

Code amendment omnibus three: May 2024

<b>Submitter</b>	<b>Lightyears Solar</b>
Questions	Comments
Q1.1. Do you have any comments on the omnibus format or suggestions to improve the omnibus format? Please explain your answer.	The omnibus format with a series of smaller-scale changes are easier to respond to.
Q2.1. Do you support the Authority's proposal to inflation adjust the fees in Schedule 6.5? Please explain your answer	<p>Yes, but as an interim measure only.</p> <p>We do not consider the inflation increase is sufficient to cover the distributor's costs for processing larger scale DG applications, particularly applications over about 4-5MW in capacity.</p> <p>Currently the largest DG application bracket is 1MW. We think an additional pricing bracket for connections &gt;5MW would be useful, or perhaps a sliding scale that is linked to MW size, similar to the Transpower methodology.</p> <p>The introduction of this sliding scale of fee by Transpower greatly reduced the volume of applications and reduced the number of 'tyre kickers'.</p>
Q2.2. Do you agree the proposed amendment is preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010 Please explain your answer.	The proposed inflation adjustment is preferred to doing nothing.
Q2.3. Do you agree with the analysis presented in this Regulatory Statement? If not, why not? Please explain your answer.	Yes
Q2.4. Do you have any comments on the drafting of the proposed amendment?	No
Q3.1. Do you support the Authority's proposal to expand the DG fields in the registry using a two-level structure as described above. Please explain your answer	Yes, we believe greater visibility will provide a base for more efficient use of distribution networks and DER resources.
Q2.2. Do you agree with the transition plan and a six month transition period? Please explain your answer.	No comment

<p>Q2.3. Do you agree the proposed amendment is preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010 Please explain your answer.</p>	<p>No comment</p>
<p>Q2.4. Do you agree with the analysis presented in this Regulatory Statement? If not, why not? Please explain your answer.</p>	<p>Yes</p>
<p>Q2.5. Do you have any comments on the drafting of the proposed amendment?</p>	<p>No comments</p>