15 October 2025

Electricity Authority
PO Box 10041
Wellington 6143

Via email: distribution.feedback@ea.govt.nz

Consultation Paper – Exploring network visibility: costs, benefits and value

The WEL Networks appreciates the opportunity to provide feedback on the above consultation.

WEL Networks (WEL) is New Zealand's sixth largest electricity distribution company and is 100% owned by our community through our sole shareholder WEL Energy Trust. Our guiding statement of strategic intent is to be leading Waikato's energy future, and we work to ensure that our customers have access to reliable, affordable, and environmentally sustainable energy.

WEL is generally supportive of information disclosures on the state of the networks where this can be done efficiently and will actually be of some real world benefit. Our concerns on current proposals are that the additional disclosures sought have not yet been tightly defined and without this definition may inadvertently be misinterpreted. Some networks may not be able to provision the additional disclosure without greater visibility of their low voltage network. To this end the ability for distributors to access LV meter data from MEPs with the involvement of retailers (which adds inefficiency) should be also addressed.

Where relevant our responses to the specific questions sought by the Authority are attached and should you require clarification on any part of this submission, please do not hesitate to contact me.

Yours sincerely

[redacted]

Andrew Maseyk
Regulatory Specialist
[redacted]

Submitter	WEL Networks
What is your interest in network visibility?	As a distribution business provisioning the information.

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?	
Q3. How are you making use of existing disclosures to support more efficient outcomes?	
Q4. Would changes to the type of data, format, regularity or granularity of distributor disclosures better support decision-making? Please provide detail.	
Q5. What other disclosures of network information would further inform your choices and decisions?	
Q6. What are distributors' perspectives on the value of collating and publishing network capacity information for their own businesses?	There is limited value to published network capacity information unless the assumptions behind the calculated network capacity are understood: • Is the distributor keeping some capacity in reserve? • Is the network capacity a worst case capacity? • Is the location of DG on the network taken into account as DG affects voltage rise differently at different locations. • How the distributor manages congestion.

	The capacity calculation needs to be automated and updated regularly.
Q7. What are distributors' perspectives on how well interested parties are using the data they already publish?	
Q8. What are your perspectives on recent developments on access to smart meter data?	A change to Schedule 10.6 of the Code to allow MEPs to supply data to EDBs without the involvement of retailers would increase simplicity and efficiency of gaining meter data. e.g. **Sch 10.6 Metering equipment provider ongoing obligations and functions** **1 Metering equipment provider must provide access to raw meter data** (1) A **metering equipment provider**…..from the **metering Installation**. *(1A) A **metering equipment provider** must, if it receives a request from a **distributor** with whom it has arrangement to access raw meter data from a **metering installation** for which the **metering equipment provider** is responsible, give remote or onsite access at the services access interface to the person to collect, obtain, and use raw meter data from the **metering installation**.* . . . (3) A **metering equipment provider**… at the **metering installation**. *(3A) A **metering equipment provider** must only give access to a **distributor** under subclause (1A) to raw meter data from **metering installations** at **ICPs** connected to the **distributor's network**.*
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?	Not all distributors are at the same stage. It will be useful if distributors who are ahead worked together to help other distributors move ahead quicker.

Q10. What are the barriers and costs to distributors in developing the capability needed to support work on improving network visibility faster?	Lack of people and money. There are many competing priorities.
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 and no. Distributors have a better understanding of their network but lack understanding of how connected parties intend to operate their DER. For example, a distributor may publish capacity limits for solar based on hot summer day conditions with minimum load. A solar farm developer might choose to design their solar farm to maximise output during winter when prices are higher.
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?	Not at this time. The disclosure requirements need to be more tightly defined, with a view to the actual value and effectiveness of the information.
Q13. Do you consider that measures are needed to improve awareness of and encourage use of network visibility disclosures by interested parties?	Possibly for new entrant developers to make them aware of what is available. Our experience is developers of larger DER and experienced smaller developers (e.g. rooftop solar installers) acquire an understanding of network limits.
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.	Something else. Network visibility needs to be defined before these initiatives are considered. Additionally here are other ways to achieve the desired result for network visibility. WEL Networks has recently implemented a fully automated approval system for residential solar and battery. Approval can be given in 5 minutes and there are no fees. Applications like this achieve the same result as published network visibility information by allowing users to quickly and inexpensively assess network capacity.

Q15. Do you support an approach that focuses on high-voltage networks first, or do you have another preference?	Work needs to be done on the cost and benefits for each approach, which would then naturally to identify the priority based on best value.
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?	
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. With more parties (LV network visibility, multiple traders at an ICP etc) likely to obtaining data from MEPs, care will be needed to avoid over inadvertent over recovery of costs and prohibitive data provision costs do not become a barrier to progression on greater visibility.
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)?	There may be value in amending Part 12A to create a bridge to data from behind the meter devices such as inverters, but as the DDA is an agreement with retailers and it is unlikely that retailers would collecting the data networks would be interested in, we are not sure of the effectiveness of this. As to metering data, it would be far more efficient to remove the retailers from the data interaction between distributors and MEPs as retailer billing data may not always suit distributor requirements (though it has been a proxy in the past).