04 February 2026

Electricity Authority
Via email: connection.feedback@ea.govt.nz

Subject: Submission Response on Reducing barriers for new connections – up-front charges and distributor obligations

ChargeNet New Zealand welcomes the opportunity to provide feedback on the Electricity Authority's consultation on Reducing barriers for new connections: up-front charges and distributor obligations.

ChargeNet builds and operates a nationwide public electric vehicle charging network and regularly seeks new or upgraded connections across multiple electricity distribution networks. As a result, we have direct and ongoing experience with the practical and commercial impacts of current connection charging arrangements and distributor obligations.

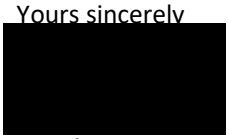
Overall, we support the Authority's assessment of the current situation and agree that aspects of existing connection pricing practices and obligations are creating material barriers to efficient and timely connection, particularly for new technologies and emerging load such as public EV charging. In our experience, inconsistent pricing methodologies, limited transparency, lack of contestability, and high upfront cost allocation can delay or deter otherwise viable projects, distort investment decisions, and undermine efficient network utilisation.

We support the Authority's proposed targeted interim restraint on connection charges and the preferred options outlined in the consultation. In our view, these measures are necessary to prevent inefficiently high connection costs becoming embedded ahead of longer-term reform, while providing greater certainty for access seekers making near-term investment decisions. We also support the Authority's proposed direction to clarify distributors' obligations to connect and supply, including the mandatory offer framework and the requirement to provide alternative connection options where constraints exist.

Our submission identifies effective opportunities to reduce barriers without imposing undue burden on distributors, including greater availability of flexible or dynamic connection classes, improved access to load and network information, and further consideration of benchmarking and relativity measures for connection works and pricing.

We appreciate the Authority's focus on implementation certainty and encourage the publication of clear milestones and guidance to support consistent application across all distributors.

Yours sincerely



Kivash Sewnun
Head of Operations
ChargeNet New Zealand Limited

Appendix A Format for submissions – Parts A and B

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

Submitter	ChargeNet New Zealand

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?	Yes. The current situation assessment accurately describes issues experienced as a CPO operating across multiple distribution networks. Pricing methodologies are inconsistent and lack transparency, making it difficult to plan for future expansion. Upfront costs are often prohibitively high from a subset of EDBs posing a significant barrier to entry in some regions. Potential factors left unmitigated: • Arbitrary connection classes set connection costs by transformer size, when coupled with the difficulty to connect that means access seekers often have to over install capacity paying both the initial capital investment and excessive lines fees that do not represent the incremental load of the for first 1-5 years. • Lost opportunity to right size asset installations for 1-5 years as asset reallocation is not practised by EDBs even though assets will function if relocated and have lifespans of 20-30 years. This is a gross inefficiency for all parties. • Lack of contestability on physical works timing and pricing, caused by the monopoly position of EDBs and small pools of approved contractors, creates a cascade of monopoly position or artificially restricted service providers/supply market This further exacerbates upfront connection pricing pressure for access seekers by limiting competition. Combined works of this nature are in the region of $100k per site in urban areas. As an example, ChargeNet has installed over 20 urban sites in the last 18 months. If competition lowered

	physical works and site management costs by 20% 1-2 new sites could have been funded from private capital. • Punitive timing controls e.g. 45 days to accept a quote that took 18-24 months to receive can lead to connection offers lapsing before all other supporting arrangements can be finalised. With connection costs representing between 20% and 50% percent of site installation it is not always commercially viable to have all other elements pre-arranged. • Price increases on back to back resubmissions i.e. within <3 months of quote expiry typically see >10% increases in pricing, unrelated to CPI or interest rate movements in the related quarter. • Lack of consistent connection classes for businesses operating across New Zealand. The differential between locations and EDB business models does not justify the variety of classes and lack of common categories for installation and operation approaches.
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?	Yes. A targeted interim restraint is warranted to ensure continued access-seeker investment in network upgrades. The sharp increase in forecast cost from some EDBs in the near term will deter or constrain further investment in these regions. Allowed 'unchecked' this would set an unfairly high baseline when further reform takes place.

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.	Yes. ChargeNet has experienced site deferrals and abandonment based on high upfront cost allocation. Depending on the network in question, this is often compounded by high lines charges in certain regions. Connections requested in Vector's network often range quite significantly, with total costs in excess of $1500/kVA capacity estimated for some sites. Inefficient connection costs often lead to months, and sometimes years of delay in finding a suitable alternative in an acceptable cost, generally driven by the access seeker. In the Upper North Island ChargeNet has abandoned development or significantly downsized optimal site investment and locations on at least five sites in the last 18 months. Due to cost and/or implementation constraint. In Wellington, ChargeNet has applied for and then abandon development of at least 8 potential sites over the past 18 months, with the EDB indicating that either capacity is unavailable or that upstream work required would be too costly and take too long. There are no firm commitments to when capacity could be available. In certain regional locations and sparse travel routes, upfront costs are generally high, with associated high on-going lines charges, deterring investment and resulting in portfolio distortion in a nation-wide network. We have attached a slide summarising the impact of lines charges normalising network capacity requirements, resulting capacity for charging and reflecting population/utilisation normalisation.
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?	Yes. ChargeNet supports the targeted intervention as a preferred option. We also welcome the accelerated programme (starting 2028) for distributors with inefficiently high charges.

Q5. Do you have any comments on the proposed Code amendment and approach to implementation?	ChargeNet supports the recommended code amendment and approach to implementation. We would encourage the Authority to publish time-bound inquiry milestones and provide updated Guidance ahead of this date to support consistent implementation across all distributors.
Q6. Are there other alternative means of achieving the objective you think the Authority should consider? If so, please describe.	There are other elements the Authority could implement alongside interim restraint that would not place undue burdens on EDBs. Mandate that all EDBs offer dynamic connection/DER classes (by 1 April 2027 at the latest), with tiered minimum connection contribution and lines charges, with cost effective access to additional capacity when access seekers can demonstrate control and compliance. There are models available within New Zealand of how these classes can operate. Mandate that all EDBs make already collected load analysis profiles available on request. This can be a pay per use service with a default publish after standdown period for other users: • to focus information on the highest value opportunities, and • ensure equity of access so that other potential connector does not pay for the same disclosure twice on behalf access seekers. At a later date other controls that could be explored could include: • $/kVA caps could be a realistic framework to investigate and implement. • Controls on works and programme pricing with relativity measures related to construction differentials in cities/regions i.e. related industry benchmarking.
PART B – Distributor supply obligations	
Q7. Do you have any comments on the Authority's rationale for clarifying distributor obligations to connect and supply?	ChargeNet supports the Authority's rationale on clarifying distributors obligations to connect and supply.

Q8. Do you have any comments on the Authority's preferred direction for clarifying distributors' supply obligations?	ChargeNet is strongly supports the mandatory offer position, including the provision of alternatives based on cost, location and available capacity. Whilst we are also in support of the access standards suite, without oversight or appropriate guardrails from the Authority, the access standards in themselves run the risk of becoming barriers to connecting, especially where EDBs are overly prescriptive on network limits, equipment lists, contractor exclusivity and the like.

Submission Summary– Grid Economics Comparison

- The table compares the financial investment review of actual sites constructed in the last 18 months
- Grid Connection CAPEX costs show disproportionate capital investment requirement in Auckland, when considering installations of similar scale in other regions.
- Typical argument that this is balanced by fixed and variable lines fees does not hold up when normalized for population/utilisation intensity.
- Vector-network sites have materially higher upfront grid connection costs, at ~50% of total capex, versus ~20% for other networks..

			Network Cost, Monthly			Upfront Capex				
EDB Region	Transformer	Site Capacity	as % of scaled Utilisation	per Transformer kVA	per Charger kW	Total Site Capex	of which: Grid Capex	%	Grid Capex per Transformer kVA	Grid Capex per Charger kW
Auckland (Northern)	345 kVA	450kW	15%	$10.24	$7.85	$778k	$404k	52%	$1172	$898
Auckland	500 kVA	300kW	14%	$6.49	$10.82	$599k	$300k	50%	$599	$999
Auckland	345 kVA	400kW	13%	$8.55	$7.38	$569k	$274k	48%	$795	$686
Average - Auckland			**14%**	**$8.43**	**$8.68**	**$649k**	**$326k**	**50%**	**$855**	**$861**
Central Nth Island	267 kVA	300kW	19%	$16.81	$14.96	$333k	$70k	21%	$260	$232
Central Sth Island	500 kVA	450kW	20%	$9.43	$10.48	$496k	$53k	11%	$105	$117
Canterbury	346 kVA	400kW	7%	$2.91	$2.52	$445k	$122k	27%	$351	$304
Average - Other			**15%**	**$9.71**	**$9.32**	**$425k**	**$81k**	**20%**	**$239**	**$217**