Vector Limited
110 Carlton Gore Road
PO Box 99882
Newmarket
Auckland 1149
+64 9 978 7788 / vector.co.nz

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Electricity Authority
PO Box 10041
Wellington 6143
By email: distribution.feedback@ea.govt.nz

Tēnā koutou,

Improving information on high-voltage network capacity – Vector response to consultation paper

Vector welcomes the opportunity to provide feedback to the Electricity Authority Te Mana Hiko on its consultation paper, Improving information on high-voltage network capacity. This submission is not confidential and may be published in full on the Authority's website.

Vector supports the Authority's intent to improve network visibility. Better visibility of network capacity and constraints may support more informed connection decisions, reduce inefficient speculative applications, improve planning conversations between distributors and access seekers, and help identify where flexibility and non-network alternatives may provide value.

Vector has previously supported practical improvements to network, particularly where they focus on useful, decision-grade information rather than overly prescriptive datasets. In our earlier response to the Authority's Exploring Network Visibility discussion paper, Vector emphasised that visibility should start with practical datasets, enable easy access to data, support digitalisation and analytics, and preserve privacy, security and social licence.

The Authority's current proposal would require distributors to publish capacity information about their high-voltage networks, including current and forecast load and export capacity, network topology, planned upgrades, historical reliability, and potential use of non-network solutions, in standardised formats such as maps and downloadable datasets. While we support the intent of these proposals, we don't believe that implementing the full suite of proposals is a practical approach. Networks are managing new information disclosure obligations, are beginning to demonstrate shared platforms to publish opportunities for the use of non-network solutions and are starting to publish network capacity maps and a less prescriptive approach at this time may be more cost-effective.

We note that the proposals need to be supported by practical technical specifications developed collaboratively and transparently with distributors, access seekers, flexibility providers and other relevant parties. These specifications should address overlaps between regulatory agencies, define required datasets, assumptions, formats, refresh frequencies, access arrangements and treatment of uncertainty. The implementation timelines need to recognise the system, data, governance, cyber security and resourcing effort required to minimise the additional costs on consumers so that the benefits can be realised.

We are available to discuss this submission and contribute to the development of technical specifications.

Ngā mihi,
Matt Smith
Policy Advisor
[redacted]

EXECUTIVE SUMMARY

Vector supports improving information on high-voltage network capacity. Better visibility may support more informed pre-application decisions, more efficient connection discussions, fewer speculative enquiries, and better identification of flexibility and non-network opportunities. However, the benefits will depend on a practical approach. Published information should be clearly identified as indicative. Vector's key positions are:

- Vector supports a high-voltage first approach as the most practical starting point.
- The framework should prioritise useful information for screening and early engagement, with clear assumptions, caveats and metadata.
- Published capacity information should be clearly defined as indicative only. It should not create a right to connect, reserve capacity or replace a project-specific connection assessment.
- Vector supports collaboratively developed technical specifications that can evolve over time.
- Implementation should be staged and realistic, starting with a minimum viable high-voltage specification and refining it over time as benefits are clearly identified.
- The framework should protect privacy, cyber security, operational security and commercial confidentiality, including by allowing sensitive information to be aggregated, generalised or withheld where justified.
- Forecasts for the expected use of non-network solutions should not be grouped with current and historical network state information at this time. It is forward-looking, contingent on market responses and procurement decisions, and materially more uncertain than underlying network data.
- The Authority should minimise overlap with existing Part 4 disclosures and should not create a parallel SAIDI/SAIFI reporting obligation through the network visibility framework.
- The proposal is only likely to deliver net benefits if implemented proportionately, with practical specifications, realistic costs and minimal duplication.

Responses to specific questions posed

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.?
Vector broadly agrees with the Authority's assessment that distributors have better information and capability to analyse information for their high-voltage networks than for their low-voltage networks. High-voltage networks are generally supported by better asset records, planning models, operating visibility and network studies. However, Vector recommends that the Authority more clearly distinguish between three related but different concepts in their discussion of the proposals: distributor visibility of its own network for planning and operational purposes; publication of indicative information to support access seekers' pre-application decisions; and detailed connection studies that determine whether a specific project can connect at a specific location and on what terms. These should not be treated as interchangeable. A distributor may have sufficient information to publish useful high-level capacity indicators without being able to provide a binding view on the connection feasibility of a specific project without further engineering analysis. Vector also cautions the Authority to not imply that hosting capacity is a single static value. Hosting capacity is an estimate that is constantly changing due to localised conditions. It depends on assumptions about demand, generation, network configuration, outage conditions, protection settings, voltage, power quality and the expected behaviour of connected or future DER. This means that any published information will be accompanied by assumptions, caveats and metadata. The current state of capability also varies between distributors. Some already publish high-voltage capacity maps or related information, while others may need to build systems, processes and governance arrangements. A proportionate approach should recognise these different starting points while still moving the sector toward a common minimum level of useful visibility.
Q2. Do you agree the issues identified by the Authority are worthy of attention? If not, please explain why.
Yes. Vector agrees that the issues identified by the Authority are worthy of attention. New Zealand's energy transition is changing how distribution networks are used. Electrification, distributed generation, batteries, EV charging, flexible demand and new commercial models are increasing the need for better information about where network capacity exists, where constraints are emerging, and where flexibility or non-network alternatives may have value. Better network visibility can reduce information asymmetry between distributors and access seekers. It can also reduce the number of speculative or poorly located connection enquiries, allowing engineering effort to be focused on projects with a clearer prospect of proceeding efficiently.

Vector has previously submitted that network visibility matters because it supports faster and more predictable connections, informs hosting capacity and constraint management, and underpins the orchestration that can defer capital expenditure and lower total system cost.
However, the issue is both a disclosure issue and a data capability issue. Disclosure obligations will not be effective if the underlying data is incomplete, inconsistent, stale or not suitable for the intended use. For high-voltage networks, the data foundations are generally stronger. For low-voltage networks, data access and quality remain more significant constraints.

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?

Vector agrees that now is an appropriate time to consider a proportionate regulatory framework for high-voltage network visibility.
There is maturity in high-voltage network information and increasing demand from access seekers to justify a common approach. Vector considers that regulation should be staged and practical. The Authority should avoid imposing requirements that are more detailed than current data quality and systems capability can support. The first stage should focus on useful high-voltage information that can support pre-application decision-making, rather than attempting to create a fully dynamic or highly granular capacity platform from the outset.
For low-voltage visibility, Vector considers that further enabling work is needed before comparable obligations could be implemented efficiently. This includes improved access to smart meter operational data, standardised data definitions and formats, clearer roles for metering equipment providers, and appropriate privacy and cyber security arrangements.

Q4. Do you agree with our assessment of the outcomes that network visibility supports? If not, why not?

Yes. Vector agrees that network visibility may support better outcomes for consumers, access seekers, distributors and the wider electricity system.
In particular, network visibility can support more informed connection and investment decisions; better siting and sizing of generation, storage, load and flexibility resources; fewer speculative or poorly targeted connection applications; better planning conversations between distributors and access seekers; improved identification of areas where non-network alternatives may have value; more efficient use of existing network assets; and better regulatory and stakeholder understanding of network constraints and investment needs.
However, these outcomes will only be achieved if published information is interpreted correctly. A map or dataset can be useful for screening and early engagement, but it cannot replace a project-specific connection assessment. The framework should therefore make clear that published hosting capacity information is indicative and conditional.
Vector also considers that the Authority should recognise the role of network visibility in enabling future distribution system operation. As more DER and flexible load connect to distribution networks, visibility of both DER and network conditions will be a foundational capability for safe orchestration, operating envelopes, flexibility procurement and efficient network planning.

Q5. Do you consider the proposed amendments to Part 6 of the Code would promote the Authority's statutory objective? If not, why not?

Vector considers that a subset of the proposed amendments have the potential to promote the Authority's statutory objective, provided they are implemented proportionately.

The proposal can support competition by reducing information asymmetry and enabling a wider range of access seekers and service providers to identify locations where connection or service provision may be efficient. It can support reliability by improving understanding of constraints and enabling better planning and coordination. It can support efficiency by helping parties make better siting, timing and sizing decisions.

However, the amendments should be framed carefully to avoid unintended consequences. In particular, the Code should make clear that published capacity information is indicative; is not a connection approval; is not a capacity reservation; is not a guarantee that capacity will remain available; is not a substitute for a connection application or detailed study; and may change as network conditions, forecasts and other applications change.

There is a risk that published information could be misinterpreted, leading to disputes, inefficient expectations or pressure to treat indicative information as a binding commitment.

Q6. Are there any matters you believe are missing from the proposed Code amendment? Please specify.

Vector considers that several matters should be made clearer in the proposed Code amendment or in the supporting framework.

First, the Code should expressly clarify the legal status of published network capacity information. It should state that the information is indicative and intended to support pre-application decision-making. It should not create a connection right, capacity reservation, priority right, or obligation to connect a project without following the relevant connection process.

Second, the Code or specifications should address cyber security, operational security, privacy and confidentiality. Some network information may be sensitive if published at excessive granularity. The framework should allow distributors to aggregate, generalise or withhold information where publication would create legitimate security or confidentiality risks. We have heard from customers, who connect at the high voltage levels of our network, expressing concern that public disclosure of information about dedicated assets would expose them to operational and commercial risks.

Third, the Code should provide for the technical specifications to evolve. Network visibility capability will mature over time, and the supporting specifications should be able to be updated without requiring frequent Code amendments.

Fourth, the framework should clarify the treatment of forecast information. Forecast hosting capacity is inherently uncertain and should be published with assumptions, confidence indicators or qualitative ranges where appropriate.

Fifth, the framework should recognise that network visibility is part of a wider regulatory ecosystem. It should be coordinated with connection pricing, export limits, future distribution system operation, smart meter data access and Commerce Commission information disclosure settings.

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.

Vector supports timely progress but recommends a staged implementation pathway.

The adequacy of the timeframe will depend on the final scope of the obligation and the level of detail required by the technical specifications. If the initial obligation is limited to practical, high-voltage datasets with clear assumptions and caveats, implementation may be achievable sooner. If the specifications require more granular modelling, more frequent refreshes, new publication platforms, APIs, or detailed non-network solution information, the required implementation period will be longer.

A rushed implementation would increase the risk of inconsistent outputs, lower data quality, user confusion and rework. It may also increase cost if distributors need to build interim solutions that later need to be replaced once specifications mature.

Vector recommends that the Authority separate implementation into stages: finalisation of technical specifications in consultation with EDBs and users; initial publication of core high-voltage network visibility information; refinement based on user feedback and data quality review; and development of a future roadmap for enhanced data access and low-voltage visibility.

This approach would deliver useful information while reducing implementation risk and avoiding unnecessary rework.

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?

Vector supports this approach.

The Code should set the obligation at a high level, while technical specifications should define the practical implementation details. This is preferable to embedding detailed dataset requirements directly in the Code, because the relevant data, formats, analytical methods and user needs will evolve.

Technical specifications should define, at minimum: dataset categories; data fields and units; update frequency; modelling assumptions; metadata requirements; treatment of uncertainty; publication formats; security and confidentiality controls; user guidance; and review processes.

Vector also recommends that the specifications allow for staged maturity. Some distributors may be able to publish more detailed information earlier than others. The specifications should create common minimum expectations without discouraging innovation or additional publication where it is useful and safe.

The specifications should also distinguish between information used internally for planning and operations and information suitable for public release. Publication-quality information requires additional validation, contextualisation and governance.

Q9. Do you consider that the proposal to develop network visibility specifications in consultation with interested parties would be effective? If not, why not?

Vector strongly supports developing the network visibility specifications in consultation with interested parties.

Consultation is essential because the specifications need to be both useful for access seekers and practical for distributors to implement. Access seekers, flexibility providers, developers, retailers, metering equipment providers and distributors will each have different perspectives on what information is valuable, how it should be accessed, and what limitations need to be understood.

A collaborative process will also reduce the risk of over-specification. It will help ensure that the required datasets are aligned with actual decision-making needs, rather than requiring information that is costly to produce but of limited practical value.

Vector recommends that the consultation process include practical testing of draft outputs. For example, sample maps, downloadable datasets and metadata templates could be tested with users before specifications are finalised. This would improve usability and reduce implementation risk.

Vector wishes to be consulted during development of the technical specifications.

Of note, we have heard from HV connected parties asking that information on network infrastructure that is dedicated to specific sites not be made public due to commercial sensitivities. This could include dedicated infrastructure such as cables and zone substations. There is concern that public disclosure of this data would allow third parties to derive commercially sensitive information and introduce security concerns for the operations of those sites.

Q10. Is the proposed timeframe for developing the specifications likely to be sufficient?

Vector's view is that the timeframe is only sufficient if the initial specifications are kept focused and practical.

Developing useful specifications will require agreement on definitions, datasets, modelling assumptions, refresh frequency, metadata, security treatment and publication formats. These issues are not trivial. If the Authority seeks to develop detailed specifications for all of the proposed information categories at once, the timeframe is too compressed.

Vector recommends that the Authority prioritise a minimum viable specification for initial high-voltage publication. This could then be refined over time as distributors and users gain experience with the information.

A staged approach reduces risk and allows the sector to learn from real-world use and progressively improve quality, consistency and usability.

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. Vector agrees that high-voltage network visibility is the right place to start.

High-voltage networks are generally better understood, better modelled and better monitored than low-voltage networks. Starting with high voltage is therefore a pragmatic approach that can deliver useful information sooner and at lower cost than attempting to cover all voltage levels immediately.

The Authority's consultation paper states that most distributors already have good visibility of their high-voltage assets and power flows, and that focusing first on high-voltage networks would reduce costs compared with a broader proposal that also covered low-voltage networks. Vector agrees with that general assessment.

However, high-voltage visibility should not be treated as the endpoint. The greatest long-term visibility challenge is likely to be at low voltage, where many consumer-owned DER and flexible loads connect. EV charging, rooftop solar, batteries, smart hot water, smart appliances and future vehicle-to-grid technologies will increasingly affect local network operation.

Vector therefore supports a high-voltage first approach, accompanied by a clear roadmap for future low-voltage visibility. That roadmap should focus on smart meter operational data, data

access rights, standardised data schemas, API-based access and privacy-preserving use of granular data.

Q12. Do you agree with the assumptions the Authority has made? Why/Why not?

Vector agrees with several of the Authority's key assumptions, particularly that high-voltage visibility is a practical starting point and that improved information can support better connection and investment decisions.

However, Vector recommends caution around any assumptions that suggest hosting capacity information can be produced or used as a simple, stable and directly comparable number across all networks.

Hosting capacity depends on technical assumptions and operating conditions. It can vary based on normal versus contingency operating states; current and forecast load; current and forecast export; planned outages and network reconfiguration; voltage and power quality constraints; protection settings; asset ratings; DER behaviour; diversity assumptions; and other connection applications.

Vector also recommends that the Authority avoid assuming that publication alone will deliver benefits. The benefits will depend on the usability of the information, the quality of metadata, the ability of users to interpret it correctly, and the relationship between indicative information and connection processes.

The Authority should also recognise that distributors will incur ongoing costs, not only one-off implementation costs. Network visibility information must be maintained, refreshed, quality assured and governed over time.

Q13. Have we correctly identified the benefits of network visibility?

Yes, Vector considers that the Authority has broadly identified the key benefits of network visibility.

The most important benefits are likely to include improved pre-application decision-making by access seekers; better location and sizing decisions for new load, generation, storage and flexibility resources; reduced speculative connection applications; more efficient use of distributor engineering resources; improved identification of potential non-network solution opportunities; better network planning and regulatory understanding; more transparent conversations between distributors and stakeholders; and support for future flexibility markets and distribution system operation.

Vector particularly supports the Authority's recognition that improved visibility can help those wanting to connect to or use networks make more informed decisions. The Authority's consultation paper identifies that increased transparency and better understanding of capacity and connection size across locations is expected to streamline connection processes, reduce speculative applications and support more efficient investment decisions by access seekers.

However, the benefits will be maximised only if the information is decision-grade, appropriately caveated and kept reasonably current.

Q14. Do you have any information that might help quantify the value of these benefits? If so, please provide this information.

We consider that the Authority should assess benefits across several categories.

First, there may be avoided transaction costs where access seekers can self-screen locations before approaching distributors. This could reduce speculative enquiries and allow distributor engineering resources to focus on more viable projects.
Second, there may be avoided or deferred network costs where better information enables access seekers or flexibility providers to locate in areas where they provide greater value or impose lower costs.
Third, there may be reduced connection processing costs where access seekers are better informed before submitting applications.
Vector recommends that the Authority avoid relying solely on quantified benefits that are difficult to measure precisely. Some benefits, such as improved transparency, better stakeholder confidence and better coordination, may be material even if difficult to quantify.

Q15. Have we correctly identified the costs of network visibility?

The Authority has identified some relevant cost categories but has not recognised the full extent of implementation and ongoing costs.
The costs are not limited to publishing a map or dataset. They include data acquisition (noting that Vector still do not have full access to smart meter data across our network); data extraction and cleansing; network model development and validation; hosting capacity methodology development; software and analytical tools; publication platforms; cyber security review; privacy and confidentiality review; internal governance; quality assurance; staff training; stakeholder engagement; user guidance; ongoing refresh and maintenance; and responding to user questions or misinterpretations.
The Authority should also recognise the costs of any new or reformatted SAIDI/SAIFI reporting obligations being proposed. Vector already maintains reporting processes, data models, audit processes and governance arrangements for reliability reporting to the Commerce Commission. SAIDI/SAIFI data models have strict definitions, and reporting can involve multiple fact tables, historical data, planned and unplanned outage data, ICP-level outage information, and audit/disclosure considerations. Any requirement to repackage those metrics for a separate network visibility regime with different reporting cycles and definitions would create incremental systems, assurance, governance and reconciliation costs.
Network wide SAIDI and SAIFI requirements are set by the Commerce Commission using years of historical data to provide an indicator of total network performance. Using the same metric to observe small sections of the network over just 12-month periods becomes difficult to implement; to explain; and may not provide useful insights to connecting parties. Comparable overseas reporting regimes take a simpler approach to reporting reliability at the feeder level by disclosing counts of unplanned outages that exceed a duration threshold to be classified as a sustained outage. This approach is simpler to implement and potentially simpler to understand for connecting parties, even though historic reliability data is not an indication of the current network status.
Costs will also vary significantly between distributors depending on existing systems, data access, data maturity, network complexity and publication capability.
The Authority should also recognise the risk of rework if technical specifications are developed too quickly or amended materially after implementation has begun.

Q16. Do you have any information that might help quantify the costs? If so, please provide this information.

We recommend that the Authority distinguishes between one-off implementation costs; ongoing operating costs; incremental costs relative to existing capability; costs driven by mandatory minimum requirements; and costs associated with optional enhanced publication.
Some distributors may already have capacity maps or related tools that they will need to update to fit the Authority's proposals, while others may need to build that capability.
The Authority should also distinguish between costs associated with high-voltage visibility and costs associated with any future low-voltage visibility. Low-voltage visibility is likely to involve materially greater costs for data, modelling and operational complexity, particularly where smart meter operational data is incomplete or not consistently accessible

Q17. Have we correctly identified the regulatory overlaps?

Vector agrees that there are regulatory overlaps, particularly between the Authority's proposed Code obligations and the Commerce Commission's information disclosure regime under Part 4 of the Commerce Act.

The Authority's paper recognises that both the Authority and the Commerce Commission require distributors to disclose certain information relevant to network visibility, with the Commission's disclosure requirements focused on enabling interested parties to assess whether distributors are producing outcomes consistent with competitive markets, and the Authority's requirements focused on access to distribution networks.

SAIDI and SAIFI are already part of the Commerce Commission's reliability and quality reporting framework. Vector does not support the Authority using Part 6 network visibility specifications to create a parallel or duplicative SAIDI/SAIFI reporting obligation. If historical reliability information is required for access-seeker decision-making, the specifications should allow distributors to reference existing Commerce Commission disclosures and should only require additional reliability disclosures where the Authority can demonstrate that it is necessary, proportionate and directly connected to the access-related purpose of the Code amendment.

It will be inefficient for distributors to produce similar information in different formats, at different times, for different regulators, under inconsistent definitions.

The Authority should also consider overlaps with Part 6 connection processes; distribution pricing and connection pricing reforms; export limit settings; future distribution system operation work; smart meter data access settings; Consumer Data Right developments; and cyber security and critical infrastructure obligations.

Q18. Do you agree with our assessment that there is a net benefit notwithstanding any regulatory overlap? If not, why not?

The Authority has not provided enough evidence to show a net benefit for providing the data at the level proposed with significant uncertainties about both the costs and benefits delivered.
The proposed amendments are intended to serve a distinct access-related purpose helping access seekers understand network capacity and reliability to make better connection and investment decisions, however there are gaps in both estimating the costs per annum and the number of connecting parties that would benefit (and the value of those benefits) per annum to determine if there is a net benefit.
The Authority must take active steps to minimise duplication with the Commerce Commission's disclosure regime to improve the chance of these proposals resulting in a net benefit. Existing information disclosures should be reused or referenced where possible, new definitions should

be aligned with existing disclosure categories, and IF different formats are required, the Authority should ensure that the incremental benefit justifies the incremental cost.
Coordination between regulators will be critical to ensure that the overall regulatory framework remains coherent and proportionate.

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.

The main costs of regulatory overlap are likely to arise where distributors must collect similar information for different purposes; transform the same underlying data into multiple formats; reconcile inconsistent definitions; meet different publication timelines; maintain parallel governance processes; or respond to multiple regulators on similar issues.
The potential benefits of overlap, if there is good consistency across the regulatory bodies, may include improved transparency, better regulatory scrutiny and more consistent stakeholder understanding.
Vector recommends that the Authority and Commerce Commission jointly consider where existing information disclosure outputs can be leveraged for network visibility purposes and gather appropriate information to understand when and where genuinely new regulatory disclosures are required.

Q20. Do you agree that the Authority should consider reducing the regulatory overlap as the proposed specifications are developed?

Yes. Vector strongly agrees that the Authority should consider reducing regulatory overlap as the proposed specifications are developed.
This should be a core design principle for the technical specifications. The specifications should identify what information is already disclosed under existing regimes; what information can be reused or referenced; what information requires new publication; whether definitions align with existing disclosures; whether timing can be aligned; and whether publication platforms can be streamlined.
Reducing overlap will lower compliance costs and improve usability for stakeholders. It will also reduce the risk of inconsistent information being published under different regulatory obligations.
Vector recommends that the Authority involve the Commerce Commission in specification development and provide distributors with clear guidance on how the new obligations interact with existing disclosure requirements.

Q21. Do you agree with our assessment that there will be net benefit from the proposed amendments? If not, why not?

Vector agrees that a subset of the proposed amendments could deliver a net benefit if implemented in a proportionate and staged way.
The key benefits are improved transparency, better access seeker decisions, more efficient connection conversations, reduced speculative enquiries and improved ability to identify flexibility and non-network opportunities.
However, the net benefit depends on the final design. A positive net benefit is more likely if initial obligations focus on high-voltage networks; publication requirements are practical and proportionate; datasets include clear assumptions and caveats; technical specifications are developed collaboratively; implementation timeframes are realistic; security and privacy risks are managed; regulatory overlap is minimised; and future low-voltage visibility is progressed through a separate data capability roadmap.

The net benefit would be reduced if obligations require excessive precision, overly frequent updates, publication of sensitive information, or costly systems that are not justified by user needs.

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.

Vector is not convinced that the proposed amendment is preferable to other options that are more pragmatic.

Distributors are making progress in this space, and a highly prescriptive approach should be more fully evaluated before introduction. Network visibility methods, data sources and user needs will evolve. Hard-coding detailed datasets and methodologies into the Code now could reduce flexibility and require frequent amendments.

Vector supports collaborative development of the technical specifications prior to introducing changes to the Code. This would provide a direction for consistency across EDBs, allowing the details to evolve, and providing a chance to review the need for Code changes.

Q23. Do you agree the Authority's proposed amendments comply with section 32 of the Electricity Industry Act?

The proposed amendments are consistent with the Authority's stated goals to provide access seekers with information to efficiently site connections and investments, however it is not clear if there is a net benefit to all consumers.

Given the overlap with Commerce Commission, Vector supports the Authority consulting closely with the Commerce Commission to ensure the final drafting does not inadvertently regulate matters more appropriately addressed under Part 4 of the Commerce Act.

Q24. Do you have any comments on the drafting of the proposed amendment? Please indicate if you wish to be consulted during the development of the technical specifications supporting the proposed Code amendment.

- Ensure that the published network capacity information is identified as indicative and does not create a right to connect, a reservation of capacity, a priority right, or a guarantee that capacity will be available at the time an access seeker applies.
- Allow distributors to withhold, aggregate or generalise information where publication would create cyber security, operational security, privacy, confidentiality, commercial risk to connected parties, or public safety risks.
- Avoid duplicating existing information disclosure obligations. Where existing disclosures meet the purpose, distributors should reference or reuse them. SAIDI and SAIFI are already part of the Commerce Commission's reliability and quality reporting framework. Vector does not support the Authority using Part 6 network visibility specifications to create a parallel or duplicative SAIDI/SAIFI reporting obligation.
- Ensure the obligation is proportionate and does not require distributors to publish information that is not reasonably available, not sufficiently reliable, or not useful for access seekers.
- Address the use of non-network services separately from these proposals to provide information to connecting parties.

Vector wishes to be consulted during development of the technical specifications supporting a proposed Code amendment.