Appendix A Format for submissions

Submitter	SEANZ – Gareth Williams, Manager Innovation Pathways

Questions	Comments
Q1. Do you agree with the explanation of the distribution system operator (DSO) role/ entity, and the explanation of the distribution system operation (DSO) functions that one or more DSO entities would be required to perform?	Yes
Q2. Do you think we are correct that the themes we identified in submissions to the initial consultation paper mean we should focus mostly on system operation at the distribution level, and on the new functions required for effective distribution system operation?	Yes, this makes sense
Q3. Do you think we have accurately covered the main changes to the distribution system in this section? If not, what have we missed or where have we gone wrong?	Given the complexity of systems needed at distribution level, it raises the question as to whether having 29 EDB's of varying sizes is efficient in the energy transition. Section 4 also seems to be making assumptions as to the nature of systems needed. For example requiring device level / inverter level control standards is assuming that DSO's have direct communication with devices – which may not be the most effective option i.e. cloud based messaging standards may be sufficient
Q4. Do you agree with how we have defined the problem, as the need for a more coordinated framework of integrated system operation?	Agree very strongly. The potential for inconsistent, bespoke silo's are a real possibility without an overarching architecture. To date all we have seen are numerous pilot projects from various EDB's which in SEANZ view have not significantly

	advanced application of DER to solve problems. A centralised architecture and roadmap is needed to make timely progress.
Q5. In your view, what aspects of the Australian and British deliberations around DSO models are relevant to New Zealand?	Given the issues being considered are the same then yes, deliberations of these markets are relevant. Of note is that Australia has 16 EDB's, UK has 14 and NZ has 29 - in a much smaller population., Therefore achieving progress in NZ may be more difficult and costly without some level of consolidation (even if this is just at DSO level)
Q6. What do you think about the direction of research conducted in New Zealand by bodies such as the ENA, NEG and SIDG on the challenges of preparing to perform DSO functions?	They should provide input into the architecture and roadmap, potentially reducing the time and effort needed
Q7. What is your view about the need for an independent DSO (iDSO)? Should we consider an iDSO now as an option to perform all DSO functions, or a subset of functions related to market facilitation? Or can that decision wait until the market for flexibility services is more developed?	It should be considered now given again the challenge of 29 EDB's, many without the scale to efficiently establish as a DSO
Q8. What do you think about the three DSO models proposed by the Authority?	These seem appropriate options to consider
Q9. Do you prefer one model over the others?	Not at this stage – they need to go through a detailed analysis
Q10. Given the hybrid model can take several forms, what do you think would be the best allocation of DSO functions between the TSO and one or more distributors as DSOs?	No view at this stage
Q11. How would you rank the DSO models in terms of enabling the process of price discovery in the market for flexibility services to approach the wholesale market ideal of security-constrained economic dispatch?	No view at this stage