Appendix E Format for Feedback

Exploring network visibility: costs, benefits and value

Submitter	SEANZ – Gareth Williams, Manager Innovation Pathways
What is your interest in network visibility?	Allowing installers and developers of distributed energy systems (residential, commercial and solar farms) have improved information to support design and investment decisions

Questions	Comments
Q1. Are you aware of the extent of the information currently being provided by distributors (including through disclosures)?	No (Highly variable between EDB's so difficult to know what is and isn't available)
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 networks have capacity maps at the HV level which support solar developers. Additional information such as voltage data would be useful but not available Information at LV is very limited. Some networks have text lists of areas of the network with export constraint issues but are difficult to find and apply. One or two networks (e.g. Unison) are now publishing maps of areas where flexibility solutions would be of value – this is a positive move.
Q3. How are you making use of existing disclosures to support more efficient outcomes?	Of limited value currently
Q4. Would changes to the type of data, format, regularity or granularity of distributor disclosures better support decision-making? Please provide detail.	At a minimum level, an address (ICP) searchable map showing areas with potential export or connection constraints should be available *(Methodologies for defining constraints should also be defined and consistent across EDB's based on proper analysis – but this issue is beyond this consultation)*
Q5. What other disclosures of network information would further inform your choices and decisions?	A map defining geographic areas where growth is requiring network upgrades should be published. *(This needs to be accompanied by requirements / incentives for EDB's to consider flexibility solutions – but this also beyond the scope of this consultation)*
Q6. What are distributors' perspectives on the value of collating	No view

and publishing network capacity information for their own businesses?	
Q7. What are distributors' perspectives on how well interested parties are using the data they already publish?	No view
Q8. What are your perspectives on recent developments on access to smart meter data?	Smart meter data should be available to EDB's at a cost that only reflects costs of providing. This data should also be available to customers / DG developers to support their system designs and to assess project viability.
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?	SEANZ are not aware of the timeframes that EDB's are working to, but a deadline should be set. Ideally this would be a program of work with a maximum of 3 years duration with milestones across this. e.g. All EDB's need to have an address searchable map of constraints within 12 months.
Q10. What are the barriers and costs to distributors in developing the capability needed to support work on improving network visibility faster?	No view
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 agree
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 – without intervention there will likely be an inconsistent approach and rate of progress
Q13. Do you consider that measures are needed to improve awareness of and encourage use of network visibility disclosures by interested parties?	An understanding of what is available and where to find it would be of value (i.e. a centralised index)
Q14. If further work is required to support the development and use of	Option C. The provision of visibility and data is important and should be a regulated requirement

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.	
Q15. Do you support an approach that focuses on high-voltage networks first, or do you have another preference?	While LV and HV are equally important, HV should be easier to achieve and therefore makes sense to complete first, but timeframes for LV visibility should also be set.
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 view
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?	Prices should be regulated and should only be the data processing costs. Meter costs are already paid for by customers. This should not be an additional revenue opportunity for MEP's.
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)?	Yes