Appendix B: Submission form for anticipatory capacity

Transmission Pricing Methodology amendments 2026

Please email your submission to networkpricing@ea.govt.nz by 5pm, 7 August 2026.

Submitter	Top Energy Limited

Chapter 5: Anticipatory capacity		
#	**Question**	**Response**
7	Has the Authority correctly described the nature and root cause of the cost-allocation issues for anticipatory connection assets? Please provide your reasons.	Yes
8	Do you agree with the proposal to require the use of the standard method to allocate the 50% share of capital cost of anticipatory connection assets that is to be recovered through benefit-based charges? Please give your reasons.	Yes, as identified in 5.14 to 5.16 investment could fundamentally change the power flows meaning historical flow are not a reasonable proxy for who benefits. Our evidence confirms your view on the Northland region highlighted. The standard method which considers including bespoke modelling of the net private benefit is appropriate.
9	Do you agree with the proposal that the requirement to use the standard method for allocating the cost of anticipatory capacity should progress ahead of Transpower's operational review of the benefit-based charging methods? Please state your reasons.	Yes, as the issues needs to be addressed now to ensure efficient investment.
10	Do you agree that the cost of anticipatory interconnection assets should be met by beneficiaries through the normal BBC allocation approach? Please explain your reasons.	Yes, however these should be based on the Standard method as per question 8.
11	Can you identify better options than those proposed by the Authority to allocate the cost of anticipatory assets? Why would your option be better?	Not under the current TPM framework. A review of the TPM framework could identify better options.
12	Do you have any comment on the drafting of the amendment to the treatment of anticipatory connection assets in Appendix C?	