

## Appendix A Format for submissions

<b>Submitter</b>	Peter Apperley, Lodestone Energy Limited
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Questions	Comments
Q1. Do you agree with the proposed amendment for connection charges for shared connection assets?	Lodestone welcomes the proposed amendment for connection charges. We also believe it will help ensure a level playing field for new technologies like BESS, which would otherwise be disadvantaged under the current TPM. Lodestone notes that many utility-scale solar projects are designed and built to be battery-ready. The proposed amendment will further facilitate bringing these projects to fruition.
Q2. Will the proposed amendment have any unintended consequences for unusual connection arrangements, eg complex connections?	Lodestone is not aware of any unintended consequences.
Q3. Do you agree with the proposed amendment to the residual charge annual adjustment?	Lodestone supports the proposed amendments to the residual charge adjustment. We are of the view that an uneven playing field could slow the efficient adoption of BESS technology, whose location should be determined by network technical considerations rather than residual charge allocation.  Additionally, we believe that new entrants should be treated equally to existing transmission customers. This will foster competition in the market, ultimately leading to lower electricity prices for consumers.
Q4. The residual charge is intended to be non-distortionary and this proposed amendment is aimed at levelling the playing field and avoiding inefficient investment (irrespective of technology). Are there any other approaches the Authority should consider to address this issue?	Could the Authority provide further guidance or examples on how the residual charge is calculated for a BESS system co-located with a solar system? Specifically, would the BESS system incur a residual charge if it is only charged by the solar system during the daytime?
Q5. Do you agree with the objectives of the proposed amendment? If not, why not?	Yes, we agree.
Q6. Do you agree the benefits of the proposed amendment outweigh its costs?	Yes, we agree.

<p>Q7. 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 main statutory objective in section 15 of the Electricity Industry Act 2010.</p>	<p>Yes, we agree. The proposed amendment would apply consistently across all technologies, including BESS, but not limited to it. This approach helps future-proof the framework for other emerging technologies as well.</p>
<p>Q8. Do you agree the Authority's proposed amendment complies with section 32(1) of the Act?</p>	<p>Yes, we agree.</p>
<p>Q9. Do you agree with the objectives of the proposed amendment? If not, why not?</p>	<p>Yes, we agree.</p>
<p>Q10. Do you agree the benefits of the proposed amendment outweigh its costs?</p>	<p>Yes, we agree.</p>
<p>Q11. Do you agree the proposed amendment is preferable to the other option? If you disagree, please explain your preferred option in terms consistent with the Authority's main statutory objective in section 15 of the Electricity Industry Act 2010.</p>	<p>Yes, we agree. We support applying a uniform conversion factor to all additional loads to ensure a level playing field.</p>
<p>Q12. Do you agree the Authority's proposed amendment complies with section 32(1) of the Act?</p>	<p>No comments</p>
<p>Q13. Do you have any comments on the drafting of the proposed amendment in Appendix A?</p>	<p>No comments</p>
<p>Q14. Do you have any comments on the drafting of the proposed amendment in Appendix B?</p>	<p>No comments</p>