Appendix A Format for submissions

Submitter Manawa Energy

Questions	Comments
Q1. Do you agree with the assessment of the current situation and context for connection pricing? What if any other significant factors should the Authority be considering?	In general, it appears to be a balanced assessment of the current situation.
Q2. Do you agree with the problem statement for connection pricing?	Yes, the inconsistency between distributors in how they approach setting connection charges.
Q3. Do you have any comments on the Authority's proposed pathway to full reform?	We support the proposed approach.
Q4. Do you consider the proposed connection enhancement cost requirements would improve connection pricing efficiency and deliver a net benefit?	Yes
Q5. Are there variations to the proposed connection enhancement cost requirements you consider would materially improve the proposed Code amendment?	It is a good starting framework.
Q6. Do you consider the proposed network capacity costing requirements would improve connection pricing efficiency and deliver a net benefit?	Yes capacity required is a fairer system. Publishing rates will provide customers with better information in the initial planning stages.
Q7. Are there variations to the proposed network capacity costing requirements you consider would materially improve the proposed Code amendment?	No
Q8. Do you consider the pioneer scheme pricing methodology would improve connection pricing efficiency and deliver a net benefit?	Yes but it will depend on how workable the Network scheme is.
Q9. Are there variations to the proposed pioneer scheme pricing	No

methodology you consider would materially improve the proposed Code amendment?	
Q10. Do you consider the cost reconciliation methodology would improve connection pricing efficiency and deliver a net benefit?	The discipline and transparency that this will bring should bring more efficiency into the process.
Q11. Are there variations to the proposed cost reconciliation methodology you consider would materially improve the proposed Code amendment?	No
Q12. Do you consider the reliance limits would improve connection pricing efficiency and deliver a net benefit?	In time they should.
Q13. Are there any variations to the proposed reliance limits you consider would materially improve the proposed Code amendment?	No
Q14. Do you consider the exemption application process (together with guidelines) can be used to achieve the right balance between improving connection pricing efficiency and managing transitional impacts on non-exempt distributors?	It is a starting point.
Q15. Do you consider the dispute resolution arrangements proposed (for both participants and non-participants) will provide the right incentives on distributors and connection applicants to resolve disputes about the application of pricing methodologies to connection charges and improve connection pricing efficiency and deliver a net benefit?	No comment
Q16. Are there variations to the proposed dispute resolution arrangements you consider would materially improve the proposed Code amendment?	No Comment
Q17. Do you consider the alternative contractual terms option would be better than the approach in the	It gives flexibility, this is always a benefit.

proposed drafting attached to this paper? Please give reasons.	
Q18. Do you think a sinking lid approach to reliance limits would be preferable to the proposed static limits approach described in sections 7.80 – 7.105?	No comment.
Q19. Do you think any element of the fast-track package should be omitted, or should begin later than the rest of the package?	No.
Q20. Are there other parameters you think the Authority should consider for the proposed connection pricing methodologies? If so, which ones and why?	Not at this stage.
Q21. Do you agree pricing methodologies should apply to LCC contracts? If not, please explain your rationale.	Yes, for transparency.
Q22. Do you agree the proposed requirements, other than reliance limits, can be applied satisfactorily to connections with vested assets? If not, please explain your rationale.	No Comment
Q23. Do you have any comments on the impact of reliance limits on incentives to increase prevalence of asset vesting?	No
Q24. Do you agree the proposed methodologies are compatible with contestable connection works? If not, please explain your rationale.	No Comment
Q25. Do you agree that fast-track methodologies should not apply to embedded networks? If not, please explain your rationale.	Yes, they should .
Q26. Do you have any comments on the Authority's anticipated solution for longer-term reform?	No
Q27. Are there other alternative means of achieving the objective you think the Authority should consider?	Encourage the operational amalgamation of Networks.