10 June 2026

Electricity Authority
PO Box 10041
Wellington 6143

Via email: distribution.feedback@ea.govt.nz

Consultation Paper – Improving information on high-voltage network capacity

WEL Networks appreciates the opportunity to provide feedback on the above consultation.

WEL Networks (WEL) is New Zealand's sixth largest electricity distribution company and is 100% owned by our community through our sole shareholder WEL Energy Trust. Our guiding statement of strategic intent is to be leading Waikato's energy future, and we work to ensure that our customers have access to reliable, affordable, and environmentally sustainable energy.

WEL supports the move to published HV capacity mapping as it could prove beneficial to the wider industry. We do not support the amendments as proposed as it is overreaching in the extent of information to be published in the first instance, and it is without quantification of asserted benefits of the additional items sought that would justify the extensive additional costs.

Our responses to the specific questions sought by the Authority are attached and should you require clarification on any part of this submission, please do not hesitate to contact me.

Yours sincerely

[redacted]

Andrew Maseyk
Regulatory Specialist
[redacted]

Appendix B Submission form

Improving information on high-voltage network capacity

Submitter	WEL Networks

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.	Broadly, yes, in relation to HV networks. However, the proposal appears to understate the effort required to turn internal engineering and planning information into a standardised, public-facing tool that can be maintained, interpreted, and relied on by third parties. WEL also notes that if the objective is to support wider customer benefit and DER uptake, the largest hosting capacity issues for most consumers sit at LV level, where the majority of ICPs connect and where voltage rise and phase clustering are often the material constraints. This does not mean the proposal should be expanded to LV at this stage, but it does mean the Authority should be careful not to overstate the consumer benefit of HV capacity maps.
Q2. Do you agree the issues identified by the Authority are worthy of attention? If not, please explain why.	Yes. WEL agrees that network visibility, connection efficiency, and the efficient use of existing network capacity are all worthy of attention. However, the Authority has not made the case that better internal network visibility for distributors necessarily requires broad publication of that information to third parties. These are related issues, but they are not the same issue. The benefits of public disclosure should therefore be assessed on their own merits, against the cost and effort required to provide it.
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?	WEL supports a staged and proportionate approach to network visibility regulation. We consider that the logical starting point is publication of basic current HV capacity information, with the scope limited to information that is practical, useful, and capable of being produced with reasonable confidence. The current proposal includes additional layers of information, such as forecasts, reliability overlays,

	expected use of non-network solutions, and indicative pricing. The Authority has not demonstrated that these additional requirements will be sufficiently useful to access seekers, or that their benefits will justify the additional cost. These elements should be considered in later phases once there is evidence that the initial information is being used and delivering value.
Q4. Do you agree with our assessment of the outcomes that network visibility supports? If not, why not?	WEL agrees that network visibility can support better connection decisions, improved planning, and more efficient use of network capacity. However, we consider the Authority has overstated the extent to which the proposed information will change access seeker behaviour. In many cases, access seekers have limited ability to choose between locations or points of connection. Their site is often already determined before network capacity information is considered. Forecasting and non-network solution information should therefore be treated as separate later phases, rather than being bundled into the initial version of HV capacity mapping.
Q5. Do you consider the proposed amendments to Part 6 of the Code would promote the Authority's statutory objective? If not, why not?	WEL considers that HV capacity mapping, if appropriately scoped, could support the Authority's statutory objective by improving access to useful network information and supporting more efficient connection decisions. However, the proposed amendments go well beyond basic HV capacity mapping. WEL does not consider the Authority has provided adequate evidence that the additional requirements, including five-year forecasts, reliability mapping, non-network solution information, and indicative pricing, will deliver benefits to consumers that justify the additional cost and complexity.
Q6. Are there any matters you believe are missing from the proposed Code amendment? Please specify.	The proposal does not adequately address distributor access to LV metering data, particularly voltage performance data. This is relevant because many distributors have limited monitoring at distribution substation level, which makes it difficult to calculate distribution substation and feeder capacity with confidence. If future phases of network visibility are intended to consider distribution substation, feeder, or LV hosting capacity, access to suitable metering and

	voltage data will need to be addressed. Retrofitting monitoring devices across distribution substations would be costly and inefficient if suitable data can instead be made available from existing metering infrastructure.
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.	No. WEL considers the proposed timeframe is too short, particularly for distributors that are not already well advanced in developing network visibility tools. Time-pressured implementation risks producing tools that are costly, difficult to maintain, or based on low-confidence information. WEL considers a more realistic approach would be a minimum implementation period of 18 months from the later of finalisation of the Code amendment and finalisation of the supporting technical specifications. This would allow distributors to build to clear requirements, avoid rework, and reduce unnecessary implementation 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?	WEL agrees that detailed data requirements are more appropriately dealt with through technical specifications than through the Code itself. However, those specifications must be finalised before the implementation timeframe begins. It would be inefficient for distributors to start building or modifying systems without a clear and settled view of the information, accuracy, format, and update requirements that will apply
Q9. Do you consider that the proposal to develop network visibility specifications in consultation with interested parties would be effective? If not, why not?	Consultation will be important, but the process will only be effective if distributors have a strong role in developing the specifications. The specifications need to be grounded in what data distributors actually hold, the granularity of that data, and the level of accuracy that is genuinely required to provide benefit. Accuracy expectations are particularly important. A requirement for high-confidence capacity information would require a materially different level of data, modelling, assurance, and cost than a requirement for indicative planning information.
Q.10. Is the proposed timeframe for developing the specifications likely to be sufficient?	The proposed timeframe may be sufficient if the scope of the initial requirements is kept narrow and focused on current HV capacity mapping. However, if the specifications are expected to include non-network solutions, indicative pricing, reliability mapping, and five-year forecasting, WEL

	does not consider six months will be sufficient. Those elements introduce significant additional complexity and should be excluded from the initial phase.
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. WEL agrees that HV visibility is the logical place to start. It is more achievable than LV visibility and is more relevant to larger access seekers. However, this should not be presented as solving the main DER hosting capacity issues for most consumers. For most consumers, DER hosting capacity is primarily an LV network issue.
Q12. Do you agree with the assumptions the Authority has made? Why/Why not?	No. WEL considers the Authority's cost assumptions are too optimistic. While distributors understand their HV networks operationally and for planning purposes, converting that understanding into standardised, regularly updated, public-facing maps is not a small incremental task. It requires data preparation, modelling, governance, accuracy assurance, integration with GIS and other systems, publication processes, and ongoing support.
Q13. Have we correctly identified the benefits of network visibility?	The Authority has identified possible benefits of network visibility, but it has not demonstrated that those benefits will be material or widely realised. A key question is how many access seekers can genuinely choose between different locations or points of connection. If the group of access seekers that can use this information to materially change investment or connection decisions is small, the benefits may not justify the cost of the full proposal.
Q14. Do you have any information that might help quantify the value of these benefits? If so, please provide this information.	WEL does not have information that would quantify the benefits of the proposal as drafted. This is part of WEL's concern. The benefits appear to be asserted rather than quantified. Before imposing additional costs across all consumers, the Authority should provide a clearer assessment of the likely users of the information, the value they would derive from it, and the extent to which that value would exceed the cost of implementation and ongoing maintenance
Q15. Have we correctly identified the costs of network visibility?	No. WEL considers the costs of implementation have been understated.

	The proposal involves much more than simply publishing a map. It would require model development, data cleansing, data governance, accuracy assurance, GIS integration, publication processes, and ongoing update processes. Operationally, it also introduces a new layer of activity, including managing publication schedules, responding to user enquiries, maintaining caveats and methodology statements, and reconciling published information with other planning and disclosure material.
Q16. Do you have any information that might help quantify the costs? If so, please provide this information.	The cost of obtaining additional metering data required, if available, would be a material cost, even before developing the data ingestion pipeline, aggregation models, engineering capacity calculation models, GIS integration, and online publishing capability. The assumption that the proposal is low cost because some of the required information exists in some form is flawed. The material cost is in turning that information into a consistent, public-facing, repeatable, governed, and supportable process.
Q17. Have we correctly identified the regulatory overlaps?	The Authority has identified some areas of overlap, but WEL considers the practical impact of overlap has been understated. Even where datasets are technically different, they still need to be reconciled with asset management plans, information disclosures, connection information, planning information, and operational data. This reconciliation effort is not trivial, particularly where published information is updated on different cycles or prepared for different purposes.
Q18. Do you agree with our assessment that there is a net benefit notwithstanding any regulatory overlap? If not, why not?	No. WEL does not consider the Authority has demonstrated a net benefit. In the absence of quantified costs, quantified benefits, and evidence of likely use by access seekers, it is difficult to conclude that the proposed amendments will deliver a net benefit notwithstanding the additional regulatory overlap and compliance burden.
Q19. Do you have any information that might help quantify the costs and benefits	Not at this stage. However, WEL expects the overlap will create additional work through reconciliation of datasets, explanation of differences between published

associated with the regularly overlap? If so, please provide this information.	information sources, management of different update cycles, and the need to ensure that indicative planning information is not misinterpreted as a formal connection assessment.
Q20. Do you agree that the Authority should consider reducing the regulatory overlap as the proposed specifications are developed?	Yes. WEL supports reducing regulatory overlap wherever possible. However, this should be addressed before final Code amendments are confirmed, rather than left to be resolved after the obligation has been created. This would reduce the risk of unnecessary cost, duplication, and rework.
Q21. Do you agree with our assessment that there will be net benefit from the proposed amendments? If not, why not?	No, not as drafted. WEL supports the general direction of improving HV network visibility, but the proposed amendments are too broad. The Authority has not provided evidence that the additional requirements beyond basic capacity mapping will provide sufficient benefit to justify the cost and complexity of implementation
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.	WEL supports a more efficient staged approach. The preferred first step would be publication of current HV capacity mapping information, supported by clear technical specifications and appropriate caveats. Actual use by access seekers should then be assessed before deciding whether additional requirements, such as forecasts, reliability metrics, non-network solution information, or indicative pricing, would provide meaningful consumer benefit. This approach would better align with the Authority's statutory objective by delivering useful information at lower cost and with lower implementation risk.
Q23. Do you agree the Authority's proposed amendments comply with section 32 of the Electricity Industry Act?	WEL is not providing a legal view on section 32 compliance. However, from a policy perspective, where costs and benefits have not been quantified, it is difficult to see how the Authority can be confident that the proposal as drafted is the correct regulatory intervention. A narrower and more staged approach would be more proportionate and easier to justify.
Q24. Do you have any comments on the drafting of the proposed amendment?	WEL considers the drafting should be amended to reduce the scope of the initial obligation.

	In particular, requirements relating to five-year forecasts, reliability mapping, expected use of non-network solutions, and indicative pricing should either be removed from the initial Code amendment or moved to a separate workstream. The drafting should also make clear that published capacity information is indicative only and does not replace site-specific connection assessment.
Please indicate if you wish to be consulted during the development of the technical specifications supporting the proposed Code amendment.	Yes. WEL wishes to be consulted during development of the technical specifications, particularly on scope, staging, data accuracy, update frequency, LV metering data access, and the distinction between indicative public information and formal connection assessment