

Dear Network Pricing and Network Policy teams,

Thank you for the opportunity to provide a technical submission on the draft code amendment. The key amendment we wish to submit on is the minimum scheme definition.

Minimum scheme definition.

In the revised draft code the term *good electricity industry practice* has been replaced with *the distributor's connection and operation standards*. If this only applies to security and firmness of capacity that could be an effective definition. However, on the current construction the definition reads that *the distributor's connection and operation standards* also more generally applies to the *least-cost solution*.

As a company that seeks connections across the Motu we are starting to see the green shoots of effective and innovative connection offers that significantly lower the connection costs and provide security of supply for existing and future customers, however this is isolated and difficult to encourage across independent EDBs.

Connectors across New Zealand face widely disparate *least-cost* solutions based on EDB preference, in many instances without articulated technical merit or rationale. The inclusion of the wording *good electricity industry practice* would enable connectors to prompt laggard EDBs to adopt the increasing number of practiced and available *least-cost* solution frameworks from other EDBs, as those practices in other regions could be included within the definition of good electricity industry practice. The *good electricity industry practice* definition inherently protects EDB's network specific constraints as it already takes into account as the relative size, duty, age and technological status of the Network.

A regression to *the distributor's connection and operation standards* removes a prompt for EDBs to be encouraged to innovate for the benefit of the customer. We submit that the wording *good electricity industry practice* be reinstated, EDBs are protected by the definitions and connectors are afforded the possibility of change.

We appreciate the continued work by the EA to enable prompt and effective connections for all New Zealanders.

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