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.

Name	Haley Mortimer
Organisation	Z Energy Limited

Questions	Comments
Q1. Do you agree with the background and context summary above? Why, why not?	Yes. The paper appropriately identifies transport electrification, including EV charging, as a driver of distribution network growth.
Q2. Is there additional background, evidence or context relevant to the issues covered in this paper?	Z's views are based on our experience obtaining connections for EV charging at select Z sites. These generally fall into two categories: standard offtake connections assigned to a distributor consumer group or tariff; and larger, high-capacity or first-of-type connections that may be individually priced.
Q3. How should the Authority prioritise across possible options identified in this paper?	Z believes the Authority should prioritise reforms that improve consistency, predictability and transparency across distributors.
Q4. Which options should have the highest or lowest priority, and why?	Z believes the highest priority should be given to Options A1, A2, A4 and A5, together with standardisation of allocation methodologies and a prudent cost framework for large connections.
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, because cost predictability across multiple sites and distributors is important to investment decisions.
Q6. What are your views on the merits of the identified costing methodology options?	Z supports these options for the following reasons: Option A1 – Support that tariff calculations should be adjusted commensurately so high-capacity connections do not pay twice through both connection charges and ongoing lines charges. Option A2 & A4 – Support both as high priority, given they will provide budget certainty for large projects. Option A5 – Support as will likely improve network capacity and/or installing of infrastructure that later other customers can use.
Q7. Are there any other costing methodology options you think the Authority should consider?	The Authority could consider specific guidance for electrification-enabling investment, including public EV charging, given that the Authority has noted transport electrification as a network growth driver. Z would welcome the opportunity to provide feedback to the Authority on any draft guidance prepared in this regard.
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. New connections are a component of EV charger installation costs, and capacity-charge allocation has a bearing on those costs. Z believes the priority should be establishing a consistent process across distributors rather than prescribing one allocation method.

Questions	Comments
Q9. How well do the identified allocation methodology options meet the allocation objectives discussed in this paper?	Z supports standardisation in some form between distributor allocation methodologies. Z supports Option B4 to limit distributors' ability to increase shared costs for new customers and supports Option B5, but the definition of large connection must be clear and appropriate for this use case. Z also supports Option B9 in principle.
Q10. Are there any other allocation methodology options you think the Authority should consider?	Z believes the Authority should consider extending or strengthening pioneer-scheme-style cost reallocation for connection categories with high growth potential, such as charging corridors, where the first mover may otherwise pay disproportionately for capacity that later connections will also use.
Q11. Are you aware of any issues relating to network development funding? Please provide examples, evidence or analysis where possible.	Z believes a first-mover disadvantage can exist where a connection funds network capacity or infrastructure that later customers use. This can make an otherwise desirable EV charging investment uneconomic at the time it is proposed.
Q12. What options, if any, should the Authority consider for promoting efficient pricing for network development?	Z believes the Authority should consider transparent pioneer or cost-reallocation schemes that recognise future use of connection-funded network capacity. It should also ensure that network benefits created by a new connection are reflected in the calculation of incremental costs.
Q13. Are you aware of any issues relating to network modification charges? Please provide examples, evidence or analysis where possible.	No specific comments.
Q14. What options, if any, should the Authority consider for promoting efficient pricing for network modifications?	
Q15. Are you aware of any issues relating to connection downgrade or disconnection charges? Please provide examples, evidence or analysis where possible.	
Q16. What options, if any, should the Authority consider for promoting efficient pricing for connection downgrades or disconnections?	
Q17. Are you aware of any issues relating to continuance pricing? Please provide examples, evidence or analysis where possible.	
Q18. Should continuance pricing methodologies be a priority for further reform? Please provide reasons for your view.	
Q19. What options, if any, should the Authority consider for promoting efficient continuance pricing?	

Questions	Comments
Q20. Are you aware of any issues relating to secondary network access? Please provide examples, evidence or analysis where possible.	
Q21. Should secondary network access be a priority for further reform? Please provide reasons for your view.	
Q22. What options or approach, if any, should the Authority consider for addressing secondary network access issues?	
Q23. Are you aware of any issues relating to financial security requirements? Please provide examples, evidence or analysis where possible.	
Q24. Should financial security requirements be a priority for further reform? Please provide reasons for your view.	No specific comments.
Q25. What options or approach, if any, should the Authority consider for financial security requirements?	Z would support continued monitoring of these requirements, particularly for higher-cost or atypical connections. If this continues, the requirements themselves should be proportionate, transparent and supported by evidence.
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)?	Z supports requiring distributors to publish their methodology for setting network cost contributions for individually priced or large connections, and to provide clear guidance on when a connection is treated as large rather than assigned to a standard consumer group.
Q27. What measures, if any, should the Authority consider to ensure connection pricing methodology requirements are effective in practice?	No specific comments.
Q28. How should the Authority monitor, review or update connection pricing methodology requirements to ensure they remain fit for purpose over time?	No specific comments.