

Appendix B Format for submissions: Integrating hosting capacity into small scale distributed generation connections – sunset clause

Submitter: Wellington Electricity Lines Limited (WELL)

Part6hosting.Submissions@ea.govt.nz

Question	Response
<p>Q1. Do you agree with the proposal to add an end date to the Code amendment previously consulted upon by the Authority, as described in this section? If not, why not?</p>	<p>WELL agrees with the proposal to add a five year end date.</p> <p>WELL agrees with the Authority’s reasons that technology is changing quickly and that standards relating to new technology needs to be reviewed to ensure it remains fit for purpose.</p> <p>WELL encourages the EA to continue to strike the balance between legislation (Codes) setting terms which are difficult to change and expected outcome standards that allow flexibility with the pace of technological development through evolving Standards (which target compliance with the output standard of the legislation). This would alleviate redrafting of “hard-coded” legislation settings and defer this detail to Standards which evolve with technology, but still meet minimum Code targets.</p>
<p>Q2. Do you agree the additional proposed amendment is preferable to the other option? 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.</p>	<p>WELL agrees with the Authority’s reasons that fixed regulation is inappropriate during times of rapid technology development.</p> <p>WELL agrees that an end date is preferable to a review date as an end date provides a stronger mechanism to ensuring the standards are re-examined to ensure they are fit for purpose.</p>

<p>Q3. Are there any other options that you consider a preferable to the options discussed? If so, please provide details.</p>	<p>The legislation is aimed at individual installations, however some consideration may need to be applied to cumulative effects, where individually the problem is not seen, but collectively (networked), customers may experience a detrimental effect. This will be managed by distributors having the ability to dynamically alter their operational settings so all customers continue to receive a reliable high quality supply rather than through a static (set and forget) approach.</p>
<p>Q4. Do you agree the Authority's proposed amendment complies with section 32(1) of the Act? If you don't agree, please explain your reasons.</p>	<p>WELL agrees.</p>
<p>Q5. Do you agree with the drafting of the proposed amendment? If not, why not?</p>	<p>WELL agrees.</p>