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From: Electricity Engineers' Association of NZ

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Subject: EEA Submission – Discussion Paper – *Improving Visibility of Significant Distributed Generation and Load Projects (Clause 2.16 Information Notice)*

OVERVIEW

The Electricity Engineers' Association (EEA) welcomes the opportunity to comment on the Electricity Authority's consultation paper *Improving Visibility of Significant Distributed Generation and Load Projects: Clause 2.16 Information Notice (October 2025).*

The EEA represents engineers, technical practitioners, and asset managers from across New Zealand's electricity supply industry. Our members include all electricity distribution businesses (EDBs), Transpower, and sector service providers. This submission reflects the EEA's technical and operational perspective, with input from our members and working groups responsible for implementing the Electricity Authority's Network Connections Project and related technical guidance.

The EEA supports the Authority's intent to improve visibility of the distributed generation and load pipeline. Enhanced transparency and coordination will support better system planning, improve confidence in investment, and contribute to long-term reliability and consumer outcomes. However, implementation must be phased, proportionate, and aligned with other reforms—particularly the Network Connections Project, export-limit methodologies, and forthcoming EEA Technical Connection Guidelines.

General Position

The EEA broadly supports the proposal to issue a Clause 2.16 information notice to distributors. We share the Authority's goal of providing a clearer, aggregated view of generation and load developments across the system. Success will depend on strong alignment with ongoing reforms, consistent confidentiality provisions, and proportional implementation that avoids duplication.

By integrating the Clause 2.16 notice into the existing Network Connections framework, the Authority can achieve transparency benefits efficiently and without adding unnecessary cost.

Before addressing the detailed policy and technical aspects, it is important to establish how the proposed Clause 2.16 information notice fits within the wider regulatory landscape. The following

sections outline the EEA's position on key implementation factors—alignment, phasing, confidentiality, and efficiency—that underpin our responses to the consultation questions.

1. Alignment with Existing Frameworks

The proposed Clause 2.16 notice should directly build on the Network Connections Project (Stage 1) Code amendments, which require EDBs to publish a public pipeline for large distributed generation (≥ 300 kW export) and load (≥ 500 kVA) applications from October 2026. Using identical data definitions and terminology for connection stages and project categories will ensure consistent interpretation and reduce confusion.

Interoperable data formats and collection methods will allow EDBs to leverage the same systems and processes across regulatory requirements, avoiding double-handling of information. Aligning the timing of the Clause 2.16 implementation with the Part 6 connection process and the forthcoming EEA Technical Connection Guidelines will also improve efficiency.

Those guidelines, being developed collaboratively with the industry, already include standardised data templates and structures designed for scalable reporting. Integrating them will ensure that data required for Clause 2.16 can be automatically extracted from EDB systems once established.

This alignment is crucial for building a single, standardised information framework that provides the Authority with the visibility it seeks while maintaining an efficient, industry-led reporting system.

2. Implementation and Phasing

The EEA supports a phased implementation approach, as suggested by the ENA, to ensure that reporting obligations are introduced in a practical and manageable way. We recommend quarterly reporting during the initial 12 months of rollout (Phase 1, 2026–2027), followed by a transition to monthly reporting once data quality, confidentiality, and system readiness have been validated (Phase 2, post-2027).

The EEA notes that during the transition period, many EDBs will still be configuring or upgrading their digital systems to support automated data exchange. It is important that the Authority's expectations during this stage remain flexible to avoid significant manual data handling, which increases cost and risk of errors.

This phased approach recognises the significant IT, process, and governance work already underway across the sector to meet new Network Connections and export-limit requirements. It allows EDBs time to develop automated data collection tools, test quality assurance processes, and ensure developers' confidential information is handled appropriately. Gradual scaling also helps the Authority ensure that

the published dataset is accurate, complete, and useful before committing to higher-frequency reporting.

3. Confidentiality and Data Handling

The EEA strongly supports the Authority's commitment to protect commercially sensitive information and to publish only aggregated results. Clauses 2.21 and 2.22 of the Code provide an appropriate foundation for managing confidentiality, but additional guidance and process clarity will be needed to ensure consistency across all distributors.

We recommend that the Authority explicitly guarantee that project-level data will not be disclosed without distributor and developer consent. Aggregation categories should be tested to confirm that they do not allow re-identification of individual projects—especially in smaller regions where a single large development could be identifiable.

The EEA also supports establishing a joint industry–Authority working group to co-develop templates for classifying, marking, and transferring confidential data. This approach strikes the right balance between transparency and privacy and will help maintain developer confidence in the reporting process.

4. Avoiding Duplication

To reduce compliance costs and data inconsistencies, the Clause 2.16 reporting requirements should be fully integrated with the existing EDB public pipelines established under the Network Connections Project. The Authority should leverage these existing mechanisms rather than creating parallel reporting streams.

An API-based or automated data feed between EDB systems and the Authority's database would be the most efficient approach. Using the same data structures and identifiers will allow seamless transfer of information while maintaining accuracy and traceability.

The EEA recommends the Authority collaborate with both EEA and ENA technical working groups to co-design this data exchange model. Such integration will make the reporting system more robust, reduce administrative burden, and ensure consistency in the national dataset.

5. Cost-Benefit and Proportionality

The EEA agrees that improved visibility of distributed generation and load projects will provide significant benefits for the sector, including better investment coordination and planning certainty. However, these benefits will only outweigh the costs if the reporting requirements are proportional and efficiently implemented.

We recommend that the Authority undertake a targeted cost-benefit assessment before mandating monthly data collection. The initial quarterly phase should be used to test the costs, data quality, and practical value of the reports. A review after the first 12 months would ensure that the new system delivers meaningful insights before expanding its frequency.

Smaller EDBs, which have fewer large-scale projects, may face higher relative costs for system changes. Differentiated reporting obligations or additional support may therefore be appropriate to ensure equitable implementation across all network types. Future integration with local authority zoning and subdivision data could strengthen the long-term planning value of the dataset, ensuring the Clause 2.16 framework complements traditional network planning approaches. By focusing on proportionality and staged delivery, the Authority can ensure that visibility improvements enhance—not hinder—sector efficiency.

6. Integration with Future Data Frameworks

The Authority's proposal should be developed in tandem with the EEA's Streamlining Connections programme, which is establishing a national data model for technical connection requirements. Aligning the Clause 2.16 notice with this framework will allow data to flow automatically from EDB systems into the Authority's dashboard and, in time, into wider system-planning tools.

Future iterations of this work should also connect with DER visibility and flexibility initiatives—such as distributed energy resource hosting capacity assessments and flexibility mapping. Doing so would create a unified data environment supporting both investment visibility and operational resilience. Integration at this early stage will future proof the Clause 2.16 reporting framework and avoid the need for future structural changes and avoid short-term manual reporting burdens during the system transition period.

Response to Consultation Questions

The following section provides the EEA's responses to the Electricity Authority's consultation questions. Each answer reflects the collective technical and operational perspective of our members, supported by ongoing work under the EEA Streamlining Connections and Technical Connection Guidelines programmes. The responses are structured to directly address each question while referencing earlier sections of this submission where relevant.

These responses build on the principles outlined above—namely alignment with existing frameworks, proportional implementation, protection of confidentiality, and the avoidance of duplication—to ensure that the Clause 2.16 framework delivers practical and enduring value for all stakeholders.

Q1. Do you agree with the Authority's proposal to require monthly provision of information to the Authority, to enable a 'rolling' set of information?

The EEA supports regular and transparent reporting to improve national visibility of generation and load developments. However, we recommend a phased transition to monthly reporting, beginning with quarterly submissions during the first 12 months. This phased implementation allows EDBs to establish automated data capture systems, refine quality assurance processes, and confirm confidentiality arrangements before moving to more frequent reporting.

In practice, quarterly reporting during the early stage will deliver valuable insights while ensuring that data accuracy and system stability are proven. Once reporting systems mature, monthly reporting can then provide the desired "rolling" visibility. This approach balances transparency and practicality, minimising cost and administrative burden. *(See Section 2: Implementation and Phasing).*

Q2. Do you agree with the proposed kW/kVA thresholds for inclusion of projects under the proposed notice?

Yes. The EEA supports retaining the proposed thresholds (≥300 kW distributed generation / ≥500 kVA load) as these are consistent with the thresholds established under the Network Connections Project (Stage 1) and align with how most EDBs currently define significant connection projects. These thresholds capture projects that are material to network planning and system operation while excluding small-scale connections that would not meaningfully affect aggregate trends. The EEA also notes that while uniform thresholds support national consistency, the local network impact of a project can vary significantly depending on location and network characteristics (e.g. remote rural feeders versus dense urban zones). Acknowledging these limitations will help contextualise the data and better inform planning insights.

Maintaining alignment with existing thresholds ensures a coherent regulatory framework and avoids the need for EDBs to create new classification categories or IT system changes. However, the EEA recommends that the Authority periodically review these thresholds after implementation to confirm they remain appropriate in light of evolving connection patterns and technology trends. *(See Section 1: Alignment with Existing Frameworks.)*

Q3. How are interested parties making use of existing disclosures to support more efficient outcomes?

The EEA agrees that smaller individual projects should not be included in the initial mandatory thresholds, as their inclusion would add administrative burden without materially improving national visibility. However, we note that clusters of smaller projects within a single area or development (for example, rooftop solar on a shared feeder or multiple industrial loads in a precinct) may collectively

exceed the threshold and materially affect network operation. The EEA therefore recommends that threshold and aggregation settings be reviewed after the first year of implementation, using early data insights to assess whether the framework should evolve to capture collective significance rather than only individual project size. The EEA also notes that planned subdivisions where developers covenant DG installations as part of the subdivision design could materially affect network design. Such developments should be considered in future iterations of the framework. *(See also Q10 and Section 5: Cost-Benefit and Proportionality).*

Q4. Do you have any comments on the proposal to require developers (via distributors) to provide increased information on their generation and load projects?

The EEA supports the principle that developers' project data should be provided to the Authority through distributors, as distributors are the relevant Code participants and already manage technical connection processes. This approach maintains regulatory accountability while leveraging existing relationships and systems between distributors and developers.

However, the EEA emphasises that this must be accompanied by clear and consistent guidance on what specific information developers are required to provide, how that information should be submitted, and who retains ownership of the data. The Authority should also specify how consent is obtained from developers for data sharing, particularly where commercially sensitive project details are involved.

To maintain trust and cooperation, developers must be confident that their data will be used appropriately and protected under confidentiality provisions. The EEA therefore recommends that the Authority develop a standardised template or protocol for information collection and consent, co-designed with industry. This will support both transparency and privacy, ensuring data provided via distributors is consistent, complete, and reliable across the sector. *(See Section 3: Confidentiality and Data Handling).*

Q5. Do you have any comments on the proposal to require distributors to provide information that might be classified as confidential?

Yes. The EEA supports the proposal, provided strong confidentiality provisions apply consistently across all submissions. The Authority should guarantee that project-level data will not be disclosed without distributor and developer consent, and that aggregation categories are tested to prevent re-identification. Consistent treatment of confidentiality will be essential to maintaining trust and participation. *(See Section 3: Confidentiality and Data Handling).*

Q6. Do you agree with the Authority's proposal to publish aggregated information?

Yes. The EEA supports aggregated publication, as it increases transparency while safeguarding sensitive data. The Authority should clearly define how aggregation will occur (e.g., by project stage, region, or technology) and confirm that aggregated outputs cannot be reverse engineered to identify individual projects. Coordination with EDBs during the design phase will help validate these safeguards and ensure confidence in public reporting. *(See Section 3: Confidentiality and Data Handling and Q5).*

Q7. Do you agree with the Authority's proposal to aggregate some information provided by distributors to assess the status or stage of projects?

Yes. The EEA supports the proposal to aggregate data according to consistent project stage definitions—such as *Committed, Actively Pursued*, and *Other*—aligned with the methodology already used for the Authority's grid-connected generation pipeline. This consistent categorisation enables cross-referencing between transmission and distribution datasets, providing a coherent national view of connection activity.

The EEA also recommends that the Authority provide clear criteria for determining when a project transitions between these stages, to ensure comparability across all EDBs. A shared taxonomy of project stages will strengthen data reliability and avoid subjective interpretation. Further, aggregated insights by stage will help identify pipeline bottlenecks, regional trends, and timing risks that may inform future connection guideline improvements.

Aligning the approach with the Network Connections Project (Stage 1) and future EEA Technical Connection Guidelines will support consistency, reduce rework, and enable integration of both local and national datasets. *(See Section 1: Alignment with Existing Frameworks).*

Q8. Do you have any comments on when the data collection should commence?

The EEA recommends that the Clause 2.16 notice commence no earlier than mid-2027. This timing aligns with full implementation of the Network Connections Project Stage 1 and allows EDBs to integrate reporting processes, data validation, and confidentiality safeguards into their existing systems. Commencing earlier risks duplication of effort and data inconsistencies, particularly while the connection pipeline reporting mechanisms are still stabilising. A short voluntary trial phase in late 2026 could also help identify refinements before formal commencement. *(See Section 2: Implementation and Phasing).*

Q9. Do you think data collection for DG and load should commence at the same time?

Yes. The EEA recommends that data collection for distributed generation and load commence concurrently to ensure a consistent and complete view of network activity. Implementing both at the same time will enable coordinated system planning, simplify IT integration, and provide a single authoritative dataset. Staggering the two would introduce complexity, potential reporting misalignments, and extra system change costs. Synchronised implementation will also ensure that the Authority's national dashboard reflects the full balance of generation and load growth from the outset. *(See Section 6: Integration with Future Data Frameworks).*

Q10. Do you agree the benefits of the proposed clause 2.16 notice outweigh its costs?

The EEA considers that the proposal's benefits—greater transparency, better coordination of investment, and improved policy insight—can outweigh the costs if the framework is implemented efficiently. To achieve this, the Authority should avoid duplication with EDB pipelines, use existing data structures, and ensure confidentiality protocols are consistent. The EEA recommends a formal 12-month post-implementation review to evaluate data quality, system costs, and practical value. This review should also consider whether aggregated smaller projects (as discussed in Q3) warrant inclusion in future iterations. Such an evidence-based approach will ensure proportionality and confirm that the reporting delivers enduring system-wide value. Future reviews could also assess whether aggregated developments, including covenanted DG subdivisions, warrant inclusion to improve forward visibility of distributed generation clusters. *(See Section 5: Cost-Benefit and Proportionality).*

Q11. Do you agree the proposed clause 2.16 notice is preferable to the other options?

Yes. The EEA agrees that using a Clause 2.16 information notice is the most appropriate and flexible approach for achieving the Authority's objectives. It provides a clear, legally supported mechanism for data collection without the rigidity of a Code amendment, allowing the framework to evolve through guidance and engagement rather than regulatory change. This flexibility is essential as the electricity system transitions and as new technologies, such as DER and community-scale storage, become more prevalent. It also ensures consistency with the Authority's existing reporting approach for grid-connected projects, supporting a single national dataset that is adaptable over time. *(See Section 1: Alignment with Existing Frameworks).*

Q12. Should the Authority consider further work to monitor and assess the pipeline of new generation and demand?

Yes. The EEA supports continued development of this framework to expand beyond basic generation and load visibility. Over time, the Authority should integrate data on distributed energy resources (DER), flexibility services, demand response, and storage to develop a holistic view of how these resources interact within the wider electricity system.

This expanded visibility would enable improved forecasting, coordination of investment, and operational planning. It would also support evidence-based policy development for flexibility markets and consumer participation. The EEA recommends this work be closely coordinated with complementary initiatives—such as the EEA Streamlining Connections Programme, FlexTalk 2.0 Smart Energy Use project, and Network Visibility workstreams—to ensure consistent data definitions and shared insights across the sector.

Developing a unified data environment would enhance long-term planning and resilience, ensuring that the Clause 2.16 framework evolves alongside the energy transition. *(See Section 6: Integration with Future Data Frameworks).*

Conclusion

The EEA supports the Authority's initiative to improve visibility and coordination across the electricity system. Achieving the intended benefits will require implementation that is aligned, phased, and proportionate, while maintaining strong protections for commercially sensitive data. Integrating the Clause 2.16 notice into existing industry data frameworks and the Streamlining Connections programme will provide the most efficient path forward.

The EEA welcomes continued collaboration with the Authority and ENA to refine implementation details, develop standardised data exchange mechanisms, and ensure the resulting framework delivers lasting value for industry and consumers. The EEA supports a collaborative and pragmatic rollout that recognises differing readiness levels across EDBs and enables flexibility during system transition.

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