

4/06/2024



Electricity Authority
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Tēnā koutou,

CODE AMENDMENT OMNIBUS CODE THREE: CONSULTATION PAPER

1. Unison Networks Limited (**Unison**) and Centralines Limited (**Centralines**) appreciate the Electricity Authority's consultation on the focussed amendments included in the consultation paper.
2. We support Electricity Networks Aotearoa's submission.
3. This submission is focussed on questions 2.1 and 3.1. Unison and Centralines support the proposed changes, in particular:
 - a) obtaining more detail about the type, capacity, and functionality of Distributed Generation (**DG**) installed at ICP level on the registry; and
 - b) increasing the maximum charge for DG applications to adjust for inflation over a three-month transition period.
4. We are concerned with the proposed six-month timeframe and consider 12 months from when the amendments are confirmed more appropriate, if third party suppliers confirm their ability to integrate system changes in that time. We support a secondary consultation about fairly addressing cross-subsidisation in the application fees for DG. Given challenges in forecasting inflation, we support annual reviews to raise fees by CPI.
5. In the meantime, the Authority can assist EDBs to efficiently proceed with the proposals, by clarifying the format data will be required in.

Prudent investment decisions require more granular LV data
6. Unison and Centralines strongly support this pragmatic approach to efficiently obtaining more detail about DG on the low voltage network.

7. As with solar and battery information, obtaining EV location data provides key inputs into network planning judgements required to manage distribution networks prudently and efficiently. Understanding the location and impact of existing load will enable more certain forecasting of capacity constraints and the potential impacts to consumers. It will also enable more understanding of how non-traditional solutions and pricing structures can benefit the network and consumers to minimise upgrades but maintain quality.
8. Unison and Centralines additionally support the benefits for competition in the electricity market by appropriately sharing LV visibility.
9. We support obtaining access to Vehicle to Grid data but query how an EDB will collect it without a direct relationship with the consumer (which we do have with a DG applicant).
10. Our residual concern is about internal system changes which involve third-party supplier changes and integration between systems. We will prioritise changes as able, noting reliance on third party facilitation.

Personal information will be protected

11. Unison and Centralines agree with the Authority that EDBs currently protect personal information and the additional information will be consistently protected. We are looking to understand consumer expectations regarding the privacy value of their DG assets and electricity consumption better. Consumers must also be informed of the value to the electricity market to make prudent investment decisions that will benefit them. This includes in emerging markets that create new potential for consumers to obtain reductions in electricity costs from the market.

Uplifting DG application maximum fees

12. Another consultation may be a more appropriate mechanism to consider the right balance to meaningfully address cross-subsidisation. We support an interim solution of uplifting the maximum fee. Applications above 10MW are significantly more complex and time consuming to process. As more complex applications increase, so is the time and cost to EDBs.

Ngā mihi

Rachael Balasingam
REGULATORY MANAGER