Appendix A Format for submissions – Parts A and B

Please send us your feedback by 5pm, 4 February 2026

Submitter	Westpower Limited

Questions	Comments
Background and context	

Q1. Do you agree with the assessment of the current situation and context for connection pricing described in section 4? Why, why not? What, if any, other significant factors should the Authority be considering?	Westpower does not agree with the Authority's assessment. The paper implies that a small number of distributors may be over-recovering on new connections, yet the Authority has been unable to provide evidence of this behaviour, despite requests to do so. The mere presence of complaints does not establish overcharging; it more commonly reflects the reality that connection costs have risen due to external factors, including: • High inflation in construction and contractor costs • Regulatory requirements for greater network resilience and build quality • Rapid growth in demand driving more complex and costly network augmentations • Traffic management becoming significantly more stringent and expensive These rising costs are real, not discretionary, and cannot be assumed to be indicators of inefficiency or inappropriate pricing. Assertions regarding "lack of transparency" may simply reflect the inherent technical complexity of new connections, rather than any deficiency in distributors' processes. Before being used as justification for sector-wide intervention, complaints should be properly investigated and validated. Paragraph 4.23 is also unclear. If new connection costs are recovered through ongoing revenue, that revenue is not available to fund the operation and maintenance of the existing network. This creates a cross-subsidy from existing users to new ones, contrary to efficient pricing principles and the Authority's own pricing guidelines. While the proposed fast-track requirements may increase transparency for a very small number of outlier EDBs, for the vast majority, including Westpower, the changes add cost and administrative burden without any discernible benefit to consumers or distributors.
PART A – Connection charges	

Q2. Do you agree with the rationale for considering interim restraint on connection charges described in section 5? Why, why not?	Westpower does not agree. The rationale is overly broad and not supported by transparent evidence.
	• On paragraph 5.2(a):
	If the Authority has evidence of sharply increasing charges by specific EDBs, that evidence should be made public so it can be properly assessed. Without such evidence, it is incorrect to assume increases reflect overcharging rather than genuine cost escalation.
	• On the “neutral point” definition in paragraph 5.6(a):
	Westpower does not agree with the Authority’s interpretation. If ongoing revenue is used to offset connection costs, existing consumers are effectively subsidising new connections as that revenue is no longer available to fund current network operations.
	The true neutral point consists of:
	  ○ the up-front cost (typically paid to external contractors or an internal construction division, not retained by the EDB), plus
	  ○ the Network Capacity Cost (**NCC**).
	  If NCC is standardised across the sector, and up-front costs remain subject to competitive pressures, transparency naturally follows.
	• On paragraph 5.16:
	The suggestion that distributors might intentionally over-recover ignores the fact that most EDBs are consumer-owned. Such behaviour would not be tolerated by shareholders, and is inconsistent with community-focused governance.

Q3. Have you observed or experienced signs of connection stress where current connection charging arrangements caused problems when seeking to connect to the network (eg, projects delayed or deterred as a result of price-related barriers)? If so, please describe.	No. Westpower has not experienced these issues. Demand in our region is growing, particularly from the mining sector, and multiple large projects have approached us for connection estimates. In one major case, Westpower proactively offered a lease arrangement for high-value equipment to avoid large up-front costs for the customer. This demonstrates our commitment to enabling connections and reducing barriers. Given our proactive approach, the proposed interventions would simply layer additional complexity and cost onto a process that already achieves the Authority's objectives without regulatory intervention.
Q4. Do you agree with the Authority's evaluation of the options? Why, why not? Do you have any feedback on the expected impact if the status quo remains?	Westpower acknowledges the options but considers it premature to choose a preferred approach before the effects of the fast-track regime (commencing 1 April 2026) are known. The publication of information under these requirements should naturally lead to greater consistency and transparency, reducing the need for further intervention. For Westpower, the status quo does not present any issues. Implementing additional reforms now risks imposing unnecessary administrative and compliance burdens on distributors who are not contributing to the concerns outlined in the paper.
Q5. Do you have any comments on the proposed Code amendment and approach to implementation?	The concerns the Authority is seeking to address do not arise in Westpower's network, so the proposed amendments are not necessary.

Q6. Are there other alternative means of achieving the objective you think the Authority should consider? If so, please describe.	Yes. A more proportionate and targeted regulatory response would better achieve the Authority's objectives. The consultation paper itself notes that only some distributors recover more than 100% of direct costs. The issue is not widespread. Imposing sector-wide requirements on all distributors unnecessarily penalises those with transparent, low up-front connection charges. A more effective approach would be to: • Identify specific distributors where complaints or evidence suggest issues, and • Apply targeted monitoring, guidance, or intervention to those entities only. This approach resolves the identified problem without imposing avoidable costs on the rest of the sector.
PART B – Distributor supply obligations	
Q7. Do you have any comments on the Authority's rationale for clarifying distributor obligations to connect and supply?	The behaviours identified by the Authority do not occur on Westpower's network. We do not anticipate that the clarifications will materially affect our operations.

Q8. Do you have any comments on the Authority's preferred direction for clarifying distributors' supply obligations?	Westpower supports clarity in the Code where it addresses genuine uncertainty, but we consider the Authority's preferred direction to be broader than necessary. The behaviours described in the paper are not occurring on Westpower's network, and the obligations to connect and supply are already well-understood, consistently applied, and embedded in our existing customer processes. Our view is that any clarifications should be: • Targeted to the specific issues the Authority has identified, rather than imposing additional prescription on all distributors; • Proportionate, avoiding changes that increase compliance cost without delivering material benefits to consumers; and • Principles-based, allowing distributors to respond to local network conditions, safety considerations, and engineering realities. In Westpower's case, the connection and supply obligations are already met in a timely, customer-focused manner, and we do not expect the proposed clarifications to improve outcomes for our consumers. Care should be taken to ensure that any amendments do not inadvertently add cost or complexity where the current framework is functioning effectively.