We support the Electricity Authority's objective of improving visibility of high-voltage (HV) network capacity, constraints, planned investment, and flexibility opportunities. Improved visibility is an important enabler of more informed connection and investment decisions, and more efficient utilisation of existing network capacity.

Focusing on HV networks is an appropriate starting point, given comparatively stronger data availability and modelling maturity at this level.

However, as set out in this submission, the value of additional information disclosure depends on whether it can influence real-world decisions and behaviour in practice. In several areas, the proposal does not clearly demonstrate:

- the specific problem each information requirement is intended to address;
- the decision it is expected to influence; or

- the net consumer benefit relative to implementation and ongoing compliance costs.

From a customer perspective, the effectiveness of this proposal ultimately depends on whether the information provided is interpretable and actionable when making connection and investment decisions.

We support an evolutionary, principles-based approach that:
- builds on and integrates existing disclosures, particularly Asset Management Plans (AMPs);
- prioritises accessibility and decision-use, rather than creating new standalone datasets;
- reflects differences in data and capability maturity across distributors; and
- avoids prescriptive requirements that may become quickly outdated.

Consistent with this approach, our key concern is that some proposed requirements, particularly feeder-level reliability metrics and mandated identification of non-network solution opportunities, do not yet demonstrate a clear decision-use case or cost-benefit justification.

Overall, we consider that improved visibility is a necessary, but not sufficient, condition for delivering more efficient investment and flexibility outcomes. Its effectiveness depends on the availability of robust, interpretable information and its integration with broader reforms in pricing, connections, and flexibility market development.

1. Framing the Problem

We agree that improving visibility can address several inefficiencies, including:
- suboptimal location decisions by developers and large users;
- reactive and iterative connection processes; and
- missed opportunities to better utilise existing network capacity.

However, while the high-level problem is directionally clear, the consultation does not consistently demonstrate how individual information requirements translate into improved outcomes in practice.

There is limited clarity on:
- which specific decisions are currently being made inefficiently;
- which participants are expected to change their behaviour;
- how each proposed dataset will influence those decisions; and
- the magnitude and timing of resulting benefits.

This matters because, as reflected throughout this submission, the value of additional information depends not on its availability alone, but on whether it can influence real-world decisions and behaviour.

Without this linkage, there is a risk that the proposal addresses the symptom (limited visibility) without clearly demonstrating how each element of the solution delivers measurable improvements in outcomes.

2. Support for Improved Network Visibility

We support improving visibility of:

- hosting and network capacity;
- network constraints;
- planned investment and reinforcement; and
- areas where flexibility or non-network solutions (NNS) may have value.

Improved visibility is an important enabler of more informed connection and investment decisions. However, consistent with the themes set out in this submission, the value of additional information depends on whether it improves accessibility, interpretation, and decision-use in practice.

Much of the information the Authority is seeking to make more visible already exists across established channels, including:

- Asset Management Plans (AMPs);
- network development plans; and
- connection processes.

The key issue is therefore not the absence of information, but how effectively it is integrated, contextualised, and applied by users. Introducing new, parallel reporting frameworks risks duplicating existing disclosures without materially improving decision-making outcomes.

Recommendation: The Authority should prioritise integration and accessibility of existing information, focusing on how disclosures are connected and presented to support real-world decision-making, rather than introducing additional standalone reporting requirements.

3. Role of Asset Management Plans

We support improving visibility of:

- hosting and network capacity;
- network constraints;
- planned investment and reinforcement; and
- areas where flexibility or non-network solutions (NNS) may have value.

However, much of this information already exists across established disclosure channels, including:

- Asset Management Plans (AMPs);
- network development plans; and
- connection processes.

Consistent with the themes outlined above, the value of additional disclosure depends not on the volume of new information produced, but on whether it improves accessibility, interpretation, and decision-use in practice. Creating parallel reporting frameworks risks duplicating existing information without improving its usefulness to stakeholders.

This creates a risk that effort is directed toward producing additional datasets, rather than improving how existing information is integrated, contextualised, and applied in real decision-making.

Recommendation: The Authority should prioritise integration, accessibility, and coherence of existing information sources, rather than introducing new, standalone reporting frameworks. A more effective approach would be to enhance how current disclosures are connected and presented, enabling users to form a clearer, more complete view of network constraints, capacity, and development pathways.

4. Hosting Capacity and Integrated Information

We support the publication of hosting capacity information where the underlying methodologies are sufficiently robust. Improved visibility can assist with early-stage screening of connection options and help market participants better understand network conditions. However, hosting capacity information should be treated as indicative rather than definitive. It is inherently dynamic, dependent on assumptions, operating conditions, and network configuration, and may be misinterpreted as a firm entitlement if presented without appropriate context.

This distinction is important because published information does not replicate the quality of decision-making that occurs through a full connection assessment. In practice, connection outcomes are informed by application-specific factors, detailed engineering analysis, and the ability to test practical solutions or mitigations. These elements cannot be fully captured in standardised, publicly available datasets, creating a risk that such information is over-relied upon or interpreted more determinatively than intended.

For example, indicative hosting capacity values may understate what can be achieved in practice. Additional capacity can often be unlocked through targeted studies, network reconfiguration, or alternative connection arrangements. Similarly, historical reliability data may appear unfavourable while reflecting isolated or atypical events that are not representative of normal operating conditions or relevant to an applicant's investment case. In this context, hosting capacity and related visibility tools are best understood as screening or triage tools, rather than definitive indicators of available capacity or final connection outcomes.

Consistent with this approach, Unison and Centralines have already implemented a range of practical tools and initiatives to improve visibility and support more efficient use of network capacity. This includes publicly available high-voltage hosting capacity maps, which provide location-specific insights into network constraints and available capacity as an early-stage screening tool for customers and developers.

We are also progressing local flexibility initiatives, including targeted demand response and non-network solution trials in constrained areas of our networks. These are supported by

active customer engagement through workshops, connection clinics, and direct collaboration with larger customers and developers. Together, these activities ensure that published capacity information is not only accessible, but also understood, tested, and refined through real-world application.

Recommendation: Hosting capacity information should be presented alongside planned investment, known constraints, and areas where flexibility may provide value, with clear statements that all values are indicative, preliminary, and subject to further application-specific assessment.

5. Flexibility and Non-Network Solutions

We support improving transparency of where flexibility and non-network solutions (NNS) may have value, as this is an important enabler of more efficient network utilisation over time.

However, consistent with the limitations identified in Sections 4 and 6, the effectiveness of this information depends on whether it can influence real decisions and behaviour in practice. The proposal appears to assume that greater visibility will directly translate into increased flexibility uptake and NNS deployment. In our view, this relationship is not yet established.

Core issue
The proposal relies on a simplified pathway:
More information → better decisions → flexibility uptake → lower costs

While directionally correct, this pathway depends on conditions that are not yet fully in place. In particular, the constraint is not primarily a lack of information, but the current stage of market development. Key barriers include:

- limited market depth and participation;
- immature or evolving procurement frameworks;
- weak or unclear commercial incentives; and
- developing operational and integration capability.

Without progress in these areas, improved visibility alone is unlikely to result in a meaningful or sustained behavioural response.

Implications for the proposal
Requiring distributors to identify and publish defined or procurement-ready NNS opportunities at this stage risks:

- creating expectations of market response that cannot yet be realised;
- generating “opportunity registers” that are costly to develop and maintain but have limited practical uptake; and
- diverting effort away from activities that would more directly enable flexibility market development.

It also risks over-standardising what are inherently dynamic and context-specific solutions, which depend on local network conditions and evolving customer capability.
This reflects a broader theme across the proposal: the value of information is contingent on the maturity of the systems and markets required to respond to it.

Recommendation
Consistent with a proportionate and maturity-based approach, the focus should be on identifying areas where flexibility may have value, rather than requiring distributors to:

- define discrete NNS opportunities; or
- maintain procurement-ready opportunity registers.

A more appropriate approach at this stage would:

- provide high-level signals of where flexibility could deliver value;
- allow solutions to emerge through engagement and market development; and
- align disclosure requirements with the current maturity of capability across the sector.

Strategic position
This reinforces that improved network visibility is a necessary but not sufficient condition for flexibility market development. The effectiveness of information disclosure depends on parallel progress in:

- pricing reform;
- connection frameworks; and
- flexibility market design, procurement, and participation.

Without this alignment, the impact of increased information disclosure will be inherently limited, regardless of the volume or granularity of data provided.

6. Feeder-Level Reliability Metrics (SAIDI/SAIFI)

The proposed SAIDI/SAIFI disclosures illustrate this broader point. Reliability information may provide some contextual insight for prospective applicants, but we are not convinced that the proposed approach, particularly in relation to granularity, scope, and update frequency, will materially improve connection or investment decisions. Reliability metrics do not directly indicate available network capacity, connection feasibility, or the value of flexibility. Their role is therefore inherently supplementary, and this should be reflected in the proportionality of the requirement.

The proposal to provide SAIDI/SAIFI "for each circuit and each point along the circuit where design capacity changes" appears to assume that more granular data will improve decision-making. We do not think that follows. Deriving reliability metrics at that level is operationally complex, while the incremental decision value appears limited. It is unclear how that additional granularity would materially change customer behaviour or improve investment outcomes. A similar concern arises with scope. Expanding disclosure to all circuits, including sub-transmission, may reduce clarity rather than improve it, particularly where existing feeder-level metrics already incorporate upstream impacts. This creates a real risk that more information leads not to better decisions, but to more complex information that is harder to interpret correctly.

The same issue arises in relation to update frequency and interruption definitions. Quarterly updating is unlikely to materially improve decision-making when reliability performance evolves slowly over time. Likewise, if planned, unplanned, and third-party interruptions are aggregated without a clearly defined decision-use case, the usefulness of the metric becomes uncertain. In short, the SAIDI/SAIFI proposal highlights that the value of disclosure

depends not on the volume of data produced, but on whether the information is clearly linked to a real decision, a real user, and a plausible behavioural response.

Recommendation: If reliability information is included, it should be limited to simple, high-level, feeder- or circuit-level disclosure, aligned where possible with existing ID methodologies, updated on a proportionate cycle, and clearly framed as contextual information rather than a determinative signal for investment or connection decisions.

7. Data Maturity and Implementation Approach

These issues point to a broader implementation concern. The proposal appears to assume that more visibility will automatically translate into better decisions and, over time, more efficient behaviour. However, that relationship depends on the information being sufficiently robust, interpretable, and decision-ready, and on the surrounding market and operational conditions being mature enough for users to respond to it. That is not yet the case uniformly across the sector. Capability across distributors continues to vary in areas such as network modelling, hosting capacity analysis, DER forecasting, and flexibility enablement.

A uniform, prescriptive framework therefore risks requiring the production of information before it is sufficiently mature to support meaningful behavioural change. This creates two problems. First, the information itself may be inconsistent, overly caveated, or low in practical decision value. Second, distributors may incur significant compliance and system costs in producing datasets that do not yet generate commensurate consumer benefit. In effect, there is a risk that the regime becomes compliance-driven before it becomes outcome-effective.

That is why implementation approach matters. If visibility is a necessary but not sufficient condition for better market outcomes, then disclosure obligations should evolve in step with data quality, tooling, operational capability, and market maturity. Information should be required when it is sufficiently robust to improve decisions, not merely because it is conceptually desirable.

Recommendation: The Authority should adopt a phased, maturity-based implementation approach that aligns requirements with the maturity of underlying data, methodologies, tools, and market development. This would better ensure that published information is proportionate, interpretable, and capable of influencing behaviour in practice.

8. Cost–Benefit Considerations

The proposal introduces a range of ongoing obligations relating to data production, modelling, governance, publication, and continuous updates.

However, consistent with the issues raised in Sections 4–7, the value of these requirements depends on whether the information produced is sufficiently robust, interpretable, and capable of influencing real-world decisions and behaviour. In several areas, this link is not clearly demonstrated.

In particular, the relationship between:

- additional information disclosure; and

- improved investment, connection, or flexibility outcomes

is often implied rather than evidenced.

This creates a risk that information requirements are advanced ahead of the point at which they can deliver meaningful outcomes. As a result:

- datasets may be produced that are not actively used or relied upon in decision-making;
- administrative, system, and governance costs increase; and
- consumer benefits are limited, delayed, or uncertain.

This reinforces a broader theme of the submission: information is a necessary enabler, but not sufficient on its own to deliver efficient outcomes unless it is clearly linked to decision-use and supported by market and operational maturity.

Recommendation

For each proposed requirement, the Authority should clearly articulate:

- the specific problem being addressed;
- the decision the information is intended to influence;
- the expected behavioural response; and
- how the resulting benefits are expected to exceed the full lifecycle costs of implementation and ongoing maintenance.

Applying this discipline will help ensure that disclosure requirements remain:

- proportionate to their intended purpose;
- targeted to areas of genuine decision value; and
- outcome-focused, rather than becoming compliance-driven.

9. Key Drafting Considerations

Ref	Topic	Recommendation
1	Principles vs Prescription	Retain a principles-based Code and locate detailed requirements in technical specifications.
2	Definition of Capacity	Clarify that capacity is not a single static value and varies by assumptions and operating conditions.
3	Non-Network Solution Definition	Provide clarity on what constitutes an “opportunity” to ensure consistent interpretation.
4	Avoid De Facto Commitments	Ensure published forward-looking information is clearly indicative, not binding.
5	Alignment with Existing Obligations	Avoid duplication with recent Part 6 requirements (e.g. export congestion, capacity disclosure).
6	Recognition of Existing Disclosure Channels	Allow compliance via existing mechanisms (e.g. AMPs), provided information is accessible.

10. Position within the Authority’s Broader Reform Programme

The proposal reflects a broader regulatory logic:

Improved visibility → better-informed decisions → more efficient behaviour → increased flexibility → lower system costs

We support this direction and agree that improved network visibility is a critical enabler of more efficient system outcomes.

However, as highlighted throughout this submission, visibility should be understood as a **necessary—but not sufficient—condition** for achieving these outcomes.

Improved information disclosure alone will not deliver:

- effective flexibility market development; or
- meaningful non-network solution uptake.

The ability of information to translate into behavioural change depends on the presence of complementary market and regulatory conditions.

This reinforces a core theme of our submission:

the value of information is contingent on its ability to influence decisions in practice, which in turn depends on market maturity, commercial incentives, and operational capability.

Implications for the reform programme

To be effective, information disclosure requirements must be:

- **proportionate** to the maturity of underlying data and tools;
- **aligned** with the capability of market participants to respond; and
- **integrated** with the broader reform programme.

Improved visibility will only translate into efficient outcomes where it is supported by:

- pricing reform that provides actionable signals;
- connection frameworks that enable flexible and efficient access; and
- flexibility market design, procurement mechanisms, and participation.

Without this alignment, there is a risk that increased visibility delivers information without response, limiting its impact on system outcomes regardless of the volume or granularity of data provided.

Strategic position

Accordingly, we consider that the effectiveness of this proposal should be assessed not in isolation, but in the context of its role within the Authority's broader reform programme.

An integrated, phased approach, where visibility evolves alongside pricing, connection, and flexibility market development, is more likely to deliver enduring benefits than a standalone expansion of disclosure requirements.

Conclusion

We support improving visibility of high-voltage network capacity and agree this is an appropriate and necessary starting point.

However, as set out in this submission, the effectiveness of improved information disclosure depends on whether it can influence decisions and behaviour in practice. Visibility is therefore a necessary, but not sufficient, condition for delivering more efficient investment and flexibility outcomes.

To maximise benefits and minimise unintended consequences, we recommend that the Authority:

- adopt an evolutionary, principles-based framework aligned with market and data maturity;
- leverage and integrate existing disclosures, rather than creating duplicative reporting requirements;
- ensure that all proposed datasets have a clear decision-use case and demonstrated cost-benefit justification;
- reconsider the inclusion of feeder-level reliability metrics, where decision value is not clearly established; and
- recognise that visibility must be integrated with pricing reform, connection frameworks, and flexibility market development to deliver meaningful outcomes.

An approach grounded in proportionality, integration, and practical decision-use is more likely to deliver enduring consumer benefits than one focused on expanding information requirements in isolation.

Ngā mihi nui,

JASON LARKIN / TARRYN BUTCHER
GM COMMERCIAL AND REGULATORY / REGULATORY MANAGER
[redacted]

Appendix B Submission form

Improving information on high-voltage network capacity

Submitter	Unison Networks Limited

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.	However, capability varies across distributors, and hosting capacity information remains dependent on assumptions and context. It should be treated as indicative rather than definitive. Unison and Centralines' experience reflect this. While we have developed publicly available high-voltage hosting capacity maps to support early-stage screening, these tools require careful interpretation and are complemented by detailed connection assessment and customer engagement.
Q2. Do you agree the issues identified by the Authority are worthy of attention? If not, please explain why.	Yes. Limited visibility can contribute to inefficient location decisions, reactive connection processes, and underutilisation of existing network capacity
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?	Partially. Progressing visibility is appropriate, but requirements should be phased to reflect data and market maturity. Premature prescription risks low-value outcomes and may cut across tools and approaches already being developed by distributors, including existing hosting capacity mapping and customer-facing processes.
Q4. Do you agree with our assessment of the outcomes that network visibility supports? If not, why not?	Directionally yes. However, achieving these outcomes depends on information translating into behavioural change, which is not solely driven by visibility. In our experience, tools such as hosting capacity maps are most effective when combined with active customer engagement and the ability to test connection-specific solutions. Visibility alone is unlikely to deliver the intended outcomes without these supporting elements.
Q5. Do you consider the proposed amendments to Part 6 of the Code would promote the Authority's statutory objective? If not, why not?	Partially. We support the objective, but some requirements are not yet clearly linked to decision-use or proportionate to their cost. Unison and Centralines have already invested in practical tools, including hosting capacity maps and customer engagement processes, to improve visibility. Additional requirements should build on these existing approaches rather than duplicate or constrain them.
Q6. Are there any matters you believe are missing from the proposed Code amendment? Please specify.	Yes. Greater emphasis is needed on: • decision-use clarity; • contextual interpretation of data; • market maturity constraints; and • recognition of existing distributor tools and practices, including hosting capacity maps, local flexibility initiatives, and customer engagement processes.
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 proposed timeframe may be challenging if applied uniformly. A phased approach aligned to capability maturity would improve cost-benefit outcomes
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?	Yes. This is preferable. The Code should remain principles-based, with detail contained in adaptable technical specifications
Q9. Do you consider that the proposal to develop network visibility specifications in consultation	Yes. A collaborative approach is appropriate to ensure practicality, consistency, and proportionality across the sector.

with interested parties would be effective? If not, why not?	
Q.10. Is the proposed timeframe for developing the specifications likely to be sufficient?	Potentially, provided it allows sufficient engagement and reflects implementation complexity and capability variation.
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. HV networks are the most appropriate starting point given comparatively stronger data availability and modelling maturity. This aligns with current industry practice, including existing HV hosting capacity mapping undertaken by distributors.
Q12. Do you agree with the assumptions the Authority has made? Why/Why not?	Partially. Key assumptions, particularly regarding flexibility market responsiveness and decision-use of certain datasets, are not yet well evidenced
Q13. Have we correctly identified the benefits of network visibility?	Partially. The high-level benefits are reasonable, but the link between specific datasets and realised benefits is not consistently demonstrated
Q14. Do you have any information that might help quantify the value of these benefits? If so, please provide this information.	We do not have quantified estimates. However, benefits depend on information being sufficiently robust and used in decision-making, which is not yet clearly established.
Q15. Have we correctly identified the costs of network visibility?	Broadly yes. However, ongoing compliance costs (systems, governance, updates) may be understated relative to their cumulative impact
Q16. Do you have any information that might help quantify the costs? If so, please provide this information.	We do not have quantified estimates. However, costs are likely to be significant and ongoing, particularly for data maintenance and publication systems.
Q17. Have we correctly identified the regulatory overlaps?	Yes. There is overlap with existing disclosures, particularly AMPs and Part 6
Q18. Do you agree with our assessment that there is a net benefit notwithstanding any regulatory overlap? If not, why not?	Not yet clearly demonstrated. The case would benefit from stronger evidence that incremental benefits exceed costs
Q19. Do you have any information that might help quantify the costs and benefits associated with the regularly overlap? If so, please provide this information.	We do not have quantified estimates. However, duplication risks inefficiency and increased compliance burden without improving decision outcomes.
Q20. Do you agree that the Authority should consider reducing the regulatory overlap as the proposed specifications are developed?	Yes. Reducing duplication and enabling use of existing disclosures would improve efficiency and proportionality
Q21. Do you agree with our assessment that there will be net benefit from the proposed amendments? If not, why not?	Not yet demonstrated. The proposal would benefit from clearer evidence linking specific requirements to measurable outcomes (Section 8).
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.	We support a modified version of the proposal that adopts: • a principles-based framework; • phased, maturity-based implementation; and • integrated use of existing disclosures.
Q23. Do you agree the Authority's proposed amendments comply with section 32 of the Electricity Industry Act?	We consider the proposal would benefit from further evidence that: • benefits outweigh costs; and • requirements are proportionate to the problem being addressed.
Q24. Do you have any comments on the drafting of the proposed amendment?	We support: • a principles-based Code with detailed requirements in technical specifications; • clearer definitions of capacity and NNS opportunities; and • drafting that avoids creating de facto commitments and duplication
Please indicate if you wish to be consulted during the development of the technical specifications supporting the proposed Code amendment.	Yes – we would welcome the opportunity to be consulted during the development of the technical specifications supporting the proposed Code amendment.