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

Consultation — Improving information on high-voltage network capacity

Top Energy welcomes the opportunity to provide feedback on the Electricity Authority's consultation paper, Improving information on high-voltage network capacity.

Top Energy owns and operates the electricity distribution network serving the Far North region. our network is characterised by low load growth and limited distribution network constraints. We serve a predominantly rural and dispersed customer base across the Far North District.

We are supportive of the intent and direction of the proposal. Standardisation of network capacity information benefits customers, and we agree it will assist access seekers in their connection decisions. Top Energy is on an ongoing journey to improve our asset data, the customer experience, and customers' access to key network information.

We support the submission made by the Electricity Networks Association (ENA), with a number of specific concerns. Our detailed responses to each consultation question are set out in the attached submission form.

Our key concerns are summarised below.

- Case for intervention – the Authority has not demonstrated a sufficiently compelling case for regulatory intervention at this time, and existing voluntary, industry-led progress should be assessed first.
- Proportionality – a one-size-fits-all approach is inappropriate. An exemption mechanism for low-growth, unconstrained EDBs is needed so that costs remain proportionate to benefits.
- Costs and benefits – the costs of compliance have been underestimated, while the benefits on low-growth, unconstrained networks, and its customers, are likely to be limited.
- Implementation timeframe – implementation should not commence until the technical specifications are finalised, with sufficient implementation time allowed thereafter.
- SAIDI/SAIFI reporting – quarterly publication of rolling SAIDI/SAIFI figures risks conflicting with our audited Commerce Commission disclosures and misleading customers. These figures should be published annually, aligned with Schedule 10.

Please contact us if you would like to discuss any aspect of this submission.

Yours sincerely

[redacted]

Claire Picking
GM Network

Top Energy Ltd

Appendix B Submission form

Improving information on high-voltage network capacity

Submitter	Top Energy

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.	Partially, as the Authority has identified, most, not all, distributors have a good understanding of the topology and power flows on their networks. We agree with this statement that maturity and capability in the broader space varies, particularly in EDBs where constraints and growth are minimal, so power flow and hosting capacity tools are not fully embedded at the same level. Top Energy are on an ongoing asset information journey, which includes asset connectivity and visibility through our GIS and other asset data. We are working in the same direction, however the pace and form of that journey should be determined by the needs of our network and customers, not by regulation. The significant progress already occurring across the sector voluntarily demonstrates the sector is self-directing.
Q2. Do you agree the issues identified by the Authority are worthy of attention? If not, please explain why.	We agree that standardisation is beneficial, and should be developed. However there is little justification for the Authority's attention for low growth and unconstrained networks, where implementation costs will be passed onto consumers, for the benefit of a small subset of customers.
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?	No. We support ENA's submission that the Authority has not demonstrated a sufficiently compelling case for regulatory intervention at this time. If the Authority does proceed, Top Energy considers that a one-size-fits-all approach would be inappropriate. An exemption mechanism for EDBs with low connection activity and limited demand for network visibility information is essential to ensure costs remain proportionate to benefits. We have a well-established modern GIS platform, and a public facing tool showing where assets exist. We also continue to improve our asset data and have initiatives in place for continued development of capacity information as a natural extension, this is inline with many other EDB. However, we have concerns regarding the proposed timeframe for the change and feel it will bare a cost disproportionate to the needs of the business and its customers at this time.
Q4. Do you agree with our assessment of the outcomes that network visibility supports? If not, why not?	Top Energy supports the ENA submission on this question, we note that the benefits are focussed on a small subset of access seekers with location flexibility.
Q5. Do you consider the proposed amendments to Part 6 of the Code would promote the Authority's statutory objective? If not, why not?	We support ENA's submission and are not convinced the Authority has demonstrated that the proposed amendments are the most efficient means of achieving its objective.
Q6. Are there any matters you believe are missing from the proposed Code amendment? Please specify.	An exemption mechanism low growth / unconstrained EDBs is the key missing element.
Q7. Is the indicative timeframe for implementing the proposed Code amendment likely to be adequate? If not, please provide information	Top Energy is concerned that the implementation timeframe to deliver the required output will put undue

supporting a different timeframe, including identifying cost savings from a later implementation date.	costs onto networks, and consumers, which will see little benefit. Top energy supports the ENA submission that the implementation period commence only after the technical specification has been finalised with sufficient implementation time applied.
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?	Top Energy supports the ENA submission on this question. .
Q9. Do you consider that the proposal to develop network visibility specifications in consultation with interested parties would be effective? If not, why not?	Yes. Top Energy supports the ENA submission on this question and wishes to be involved in specification development.
Q.10. Is the proposed timeframe for developing the specifications likely to be sufficient?	Top Energy supports the ENA submission on this question. Appropriateness of the timeframe is dependant on scope and extent of stakeholder engagement.
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.	Partially. Top agrees that many EDBs have good HV data and SCADA/ADMS capabilities, making this a more appropriate place to start than the LV networks. Improving LV network information has the potential to be a timely and costly exercise and should be considered before moving into the LV expansion.
Q12. Do you agree with the assumptions the Authority has made? Why/Why not?	Not entirely. The Authority's assumption that costs will not be highly material is based on the view that underlying network data is already available to distributors, and easily accessible as a unified data set. While this may be true generally, the systems, processes, data governance arrangements, and publication tools required to comply with the proposed obligations do not already exist for Top Energy in the form required. The Authority acknowledges that there is limited information available to quantify the costs and benefits and then indictes that a qualitative evaluation has been completed using the limited information. We are concerned that this has been a whole system evaluation which does not represent some regoins situations. The Authority also appears to assume that access seekers will make meaningful use of published network information. Top Energy's experience is that connection decisions in our region are driven by property location, business needs, and other fixed factors — not by comparative analysis of network hosting capacity across different sites.
Q13. Have we correctly identified the benefits of network visibility?	Top Energy supports the ENA submission on this question. Benefits have been identified but their scale on low-growth, unconstrained networks is likely to be limited.
Q14. Do you have any information that might help quantify the value of these benefits? If so, please provide this information.	Top Energy does not have quantitative information. We support the ENA recommendation that the Authority assess actual user uptake from existing implementations before proceeding.
Q15. Have we correctly identified the costs of network visibility?	No. Top Energy supports the ENA submission on this question. Opportunity costs and the diversity of EDB capability have been materially underestimated.
Q16. Do you have any information that might help quantify the costs? If so, please provide this information.	Top Energy does not have detailed cost estimates at this time as technical specifications have not been developed.
Q17. Have we correctly identified the regulatory overlaps?	Broadly yes, but Top Energy considers the Authority has underestimated the practical burden of overlapping disclosure regimes. Even where information appears similar, different definitions, reporting periods, calculation methodologies, and assurance requirements mean that separate processes must be maintained.

Q18. Do you agree with our assessment that there is a net benefit notwithstanding any regulatory overlap? If not, why not?	No. Top Energy supports the ENA submission on this question. For a low-growth, unconstrained network, the costs are concrete and the benefits speculative. The SAIDI/SAIFI regulatory overlap issue (see Q17) compounds this concern.
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.	Individual EDBs will be better placed to provide evidence once specifications are available.
Q20. Do you agree that the Authority should consider reducing the regulatory overlap as the proposed specifications are developed?	Yes. Top Energy considers that regulatory overlap reduction should be a commitment, not merely a consideration to avoid confusion, unnecessary reporting and duplication.
Q21. Do you agree with our assessment that there will be net benefit from the proposed amendments? If not, why not?	No. The proposal goes beyond the requirements of most access seekers in order to make decisions and in our view does not provide network-wide benefits while adding additional costs that are born by the consumers.
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.	No. Existing voluntary industry-led progress should be assessed before mandatory obligations are imposed.
Q23. Do you agree the Authority's proposed amendments comply with section 32 of the Electricity Industry Act?	Top Energy supports the ENA submission on this question. The evidential basis for the intervention requires strengthening before the section 32 threshold is met.
Q24. Do you have any comments on the drafting of the proposed amendment?	A specific concern relates to the proposed requirement to publish SAIDI and SAIFI information quarterly. SAIDI/SAIFI results are subject to audit and validation following the close of the financial year and are calculated using the average number of ICPs over the full year. A rolling 12-month figure published quarterly would not align with established definitions and would risk producing results that conflict with, or appear inconsistent with, our audited information disclosure figures. This creates a material risk of misleading our customers, who are largely unfamiliar with SAIDI/SAIFI as concepts. Publishing two sets of what appear to be the same reliability figures, calculated differently and at different intervals, would undermine confidence in the data without delivering commensurate benefit. Top Energy considers that SAIDI/SAIFI information should be published annually, aligned with Schedule 10 of the Commerce Commission Information Disclosure Determination, to ensure consistency and avoid the risk of conflicting or misleading information.
Please indicate if you wish to be consulted during the development of the technical specifications supporting the proposed Code amendment.	Yes. Top Energy wishes to be consulted during the development of technical specifications, in particular to ensure specifications reflect the practical realities of operating a small, regional EDB, and that SAIDI/SAIFI publication requirements are aligned with existing Commerce Commission information disclosure frameworks.