

Appendix E Format for Feedback

Exploring network visibility: costs, benefits and value

Submitter	Orion NZ Ltd 10 October 2025
What is your interest in network visibility?	Electricity Distribution Business

Questions	Comments
Q1. Are you aware of the extent of the information currently being provided by distributors (including through disclosures)?	<u>Yes</u> / No
Q2. How do current distributor disclosures support your understanding of available capacity, constraints and opportunities on: a) high-voltage networks? b) low-voltage networks?	ID12A – Zone Substations
Q3. How are you making use of existing disclosures to support more efficient outcomes?	N/A
Q4. Would changes to the type of data, format, regularity or granularity of distributor disclosures better support decision-making? Please provide detail.	Yes – additional visual context and granularity down to lower network levels to customer understanding of network congestion Any disclosures are currently at a single point in time (updated annually) and limited to constraints at peak. Updating these at a higher frequency would provide more timely information for customers.
Q5. What other disclosures of network information would further inform your choices and decisions?	N/A
Q6. What are distributors' perspectives on the value of collating and publishing network capacity information for their own businesses?	Low voltage congestion maps will assist Connections Teams with customer enquiries and connection requests Identification of areas where non-traditional solutions may be applicable on a more regular basis rather than ad hoc assessments.

Q7. What are distributors' perspectives on how well interested parties are using the data they already publish?	Anecdotally, utility-scale distributed generators use the existing disclosures for identifying potential areas for development.
Q8. What are your perspectives on recent developments on access to smart meter data?	Refer to Orion's submission on EA's Future System Operation consultation.
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?	N/A
Q10. What are the barriers and costs to distributors in developing the capability needed to support work on improving network visibility faster?	Ongoing operational costs, Meter Equipment Provider maturity, Regulatory allowances and resources, Standard guidelines around smart meter data privacy / terms of use
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
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?	Information Disclosures for Asset Management Plans should be reviewed with new context Refer to Orion's submission on EA Our Future is Digital consultation for further details on data standardisation & centralisation
Q13. Do you consider that measures are needed to improve awareness of and encourage use of network visibility disclosures by interested parties?	No measures required but introduction of disclosures should be communicated to interested parties
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.	Orion prefers approach (a), developing industry guidance or standards, to support the development and use of network visibility

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.	
Q15. Do you support an approach that focuses on high-voltage networks first, or do you have another preference?	Yes, we think focusing on high-voltage networks first this provides the highest overall customer benefit
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?	Lessons from Australia's approach to Network Visibility with regards to smart meter roll-out and Power Quality data access is worth considering in the New Zealand context.
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?	Yes
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)?	The process for requesting access to consumption data provided under the DDA is not consistent or robust amongst retailer(s). Even when distributors request approval under the bespoke data agreement, responses are inconsistent (e.g. retailer(s) respond and allow or retailer(s) respond and disallow or retailer(s) do not respond). We would like to ensure that data does not need to be procured multiple times for different purposes due to terms of different agreements to improve the efficiency with data procurement and use.