

Appendix A Format for submissions

Further reform of distribution connection pricing – issues paper

Please email your submission to distribution.pricing@ea.govt.nz by 5pm, Monday 24 August 2026.

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Organisation	S&T WELLINGTON Ltd

Questions	Comments
Q1. Do you agree with the background and context summary above? Why, why not?	Agree. Consumers and developers confront issues set out in 2.19 (c) and (d), ongoing.
Q2. Is there additional background, evidence or context relevant to the issues covered in this paper?	Practice issues at the boundary between Distributor and network extensions abound. Distributors are invariably hands off and respond "not our responsibility"
Q3. How should the Authority prioritise across possible options identified in this paper?	Those that favour consumers for offtake connections
Q4. Which options should have the highest or lowest priority, and why?	Highest priority for options that favour consumers for offtake connections. Because of flagrant disregard for consumers by distributors. Next priority should be options that exploit the existing capacity without exceeding capacity.
Q5. Do you consider costing methodologies should be a priority for further reform, and do you have any evidence or analysis to support your view?	Yes. Client advised for a recent high density residential development, the distributor changed their position and insisted upon a transformer that clearly had capacity for other network needs as well as the client project. A capital contribution charge at 60% of cost was applied, the max, "because the code allows them to do so".
Q6. What are your views on the merits of the identified costing methodology options?	Option A6 recognises the distributors knowledge and expertise versus the offtake request which is more likely to be focussed upon an estimate of short term demand rather than the length of demand and associated (heating) impact on the distributors network.
Q7. Are there any other costing methodology options you think the Authority should consider?	Option for review and adjustment if offtake demand is lower than initially agreed.
Q8. Do you consider allocation methodologies should be a priority for further reform, and do you have any evidence or analysis to support your view?	Yes. The methodologies do not recognise the difference between the long term perspective of distributor and a range of terms for offtake connections that are mostly much shorter term.
Q9. How well do the identified allocation methodology options meet the allocation objectives discussed in this paper?	The allocation methodology options do not seem to meet the objectives to: (c) incentivise and optimise investment; or (d) access seeker investment is not deterred by excessive cost or risk

Questions

Q10. Are there any other allocation methodology options you think the Authority should consider?	There needs to be an option that reflects the term uncertainty of offtake connection. A commercial business for instance may close or move. The capacity at the connection may need to be reduced and released.
Q11. Are you aware of any issues relating to network development funding? Please provide examples, evidence or analysis where possible.	Unaware.
Q12. What options, if any, should the Authority consider for promoting efficient pricing for network development?	Consider option(s) for where distributor network development includes uncommitted capacity improvements in anticipation of reasonable forecasts.
Q13. Are you aware of any issues relating to network modification charges? Please provide examples, evidence or analysis where possible.	Unaware.
Q14. What options, if any, should the Authority consider for promoting efficient pricing for network modifications?	Options set out in Issues Paper paragraph 4.30.
Q15. Are you aware of any issues relating to connection downgrade or disconnection charges? Please provide examples, evidence or analysis where possible.	Yes. Financial collapse of a consumer led to a change of site owner, with a significantly lower power requirement. The distributor did not accept the owners professional advisor's request or the Retailer to downgrade and remove plant until fully islanded within an otherwise cleared site seven months later. ██ ██ ██
Q16. What options, if any, should the Authority consider for promoting efficient pricing for connection downgrades or disconnections?	Penalty for not downgrading within 30 calendar days of Consumer request; and Enforced reduction applicable from 30 days of date of request; and Liability of Distributor for all costs incurred by Consumer (if downgrade not implemented within 30 days of request)
Q17. Are you aware of any issues relating to continuance pricing? Please provide examples, evidence or analysis where possible.	Unaware.
Q18. Should continuance pricing methodologies be a priority for further reform? Please provide reasons for your view.	Methodologies need to encompass all aspects of electricity supply, including operational support of alternative (off-grid) solutions. Many Consumers are ill equipped for alternative (off-grid) solutions.
Q19. What options, if any, should the Authority consider for promoting efficient continuance pricing?	Extended useful life beyond design life and commercial life terms. Risks of interruption to supply and sharing of risk.
Q20. Are you aware of any issues relating to secondary network access? Please provide examples, evidence or analysis where possible.	Unaware

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Q21. Should secondary network access be a priority for further reform? Please provide reasons for your view.	No need for reform. Secondary network owners typically are hands off, see little value in cost recovery and would probably consider reform as over reach and an intrusion. Distributors do however need to recognise secondary networks are key to delivery of electricity to ICP consumers, and not (blindly) ignore secondary networks as now.
Q22. What options or approach, if any, should the Authority consider for addressing secondary network access issues?	The extent of secondary network access issues (if any) needs to be well defined before considering options or approach.
Q23. Are you aware of any issues relating to financial security requirements? Please provide examples, evidence or analysis where possible.	Expecting Consumer payment in advance for connection is abhorrent and counter to normal commercial terms. Payment required in advance is an abuse of market power.
Q24. Should financial security requirements be a priority for further reform? Please provide reasons for your view.	Priority to significantly lower, restructure to align with deliverables, or remove altogether for majority of new connections.
Q25. What options or approach, if any, should the Authority consider for financial security requirements?	Significantly lower, restructure to align with deliverables, or remove altogether, unless the connection involves investment in upstream plant remote from the connection but necessitated by the connection.
Q26. Do you have views on any other measures the Authority should put in place to address connection pricing methodology issues (including Appendix D issues relating to contestability, in-kind contributions, large connections, and real estate developments)?	No views or other measures to propose,
Q27. What measures, if any, should the Authority consider to ensure connection pricing methodology requirements are effective in practice?	Trial and benchmark across Distributors using recent past and present exemplars.
Q28. How should the Authority monitor, review or update connection pricing methodology requirements to ensure they remain fit for purpose over time?	Require an example case from each Distributor

