

Appendix E Format for Feedback

Exploring network visibility: costs, benefits and value

Submitter	Westpower Limited
What is your interest in network visibility?	As a Network Owner, we strive to ensure the costs of network visibility, do not outweigh the benefits of providing it.

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?	Current disclosures were not intended to provide information that would support decisions required by customers to connect to a network. They are historic by nature.
Q3. How are you making use of existing disclosures to support more efficient outcomes?	EDBs are compelled to follow the requirements of the disclosure that do not consider efficient outcomes. They are simply a record of events.
Q4. Would changes to the type of data, format, regularity or granularity of distributor disclosures better support decision-making? Please provide detail.	The disclosures apply to different audiences so getting the right information to the right people would be difficult.
Q5. What other disclosures of network information would further inform your choices and decisions?	For simple networks, customers can easily gather the particular information they need direct from the EDB.
Q6. What are distributors' perspectives on the value of collating and publishing network capacity information for their own businesses?	EDB gather information about their networks for planning purposes. For simple networks, publishing simple capacity information is of no value as it is not sufficiently granular to be informative for a single connection.
Q7. What are distributors' perspectives on how well interested	Online information seeking is becoming more prevalent, but the technical information required for simple connections is not well understood by

parties are using the data they already publish?	consumers, so they are better served with direct consultation to be fully informed.
Q8. What are your perspectives on recent developments on access to smart meter data?	Smart meter data cannot be relied on as it may not be specific to the matter in hand. Such complicated information in the wrong hands could lead to poor decision making by consumers.
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?	The pace of such progress relates to the complexity of the network, so in Westpower's case, the pace of progress is appropriate. There is no improvement needed as it is provided as requested.
Q10. What are the barriers and costs to distributors in developing the capability needed to support work on improving network visibility faster?	Westpower has very small distribution low voltage networks, so customer choice is not influenced by constraints. The cost to provide visibility far outweighs the benefit for consumers
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?	Westpower has a good understanding of network capacity, but this knowledge is held by experienced people and not documented. A simple phone call can provide the required up-to-date information. Documenting capacity is resource intensive and will add unnecessary costs to the EDB's which will ultimately be passed onto Consumers, which goes against directives from the Minister of Energy to reduce energy costs to Consumers.
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?	Regulatory intervention may be required for large, complicated networks, but there needs to be a limit on network size before regulatory requirements are made mandatory.
Q13. Do you consider that measures are needed to improve awareness of and encourage use of network visibility disclosures by interested parties?	No. This should only be required where there is evidence that an individual EDB is making connecting to their Network difficult.
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.	The important thing is for the customer to know well in advance of any commitment they make, that they can connect to an energy supply at minimal cost. That is, there is capacity available. EDBs should be able to provide such information but be left to decide how the information will be made available. That is, they need a system in

<ul style="list-style-type: none"> 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. 	<p>place that works. Regulating such methodology simply adds unnecessary cost.</p>
<p>Q15. Do you support an approach that focuses on high-voltage networks first, or do you have another preference?</p>	<p>Connections at high voltage require direct consultation between customer and the EDB at the first instance, so visibility is not an issue.</p>
<p>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?</p>	<p>International developments are rarely applicable to NZ conditions. New Zealand has low population density and lower revenue, along with challenging topology. Regulatory structures used by other countries are able to be funded by a much larger population base. Any mandatory requirements need to be right-sized for NZ.</p>
<p>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?</p>	<p>Very difficult to understand how metering providers could have useful information for new connections.</p>
<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>Default distribution agreements are useful, but power quality is better addressed elsewhere.</p>