Appendix E Format for Feedback

Exploring network visibility: costs, benefits and value

Submitter	NZ Clean Energy
What is your interest in network visibility?	Utility scale generation

Questions	Comments
Q1. Are you aware of the extent of the information currently being provided by distributors (including through disclosures)?	Yes
Q2. How do current distributor disclosures support your understanding of available capacity, constraints and opportunities on: a) high-voltage networks? b) low-voltage networks?	Some EDB's produce helpful data such as Powerco, this needs to be replicated over all EDB's. Low voltage is not relevant to our business.
Q3. How are you making use of existing disclosures to support more efficient outcomes?	Helps with site selection for potential solar farm and BESS locations by identifying suitable locations with appropriate capacity for additional DG.
Q4. Would changes to the type of data, format, regularity or granularity of distributor disclosures better support decision-making? Please provide detail.	Yes, more detail on future upgrade plans, and the future timing of these upgrades would help significantly as we could time development of solar farm sites with additional capacity coming on line via EDB asset upgrades in particular locations.
Q5. What other disclosures of network information would further inform your choices and decisions?	Specific info on substation layout (although this will be already available to the EDB approved suppliers). More detailed info on DG applications, the location, size, technology, party involved, timeframes including expected energisation date.
Q6. What are distributors' perspectives on the value of collating and publishing network capacity information for their own businesses?	N/A
Q7. What are distributors' perspectives on how well interested	N/A

parties are using the data they already publish?	
Q8. What are your perspectives on recent developments on access to smart meter data?	N/A
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?	The faster the better from our perspective and standardisation of the required info nationwide.
Q10. What are the barriers and costs to distributors in developing the capability needed to support work on improving network visibility faster?	N/A
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?	Yes absolutely
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?	Yes absolutely
Q13. Do you consider that measures are needed to improve awareness of and encourage use of network visibility disclosures by interested parties?	Yes absolutely
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	C

the industry guidance or standards. c) developing regulatory standards and timeframes for improving network visibility. d) something else.	
Q15. Do you support an approach that focuses on high-voltage networks first, or do you have another preference?	Yes, this would enable more generation and greater have flow on benefits to consumers and the economy.
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?	No comment
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?	Theoretically but I see this as complicated and against free market principals so unlikely to be workable in practice.
Q18. Do you consider that 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)?	No comment