

CROSS-SUBMISSION

Further Reform of Distribution Connection Pricing

Submitted by Wulford Limited | 17 September 2026

Submission type	Cross-submission responding to published submissions
Relevant initiative	New Zealand Distributed Energy Infrastructure Initiative (NZDEII)
Publication	No objection to publication in full
Contact	Wulford Limited - contact details provided with submission email

1. Purpose and scope

Wulford Limited provides this cross-submission from an infrastructure development, project formation and delivery perspective. Through NZDEII, Wulford has a particular interest in how electricity connection and capacity arrangements can support housing, business investment and wider economic growth. Our comments respond primarily to the published submissions of Fletcher Residential, Property Council New Zealand, Vector, Powerco and Electricity Networks Aotearoa, and focus on one practical question:

Do current and emerging connection-pricing and connection-process settings provide a practical pathway for credible alternative capacity options to be identified, developed and assessed?

2. What the submissions collectively reveal

Wulford agrees with the developer-side submissions that applicants need greater visibility of connection costs, wider network implications and credible alternative options. We also agree with distributor-side submissions that any further intervention should preserve distributor technical authority, allocate risk appropriately and be evidence-based.

ACCESS SEEKERS / DEVELOPERS	DISTRIBUTORS
Fletcher Residential; Property Council New Zealand	Vector; Powerco; Electricity Networks Aotearoa
• Connection-cost transparency and predictability • Wider network development and first-mover exposure • Visibility of credible alternative options	• Network safety and reliability • Technical and performance risk allocation • Evidence before prescriptive intervention

Taken together, these positions expose a narrower implementation question: do the combined pricing and connection-process settings provide a practical route from better information to an assessable alternative, without weakening distributor technical authority?

Greater transparency can improve understanding of a proposed connection and its cost. Delivery contestability can improve choice over who designs, supplies or constructs an already-defined solution. Neither necessarily answers an earlier question:

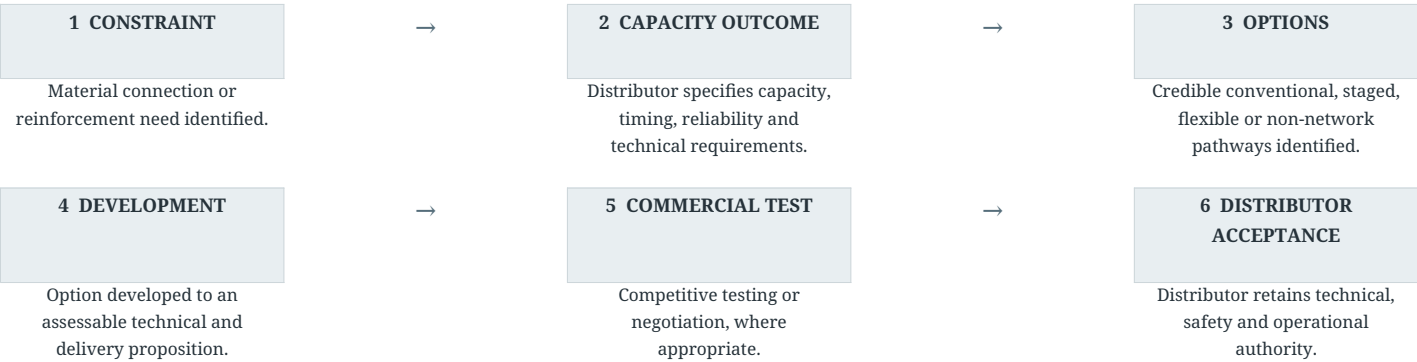
What capacity outcome is actually required, and could that outcome credibly be delivered in another way?

This matters particularly where a connection triggers material upstream reinforcement, demand emerges progressively, infrastructure will serve future users as well as the immediate applicant, or staged, flexible or non-network resources may credibly defer or complement conventional investment.

The objective is technology-neutral: credible pathways should not be unintentionally foreclosed before material expenditure is effectively committed.

3. A practical capacity-options pathway

The relevant question is whether current and emerging settings allow the required capacity outcome to be defined clearly enough for more than one technically credible pathway to be developed and assessed. This should be considered alongside the Electricity Industry Participation Code (Network Connections) Amendment 2026, including new load-connection processes, the network-connections pipeline and information/confidentiality settings; the load-connection provisions commence on 1 June 2027.



3.1 Conditions required for workable investigation

A. Sufficient information	B. Practical ability to develop
capacity requirement underlying assumptions technical parameters Testing should examine whether access seekers can obtain sufficient non-confidential information to develop a credible alternative meaningfully. This need not require disclosure of commercially or security-sensitive information.	capable support distributor retains technical authority Testing should examine whether existing processes allow access seekers to engage appropriately capable support where multiple parties must be coordinated. This does not transfer authority over network standards, safety or system operation.

3.2 The core distinction

INFORMATION	OPTION DEVELOPMENT	CONTESTABILITY
reveals the constraint	makes a credible alternative assessable	can improve delivery choice

Competition at the construction stage does not, by itself, create competition between infrastructure solutions.

The neutral test is which credible option, or combination of options, can meet the required technical and reliability outcome at efficient whole-of-system cost on a comparable basis, with appropriate allocation of delivery and performance risk. In many cases conventional reinforcement will remain the efficient answer.

4. Recommendations

Wulford does not suggest that the Authority establish a new capacity-procurement or formation regime. The immediate decision is narrower: whether current and emerging pricing and connection-process settings should be tested together to determine whether a practical implementation gap remains.

PRIMARY RECOMMENDATION

The Authority should retain this issue for further analysis and test, through one or more structured worked cases, whether current and emerging connection-pricing and connection-process settings provide a practical basis for credible alternative capacity pathways to be identified, developed and assessed before determining whether any further intervention is warranted.

4.1 Test neutrality of connection-pricing settings

Test whether current connection-pricing settings are neutral between technically credible pathways and do not unintentionally favour a particular delivery or financing structure. The assessment should remain technology-neutral and consistent with efficient cost allocation.

4.2 Test workability of connection-process settings

For sufficiently material growth-related connections, test whether the capacity outcome can be expressed clearly enough - including timing, reliability, security and technical performance - for credible alternatives to be developed and assessed; whether access seekers can obtain sufficient non-confidential information under current and emerging settings; and whether existing processes allow them to engage appropriately capable support where required. None of these tests changes the distributor's technical authority.

4.3 Test the interface through structured worked cases

Use one or more structured worked cases, based on live or recent growth-related connection scenarios where practicable, to test how pricing and connection-process settings operate together. The purpose is not to determine in advance that the issue belongs within connection pricing, but to ensure that any implementation gap is not lost between adjacent work programmes.

The most useful worked cases would test both a material pricing issue and a practical connection-process issue, particularly where:

- the connection involves material upstream reinforcement;
- demand is expected to emerge progressively;
- the investment may provide capacity beyond the immediate applicant; and
- a credible alternative pathway can be identified and compared using sufficient non-confidential information.

Wulford has identified potential worked-case profiles from published network planning material and would be available to provide a worked case separately, subject to current-data validation and engagement with the relevant distributor and access seeker.

Testing should examine:

- whether the required capacity outcome can be specified sufficiently clearly;
- whether current and emerging information and connection-process settings are sufficient for credible alternatives to be developed;
- whether materially different credible options emerge and can be compared on a reasonably equivalent basis;
- how availability, technical, delivery and performance risks would be allocated;
- whether applicants face disproportionate cost or delay;
- whether current connection-pricing settings create unintended barriers; and
- whether structured desktop testing justifies further live-case engagement.

The purpose of testing would be to establish evidence, not to prejudge a regulatory response. It would also test whether the new and emerging Network Connections settings, together with connection-pricing reform, are sufficient in practice, and help the Authority determine whether any residual issue is best addressed through connection pricing, the Network Connections work programme, future competition-for-works work, industry guidance, or no further intervention.

5. Conclusion

The issue is whether current and emerging pricing and connection-process settings, taken together, provide a practical basis for more than one technically credible pathway to be developed and assessed before a material connection solution is effectively fixed.

For that question to be meaningful, an access seeker needs sufficient information to understand the capacity requirement and a practical ability to develop a credible alternative for distributor assessment. Neither changes the distributor's technical authority or responsibility for network performance.

Wulford considers this issue warrants practical testing. Structured worked cases could test whether current and emerging pricing and connection-process settings operate coherently in practice while preserving technology neutrality, appropriate risk allocation and distributor technical authority. This would support the Authority's objective of efficient connection growth and network investment without prejudging the efficient asset or delivery model.

Wulford would be available to provide a worked example should the Authority consider that useful to its further analysis.

References

- Fletcher Residential - published submission on Further Reform of Distribution Connection Pricing
- Property Council New Zealand - published submission on Further Reform of Distribution Connection Pricing
- Vector; Powerco; Electricity Networks Aotearoa - published submissions on Further Reform of Distribution Connection Pricing
- Electricity Authority - Electricity Industry Participation Code (Network Connections) Amendment 2026 (load-connection provisions commence 1 June 2027)

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