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Electricity Authority
Level 7
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Via email: distribution.feedback@ea.govt.nz

Discussion paper: Exploring network visibility: costs, benefits and value

Introduction

The Lines Company (TLC) appreciates the opportunity to provide feedback on the Electricity Authority's (Authority) discussion paper. The purpose of the paper is for the Authority to test their initial thinking and explore key issues with others to deepen the Authority's understanding of 'network visibility' and consider next steps.

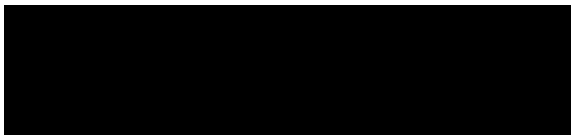
The Authority is keen to:

- explore the costs and benefits of network visibility
- understand how information in current distributor disclosures supports efficient choices on connection and participation in flexibility markets
- consider and inform potential options to promote network visibility.

Summary

TLC is supportive of this discussion. Please find our responses to the questions in the Appendix on the following pages. For further information, please contact the writer, [REDACTED] or Craig Donaldson, [REDACTED]

Yours sincerely



Gerhard Buitendach
General Manager Network

Appendix E Format for Feedback

Exploring network visibility: costs, benefits and value

Submitter	The Lines Company Limited (TLC)
What is your interest in network visibility?	TLC is an electricity distributor keeping over 18,000 customers connected to electricity throughout the King Country, Ruapehu and Central Plateau.

Questions	Comments
Q1. Are you aware of the extent of the information currently being provided by distributors (including through disclosures)?	Yes and we believe the improvements that the Commerce Commission has introduced over the past two years goes a long way providing network visibility data to access seekers.
Q2. How do current distributor disclosures support your understanding of available capacity, constraints and opportunities on: a) high-voltage networks? b) low-voltage networks?	Current ID's asks for data that is readily available for EDB's on the HV network without adding additional cost to the customers base. Current LV ID requirements are also realistic and are practice and process focussed, helping EDB's to formulate a LV visibility roadmap versus forcing visibility that can't be produced currently, mainly due to availability and cost of data as identified in paragraph 1.16 of the consultation document.
Q3. How are you making use of existing disclosures to support more efficient outcomes?	The disclosures support the building of budget plans as part of strategies being formulated to find the most cost-effective ways for our whole customer base to provide value adding visibility to access seekers. It is important that our strategy to build data capability maintains equitability for our customers and not add cost just to provide data that might not be that valuable for access seekers. It is more important that we build relationships with access seekers to understand what information/data they need so we can prioritise aspects of the roadmap appropriately.

Questions	Comments
<p>Q4. Would changes to the type of data, format, regularity or granularity of distributor disclosures better support decision-making? Please provide detail.</p>	<p>Some of the data has huge value for network planning and enabling decarbonisation and/or deferment of capital expenditure. Examples of this is power quality data on LV level. We can see further value supporting decision making in more data availability but there needs to be a sensible timeframe and roadmap created for this. If granularity is forced there is a real risk of non-compliance as digital systems and the implementation of new technologies, both from metering and EDB perspectives need planning, budgeting and implementation.</p> <p>There is value in more granular data for some use cases (such as high impedance / broken neutral detection) but the current half hour data set is suitable for LV visibility and planning and provides a good balance of providing good network visibility and cost effective data storage and handling costs.</p>
<p>Q5. What other disclosures of network information would further inform your choices and decisions?</p>	<p>Our roadmap towards a DSO environment and making energy affordability for our customers are the main inputs/drivers for the visibility/data availability roadmap and strategy.</p>

Questions	Comments
Q6. What are distributors' perspectives on the value of collating and publishing network capacity information for their own businesses?	<p>At TLC we find that due to the mainly low decile and urbanisation environment of our network there are lower uptake of DER compared to more urbanised networks. Organic network growth is less than 2% and we have a good distribution of EV charging facilities across the network already with only a couple of areas identified for EV charging hub growth along state highways. Due to the low volumes of access seekers, the direct contact approach when information is needed is working well for now, however we can see the value of having capacity/constraint maps published and we are working towards this with other EDB's and application providers for HV and MV.</p> <p>We are just at the start of our LV visibility strategy and as explained earlier, and also acknowledged in the consultation paper, LV topology, data availability, smart meter connectivity and cost being the biggest barriers. At the moment collating and publishing LV capacity information is seen as a low priority issue for access seekers on our network with direct contact currently working well.</p> <p>We do want to stress though that this seemingly lower priority from access seekers is not a reason for us not working our way towards more visibility with it being only a time and cost factor. We want to progress to LV visibility for access seekers in a timely, cost efficient and standardised way, working in conjunction with other EDB's in an appropriate manner and pace.</p>
Q7. What are distributors' perspectives on how well interested parties are using the data they already publish?	<p>We can't comment on this with real insight as we have not published heatmap for either capacity or constraints on the network as yet. We have had little access seeker requests which supports the low growth environment at the moment.</p>
Q8. What are your perspectives on recent developments on access to smart meter data?	<p>We have, and have historically had, access to smart meter data on our network for ~90% of ICP's.</p> <p>There are areas on our network without connectivity and until smart meter satellite connectivity is viable there will be gaps in data availability.</p>

Questions	Comments
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?	EDB's in conjunction with the ENA are working towards making it easier to collaborate and benefit from a consistent approach in data collection and technology. The Future Network Forum workstream in this regard together with EDB's working in collaboration together already on software applications etc. Is working well and the pace of this work seems appropriate and matching the complexities and access seeker needs. It should be noted that while this is taking place access seekers still have direct access to EDB's and information provided directly is still ongoing.
Q10. What are the barriers and costs to distributors in developing the capability needed to support work on improving network visibility faster?	<p>Data access for especially the LV network comes at a cost to build the topology, negotiate multiple commercial contracts with meter providers, investing in smart meter firmware and technology upgrades and then developing the visibility maps in conjunction with other EDB's. As also highlighted that due to areas of low to no connectivity there will be some gaps in data for a longer time.</p> <p>As EDB's and the ENA are developing a collaborative approach to this already cost of HV and MV mapping should reduce, which are positive for our customers and will allow us to pace this, making sure it adds value across all stakeholders on our network.</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?	As explained earlier the value will differ across different parts of the country depending on DER and CER growth in particular regions. In low growth, low decile areas interest/value to consumers will be far less. Again, the value of having this information visible on the internet versus direct interaction with the relevant EDB depends on the volume of access seekers for that particular network.

Questions	Comments
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?	<p>Further regulation in addition to what is in place now will add unnecessary cost to our customers and goes against the drive to lower energy cost for New Zealanders. Cost distribution needs to be equitable for all energy users and cost increases to people experiencing energy hardship through additional regulation to make information available which is only valuable to a small percentage of access seekers is not benefitting New Zealanders. Especially as this information can be accessed already, albeit less efficiently at this point in time.</p> <p>Our view is that best outcome for our customers is for EDB's to develop a solution balanced against the pace and need of their customer base, rather than forcing more regulation which would drive cost onto our customers at this time.</p>
Q13. Do you consider that measures are needed to improve awareness of and encourage use of network visibility disclosures by interested parties?	We don't consider further "Measures" necessary as the industry has already reacted positively to the signals and are moving at a realistic pace and cost towards the solution.
<p>Q14. If further work is required to support the development and use of network visibility, which approach do you prefer:</p> <p>a) developing industry guidance or standards.</p> <p>b) introducing a regulatory backstop that would codify the industry guidance or standards.</p> <p>c) developing regulatory standards and timeframes for improving network visibility.</p> <p>d) something else.</p>	<p>a) developing industry guidance or standards supporting work already underway with the ENA and EDB's.</p> <p>It is also important that guidance and standards are made available for all stakeholders such as meter providers, telecommunication etc. As it can't be a Distribution industry problem only battling other non-distribution company constraints.</p>
Q15. Do you support an approach that focuses on high-voltage networks first, or do you have another preference?	Support HV network first while capability and data systems are improved for lower voltage networks.
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?	Haven't done further research into international developments as yet.
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?	Similar to the availability of EDB data MEV's can be approached for this information and publishing the data won't necessarily improve transparency. We note however that technology differences and connectivity cost is likely to make direct comparisons difficult.

Questions	Comments
<p>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)?</p>	<p>Not all EDB's operates under the DDA's and some have separate Use of System Agreements (UOSA) for conveyance in place with retailers. Reinforcing data availability across any form of agreement in place will assist EDB's and other stakeholders to better quality data.</p> <p>Also DDA's are not applicable to MEV data so this mechanism is not considered appropriate to enable or improve availability and affordability of data. We do support finding a suitable and more appropriate solution to reinforce data though from these institutions.</p>