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Electricity Authority

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**RE: Exploring network visibility – Consultation paper**

Counties Energy welcomes the opportunity to respond to the Electricity Authority's discussion paper *Exploring Network Visibility: Costs, Benefits and Value*.

We agree that improved network visibility will play an important role in enabling New Zealand's transition to a low-carbon future with greater uptake of distributed energy resources, electric vehicles, and flexible demand. However, the form of information Access Seekers require is not well aligned with the static disclosures currently produced under existing regulatory frameworks.

In our view, the real value for Access Seekers lies in scenario modelling and interactive tools that enable them to test options quickly and with reasonable accuracy, rather than in static disclosures. Distributors hold the raw operational data necessary to underpin these tools, but it requires significant processing, validation, and contextualisation to deliver reliable insights. This comes with costs, specialist resourcing requirements, and a need for ongoing maintenance.

Counties Energy is investing in this area, with near-term priorities focused on high-voltage and medium-voltage capacity mapping where data quality is strongest. Low-voltage visibility will follow as smart meter data access and connectivity mapping improve. Recent progress with smart meter data has already demonstrated significant value, and we support further steps to expand and standardise access across the industry.

We support an approach that begins with industry-led guidance and standards, allowing innovation and flexibility, with regulatory intervention only as a backstop where progress stalls. A phased roll-out that prioritises high-voltage visibility is most appropriate for New Zealand's current context.

International experience, including from the United Kingdom and Australia, highlights the importance of balancing transparency with appropriate context, ensuring accuracy through phased deployment, and linking network



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visibility with flexibility markets. These lessons should be adapted for New Zealand conditions.

In summary, Counties Energy supports a measured and collaborative approach that builds trust in new tools, balances costs and benefits, and prioritises initiatives that deliver meaningful value to Access Seekers and consumers.

Yours sincerely

Astad Kapadia  
Head of DSO Strategy

# Annex – Response to questions

Questions	CEL Comments
Q1. Are you aware of the extent of the information currently being provided by distributors (including through disclosures)?	As a distributor, Counties Energy does not consider itself the most appropriate party to comment on the usefulness of disclosure information, as this is best answered by Access Seekers. To the best of our knowledge, however, we have not observed Access Seekers making significant use of publicly available disclosure information in their decision-making. In practice, network connection and upgrade discussions are handled as a joint discovery process between Counties Energy and the Access Seeker.
Q2. How do current distributor disclosures support your understanding of available capacity, constraints and opportunities on: a) high-voltage networks? b) low-voltage networks?	Counties Energy does not believe that current disclosure requirements contribute meaningfully to Access Seekers' understanding of available capacity, constraints, or opportunities at either the high-voltage or low-voltage levels.
Q3. How are you making use of existing disclosures to support more efficient outcomes?	In our experience, Access Seekers do not rely on existing disclosure information to support their decision-making. This is understandable, as the disclosures do not provide information in a form that is sufficiently contextualised to enable informed choices.
Q4. Would changes to the type of data, format, regularity or granularity of distributor disclosures better support decision-making? Please provide detail	Counties Energy's view is that distributor disclosures serve a different purpose from what Access Seekers require. The type of information Access Seekers are seeking includes available capacity at various levels of the network, the location and value of congestion zones, and reliability performance by area. Distributors hold raw data (such as voltage, current, power flows,

	<p>and harmonics), but this must be validated, processed, and integrated with other datasets (network connectivity models) before it can be converted into the insights Access Seekers are seeking.</p> <p>At present, these insights are generated manually for customers and are often based on industry rules of thumb, which introduces inefficiencies. As new tools and analytics platforms become available, distributors are moving towards more data-driven decision-making, but these outputs still require manual validation to ensure confidence and trust in the results.</p>
Q5. What other disclosures of network information would further inform your choices and decisions?	<p>Counties Energy considers that Access Seeker requirements are not best met through static disclosures. Disclosures provide a snapshot of conditions at a point in time, whereas Access Seekers typically want the ability to test scenarios quickly and with reasonable accuracy. For example, a disclosure showing 2 MVA of available feeder capacity could be interpreted very differently by a solar farm developer and an EV charging operator. Without context, such data risks misinterpretation and poor investment decisions.</p> <p>What Access Seekers value most is the ability to perform rapid scenario modelling, rather than the publication of additional static disclosure information.</p>
Q6. What are distributors' perspectives on the value of collating and publishing network capacity information for their own businesses?	<p>Within Counties Energy, network capacity information is valuable but used in a targeted way. It supports our network planners and connections engineers in evaluating new connections and in planning reinforcement projects. Its value lies in</p>

	operational use rather than as a broad disclosure mechanism.
Q7. What are distributors' perspectives on how well interested parties are using the data they already publish?	It is our view that interested parties, particularly Access Seekers, are not using existing disclosure data to assess their requirements. The information currently available is not suited to that purpose, which is why Access Seekers continue to rely on direct engagement with Counties Energy planners and engineers.
Q8. What are your perspectives on recent developments on access to smart meter data?	Counties Energy has had access to limited smart meter consumption data for the past five to six years, and we have found it to be an invaluable tool for network optimisation. Broader access to smart meter data for distributors, customers, and third parties would provide a more accurate understanding of consumption patterns and could help unlock greater utilisation of existing infrastructure. We strongly support initiatives that expand and standardise access to this data.
Q9. Is the pace of distributor progress on developing the capability needed to support work on improving network visibility appropriate? If not, what are your expectations regarding timeframes?	<p>We suspect that Access Seekers are dissatisfied with the pace of progress, as their expectation is for quick, automated answers to complex queries. From the distributor's perspective, these assessments take time to investigate and validate.</p> <p>Counties Energy is actively progressing the development of HV and MV capacity maps within the next one to two years, as the quality of monitoring data and connectivity information is already relatively high. Low-voltage mapping will follow, but progress is constrained by poor connectivity data quality. We are investigating the use of</p>

	smart meter data algorithms to improve LV network mapping and confidence levels.
Q10. What are the barriers and costs to distributors in developing the capability needed to support work on improving network visibility faster?	<p>The key barrier to accelerating capability development is the cost-benefit case. Providing high-level estimates for customers is currently a free service but comes at a cost to the distributor. Although self-service capacity maps could reduce the number of queries handled manually, the upfront investment in infrastructure, software, and skilled personnel is significant, and ongoing maintenance also carries substantial costs.</p> <p>In practice, many Access Seekers also prefer direct engagement with Counties Energy, further complicating the case for accelerated investment in self-service capability.</p>
Q11. Do you agree that distributors having a better understanding of network capacity/constraints and publishing this information in an easily accessible way is in the long-term interest of consumers?	Counties Energy agrees that a deeper understanding of network capacity and constraints is in the long-term interest of consumers. However, publishing this information without appropriate context may not achieve the intended benefit, as Access Seekers may misinterpret or misapply the data. Engagement with the distributor will remain essential.
Q12. Do you consider that there is a case for further regulatory intervention to further improve progress and the quality (e.g. timeliness, granularity, format standardisation) of disclosures that improve network visibility?	We believe there is a case for improving the usefulness of network visibility disclosures. However, this should be pursued collaboratively with industry to ensure that the outputs are genuinely fit for purpose, proportionate, and supported by demonstrable demand. Regulatory intervention may be necessary in time, but only once these foundations are in place.
Q13. Do you consider that measures are needed to improve awareness of and	Improving awareness of existing disclosures would not resolve the underlying issue,

encourage use of network visibility disclosures by interested parties?	which is that the information currently available does not align with Access Seeker requirements. In our view, the focus should instead be on developing new tools and processes that directly address those needs.
Q14. If further work is required to support the development and use of network visibility, which approach do you prefer: a) developing industry guidance or standards. b) introducing a regulatory backstop that would codify the industry guidance or standards. c) developing regulatory standards and timeframes for improving network visibility. d) Something else.	Counties Energy supports an approach that begins with industry guidance or standards developed collaboratively. This would allow for flexibility and industry learning, with the option of a regulatory backstop if progress stalls. Prescriptive regulatory standards and timeframes should only be considered if there is clear evidence of enduring barriers to progress.
Q15. Do you support an approach that focuses on high-voltage networks first, or do you have another preference?	We support a phased approach that prioritises visibility at the medium voltage (incl. distribution transformers) followed by high-voltage level. Medium and High-voltage networks are better understood and monitored, meaning that benefits can be realised more quickly. Low-voltage visibility should follow once data quality and connectivity mapping improves.
Q16. What other aspects of international developments relating to network visibility should we be looking at for lessons that could be considered in the New Zealand context?	Internationally, examples from the United Kingdom and Australia provide useful lessons. In the UK, distributors such as UK Power Networks have developed public hosting capacity maps and linked them to flexibility markets. In Australia, networks such as Ausgrid and SA Power Networks have pursued similar initiatives. Key lessons include the importance of building trust in data-driven tools through phased deployment, balancing transparency with appropriate context to avoid misinterpretation, and setting realistic expectations about accuracy and timeframes.

<p>Q17. Do you consider that metering equipment providers should be required to publish schedules of available data and prices to improve transparency and reduce transaction costs?</p>	<p>Counties Energy strongly supports this proposal. We have benefited significantly from access to consumption data in our region, and we believe that greater transparency from metering equipment providers would provide similar benefits to other distributors and Access Seekers. Publishing schedules of available data and prices would improve transparency, reduce transaction costs, and unlock greater value from the metering infrastructure.</p>
<p>Q18. Do you consider that elements of elements of Part 12A of the Code relating to default distributor agreements should be reinforced or extended to ensure consistent access to both consumption data and other types of data e.g. power quality from smart meters or other devices (such as inverters)</p>	<p>We support extending the principles of Part 12A to ensure consistent access not only to consumption data but also to other data types such as voltage, harmonics, and power quality information from smart meters and inverters. Consistency in access will enable a more complete picture of network performance and provide significant benefits for planning, optimisation, and consumer outcomes.</p>