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The DGPPs should support a decentralised, competitive electricity system

SUPA Energy (SUPA) welcomes the opportunity to cross-submit on the Electricity Authority's "Improving information on high-voltage network capacity" consultation. We welcome the Authority's recent more frequent use of cross-submissions and consider this to be good regulatory practice.

Improved visibility is a key enabler for network utilisation as a service 'platform'

We welcome [ENA](#)'s commentary that "ENA agrees with and supports the fundamental premise of the Authority's paper – that EDBs should make high-voltage network capacity information available to network access seekers, and the public more generally." We similarly agree with [Vector](#) that "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."

Most of the EDB submissions made similar supportive comments.

SUPA also notes and agrees with the [ERGANZ](#) submission.

We agree with ERGANZ, in particular, that "Improving network visibility is a clear step towards a transparent, digitalised distribution system that supports competition, efficient investment and the reliable supply of electricity". SUPA would go a step further and emphasise the importance of improvements in network visibility for better and efficient utilisation of networks as service platforms. We [reiterate](#) that "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."

Decentralisation and the energy transition

SUPA considers that Vector has done a good job of placing the need for improved network visibility within the broader context of decentralisation, increased supply diversity and the energy transition: “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.”

Electricity distributors approach to network management is evolving and should be encouraged

The Electricity Authority should put good industry practices in the spotlight. There is a lot of progress in network visibility and asset management that SUPA thinks should be celebrated.

We find it encouraging that, as ENA point out, “many EDBs have already made network capacity and other information available, and an increasing number have projects actively underway to do so.” ENA cite Counties Energy, Northpower, WEL Networks and PowerNet as examples of EDBs that have recently launched capacity maps. Our submission also cited examples of good practice based on our experience and electricity distribution interaction.

We are also encouraged by comments made by electricity distributors such as [Waipā Networks](#), for example: “Waipā Networks has been on an ongoing journey to improve our capability in this space. We have created a full high-voltage network model, established a modern GIS platform, and we are in the process of improving high-voltage network data quality. This work is building the foundation for more efficient asset management planning internally and enabling the provision of customer-centric network information externally. Publishing a capacity map, or equivalent customer-facing visibility tool, is a natural extension of this work.”

Consistency over the large number of electricity distributors is vital

We cannot stress enough the importance of national consistency. The unfortunate reality is that the larger the number of electricity distributors the more difficult it is to achieve network consistency without regulation providing at a least minimum expectation or requirement for industry practices and performance.

We agree with ERGANZ that the Authority should “treat genuine national consistency as the central design goal, since the value of the proposal to members operating across all networks depends on comparable formats and common data standards rather than 29 divergent implementations”. We similarly agree with Vector that “There is maturity in high-voltage network information and increasing demand from access seekers to justify a common approach.”

The problems created by the large number of electricity distributors and network ‘platforms’ for the efficient operation of the electricity industry, and ensuring network visibility, need to be prominent in the policy development process.

We feel that the widely differing performance amongst EDBs and the large number of EDBs, particularly the very small EDBs, count against reliance on voluntary or more principles-based approaches. Reduced regulation is no solution to the costs of the large number of small EDBs in NZ yet is being pushed by some of the smaller EDBs.

ENA note there are a “range of [electricity distribution] businesses with differing levels of system capability, data maturity and integration”. We encourage ‘slower’ EDBs to learn from and follow faster movers in the industry.

Given the encouraging recognition of the benefits of improved network visibility and information disclosure by most EDBs, we found some of [Westpower](#) and [Network Tasman](#)’s commentary disappointing. We reject Westpower’s claims that “Small EDBs must be carved out” and “The case for regulation is weak”. The Westpower submission highlights the need for regulation by making it very clear they wouldn’t otherwise provide network visibility information dismissing it as not needed on the West Coast and being too expensive for Westpower to voluntarily produce. The Network Tasman submission mirrored Westpower’s commentary and is subject to the same criticisms.

We want to see ‘lowest common denominator’ EDBs ‘rise with the tide’ rather than constrain or limit network visibility reforms. We don’t think it is Vector’s intention but the suggestion that “The Authority should avoid imposing requirements that are more detailed than current data quality and systems capability can support” could be interpreted as indicating the poorest performing EDBs should serve as a handbrake or constraint on what network visibility requirements are introduced. If some EDBs have to lift their game more than others to comply that simply serves to reinforce the benefits of industry regulation.

One compromise we would be open to that might help smaller networks, is to require certain information be provided on request with very tight timeframes, rather than automatically published. It may be that this more personal approach to information requests is easier for some smaller networks than for larger networks. Access to the data to determine whether a site can connect is SUPA’s principal goal, rather than the process to get there.

Benefits of regulation are never uniform

We were surprised ENA pushed back against regulation on the basis that “the Authority has not demonstrated that the benefits of mandatory network visibility requirements, as proposed in the paper, will be realised uniformly across all networks.” We would not expect the benefits to be uniform and see this argument entirely as a red herring. SUPA cannot envisage any regulation having benefits that are uniform across all networks or why this would be seen as something that was desirable let alone necessary. As ENA acknowledge in the same sentence, “The distribution sector comprises EDBs with materially different network characteristics, connection activity and levels of demand from access seekers”.

Development of the network visibility requirements through collaboration could be useful

We encourage and would welcome the Authority and industry to engage in a more collaborative approach to the development and evolution of network visibility. We have made clear we are open to development of industry Codes and protocols.

We support Vector’s view that the proposals should “be supported by practical technical specifications developed collaboratively and transparently with distributors, access seekers, flexibility providers and other relevant parties.”

We also agree with Vector that “A collaborative process will ... reduce the risk of over-specification” and that “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.” A collaborative process would reduce the risk of under-specification or that some information access seekers may find useful could be omitted.

Much of the electricity distribution concerns about regulatory compliance and practicality could readily be addressed through tightly managed, collaborative processes, leveraging the information advantages industry participants have over regulatory agencies.

There is considerable opportunity for electricity distributors if they are so minded, e.g. through ENA, to collectively take the initiative and a pro-active lead in encouraging more consistent approaches to network operation, such as asset management and pricing.

Network visibility requirements should evolve and be extended over-time

SUPA agrees with Vector that “high-voltage visibility is a practical starting point” but “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.”

Consistent with Vector's commentary, [WEL Networks](#) notes that "the largest hosting capacity issues for most consumers sit at LV level, where the majority of ICPs connect".

Commerce Commission versus Electricity Authority

Both ENA and ERGANZ raise concerns about overlap between the Commerce Commission's existing regulatory requirements and the new requirements proposed as part of the Authority's consultation.

We agree with ENA it is encouraging to see a regulator undertake analysis of these overlaps but are sympathetic to their concern that "the Authority has underestimated the practical burden that can arise when EDBs are required to comply with multiple disclosure regimes that seek similar information for different purposes." We are also sympathetic to ENA's concern that "even where two disclosure requirements appear superficially similar, they may still require separate processes, systems, governance arrangements and quality assurance activities to support compliance" and "This can create unnecessary complexity and cost, while also increasing the risk of inconsistent information being presented to stakeholders."

This is an area EDBs should work through with both regulators to resolve in the most efficient and cost-effective way possible, to minimise unnecessary regulatory compliance costs and also to make it easier for users of disclosed information to navigate through different regulatory disclosures and requirements. Having the same information presented or updated in different ways to satisfy different regulatory requirements is of no benefit to anyone.

It may be that for some information the best approach will be for the Commerce Commission to amend its Part 4 Commerce Act Information Disclosure requirements if it avoids the need for additional Electricity Authority disclosure requirements. We are sympathetic with Vector's view that the Authority should consult "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."

We also agree with EGRANZ that the Authority should "reduce regulatory overlap with the Commerce Commission's information disclosure regime as the technical specifications are developed".

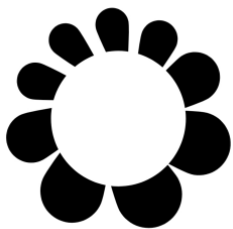
Concluding remarks

It is clear from both electricity distributor and access seeker submissions that there is near consensus recognition of the the benefits of improved network visibility.

Where there seems to be contention is electricity distributor (and Transpower) push back on the extent of regulation that should be adopted at this stage. The points SUPA would like to emphasis in this respect are:

- i. we think that the more industry cooperation and collaboration there is the more surety there will be that the information requirements will be beneficial (and, similarly, the lower the risk that useful information is omitted),
- ii. we would not want poorer performing EDBs to act as a handbrake on disclosure or network visibility,
- iii. similarly, the large number of EDBs, particularly the very small EDBs, counts against reliance on voluntary or more principles-based approaches,
- iv. the Authority should discount the 'regulatory compliance costs' of information that EDBs following best industry practices should be producing anyway, and
- v. we are sympathetic to concerns raised about unnecessary or inefficient compliance costs from having two parallel disclosure regimes operated by the Commerce Commission and the Electricity Authority and consider that this should be directly addressed – having the same information presented or updated in different ways to satisfy different regulatory requirements is of no benefit to anyone.

Yours sincerely,



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