Appendix E Format for Feedback

Exploring network visibility: costs, benefits and value

Submitter	Waipā Networks
What is your interest in network visibility?	Waipā Networks is an Electricity Distribution Business (Distributor).

Questions	Comments
Q1. Are you aware of the extent of the information currently being provided by distributors (including through disclosures)?	Yes Waipā Networks is a Distributor.
Q2. How do current distributor disclosures support your understanding of available capacity, constraints and opportunities on: a) high-voltage networks? b) low-voltage networks?	Waipā Networks is a Distributor rather than a user of disclosures, so the question is not applicable.
Q3. How are you making use of existing disclosures to support more efficient outcomes?	As above.
Q4. Would changes to the type of data, format, regularity or granularity of distributor disclosures better support decision-making? Please provide detail.	As above.
Q5. What other disclosures of network information would further inform your choices and decisions?	As above.
Q6. What are distributors' perspectives on the value of collating and publishing network capacity information for their own businesses?	As per our prior submission to the connection process, Waipā Networks supports publishing more information on available capacity to aid customers seeking to connect and is encouraged by the Authority's focus on making smart meter data more readily available. This will not only create a more efficient interaction between individual Distributors and access seekers, but also from an industry standardisation and Distributor or sector capability enhancement perspective.

	From a Distributor's perspective, the effort invested in collating, validating, and publishing network visibility information delivers tangible operational, strategic, and reputational benefits, even though it requires sustained commitment and resources. Operationally, improved visibility enables better decision-making across the business. High-quality, spatially accurate data on network capacity, voltage performance, and asset condition allows planning teams to target investment more effectively, identify emerging constraints early, and deploy non-network or flexibility-based solutions with confidence. It also enhances day-to-day network management—improving voltage control, outage response, and the integration of distributed energy resources (DERs) such as solar, batteries, and EV chargers. Strategically, publishing visibility information builds transparency and trust with stakeholders. Councils, developers, and large customers can make better-informed decisions when accurate capacity and constraint data are available, reducing project uncertainty and engagement overheads. It also signals the distributor's commitment to supporting decarbonisation, flexible connections, and community energy growth—reinforcing our role as a proactive system enabler. One key point we would like to highlight is that it is not about what is being published, but how the output is generated and the Distributor's capability in generating such information with ease and at scale. • A network may produce the output by aggregating disparate asset information and manually generating the information. • A network with more mature asset information (where network data is truly digitised in a structured manner) can generate the same information at scale and with ease. The sector should aim for the latter position, as it represents capabilities that can be leveraged across all other network business needs into the future. For small-sized EDBs, certain tools and capabilities can be challenging to develop internally, and this presents opportunities to collaborate with others. While the benefits are clear, maintaining accurate datasets and capacity maps involves ongoing effort and cost, particularly where legacy systems and data quality gaps exist. The key is balance

	and coordination—focusing on consistency, quality, and practical usability rather than ever-expanding data volumes. Sector-wide initiatives such as the EEA's Common Data Governance Guide and Common Data Models are essential to streamline effort, improve interoperability, and ensure every Distributor's investment in visibility delivers maximum long-term value.
Q7. What are distributors' perspectives on how well interested parties are using the data they already publish?	No Comments.
Q8. What are your perspectives on recent developments on access to smart meter data?	Waipā Networks has observed that access to smart meter data has improved in recent years, largely due to proactive efforts by some Retailers and Meter Equipment Providers (MEPs). However, opportunities remain to further enhance transparency and reduce barriers to accessing smart meter data. **Timing and Readiness** - While we acknowledge the Electricity Authority's (EA) statement that "over 90% of meters on the distribution network can provide power quality data" and that "some additional investment by meter equipment providers in back-end systems is required," we believe there is room for greater transparency from MEPs regarding their readiness timelines. In particular, MEPs could improve sector confidence by publishing clear roadmaps outlining their plans and timelines for smart meter data provision. Our past communications with various MEPs suggest that experiences in this area have been diverse. **Costing** - Ultimately, consumers bear all costs incurred within the system. As MEPs are uniquely positioned to play a core role in the future operation of the electricity network, transparency around pricing is essential. While we acknowledge the EA's finding that "the price being charged for this data is reasonable for now," we believe MEPs could strengthen trust by publishing or sharing their pricing principles. Specifically, this should include how pricing aligns with future meter or infrastructure upgrade investments and how costs are allocated between charges to Electricity Distribution Businesses (EDBs) and Retailers. Such transparency would build confidence across the sector and among consumers in the fairness of these charges.

	Overall - we believe that improving access to smart meter data through an agreed national framework would materially enhance low-voltage (LV) network visibility and foster better coordination between distributors, aggregators, and consumers. This, in turn, would support greater operational efficiency and enable the development of future flexibility markets.
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?	Although this question is not directed at Distributors, we note that there has been considerable recent work and engagement in this area by Electricity Networks Aotearoa's Future Networks Forum. We believe that the sector is currently at a "just-in-time" position and the current pace should continue. • The current pace of progress in improving network visibility is appropriate and proportionate to the sector's capability, available resources, and the maturity of supporting regulatory frameworks. • That said, there remains scope to accelerate progress — particularly in areas where collaboration, capability, or internal awareness and funding constraints within Distributors currently limit advancement.
Q10. What are the barriers and costs to distributors in developing the capability needed to support work on improving network visibility faster?	This may vary between Distributors, depending on the current state of their information systems and processes. It also depends on the level of granularity required. High-voltage (HV) visibility relies primarily on the Distributor's own network information systems and data collection processes, whereas low-voltage (LV) visibility requires an additional critical input from third-party metering. Regarding third-party metering, a lack of standardisation in power quality data and limited transparency around costs remain key concerns.
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?	We agree that Distributors having a better understanding of network capacity/constraints is in the long-term interests of consumers. Whether publishing this information in an easily accessible way is in the long-term interest of consumers (both existing and potential) or not will depend on what additional benefits access seekers can derive compared to what they would otherwise receive from direct engagement with Distributors.
Q12. Do you consider that there is a case for further regulatory	At this stage, we do not support further regulation on network visibility until ongoing reforms—such as the Commerce Commission's Targeted

intervention to further improve progress and the quality (e.g. timeliness, granularity, format standardisation) of disclosures that improve network visibility?	Information Disclosure Reviews and the Electricity Authority's 2026 capacity-disclosure amendments—are fully implemented and evaluated. The priority should be consolidating and assessing these current initiatives to ensure effective outcomes, rather than adding new requirements that could create confusion. We recommend the Authority focus on • Coordinating data standards and reporting within existing frameworks, working with relevant organisations like the Commerce Commission, ENA, and others. If voluntary measures fail to improve transparency and consistency, more directive regulation, such as mandatory data-quality standards, may be considered, but only after thorough cost–benefit analysis. • Working closely with the MEP, from an end-user perspective, to understand the MEP's plan or roadmap on making data available, and encourage them to proactively disclose such information to Distributors.
Q13. Do you consider that measures are needed to improve awareness of and encourage use of network visibility disclosures by interested parties?	No comments.
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.	Waipā Networks believes any further work should be around a) developing industry guidance or standards. This approach would allow flexibility when required, acknowledging the different size and circumstances applicable to each Distributor and the current state of their network visibility.
Q15. Do you support an approach that focuses on high-voltage networks first, or do you have another preference?	Yes Waipā Networks supports a focus on high-voltage networks first, as there are fewer barriers to the provision of information compared to low-voltage networks, and therefore any benefits are likely to be realised sooner.

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 comments.
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 Waipā Networks supports the mandatory publishing of schedules of available data and prices by metering equipment providers. This would mean Distributors could plan LV analysis or visibility projects fully aware early on of what data is available and the associated costs. This would reduce costs and implementation timeframes. Also refer to our commentary on Q8.
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)?	Waipā Networks believes enhancements to the Code should be made in relation to the availability of meter data to Distributors. However, as DDAs are agreements between Distributors and Retailers, we do not believe Part 12A of the Code is the appropriate avenue for addressing non-consumption data from smart meters. This instead would be better addressed through a separate section of the Code, or through enhancements to Part 10 (metering). As per our prior submission for the network connection consultation, we suggest the Authority adopt an approach or requirement similar to the Australian Energy Market Commission (AEMC) regarding smart meter data. AEMC requires power quality data from small customers' meters be provided to local network service providers for free, primarily for community safety. They believe community safety should not be compromised by cost. Making smart meter data available could significantly help New Zealand achieve its decarbonisation goals and provide essential information as proposed. Thus, following the Australian model is advisable. The AEMC ruling can be found here: https://www.aemc.gov.au/rule-changes/accelerating-smart-meter-deployment