



Network connections project: Stage one amendments

Submission form

Introduction

The Electricity Authority Te Mana Hiko seeks views on the DG proposals in the 'Network connections project: Stage one amendments' consultation paper. To assist you, this submission form includes the questions in that paper in one place, in Microsoft Word and in tabular form.

You are not limited by the questions provided and are encouraged to provide other comments you think are relevant to the Authority's proposals.

Submission details

Submitting organisation	Sustainable Energy Association of New Zealand (SEANZ)
Contact person	[REDACTED]
Contact email	[REDACTED]

Questions

<p>Proposal A questions: Amend the application processes for larger-capacity DG applications</p>
<p>A) What are your thoughts on the proposal to replace nameplate capacity with maximum export power?</p>
<p>This opens the opportunity for innovation behind the meter. Allowing EDBs to restrict generation capacity based on the total installed nameplate value restricts customers' ability to be innovative in the way they use power, whilst maintaining the option to export out onto the grid. Technology has moved on since the original Part 6 was written, and EDBs should only consider the impact on their networks and not the full behind the meter load.</p>
<p>B) Do you support the proposed Process 2 for medium DG (>10kW and <300kW), including the proposed requirements and timeframes? What are your thoughts on the proposed size threshold? What other changes would you make to the medium DG application process, if any?</p>
<p>For DG, it would make sense to push the upper limit for Process 2 to 1MW. this aligns with the Transpower System Operator requirements to be informed on DG installations larger than 1MW, and streamlines the connection process for the ever growing size of DG applications. The lower band could be moved higher to either 20 or 30kW, but at least 15kW (5kW per phase).</p>



<p>C) Do you support the proposed Process 3 for large DG applications ($\geq 300\text{kW}$), including the proposed requirements and timeframes? What are your thoughts on the proposed size thresholds? What other changes would you make to the large DG application process, if any?</p>
<p>The timing of application steps under the process need to consider how these will be policed to ensure they are being upheld by the EDBs. There is currently an 18 month window for applications, though the EDBs don't always enforce them, leaving applications in the queue when the project has stalled.</p> <p>Final Investment Decision (FID) can't come before Final Approval in the process, as it is a requirement for FID. Most equity providers and all banks will require Final Approval prior to FID.</p> <p>The resource consent (Land Owner approval) requirements are a good test of project maturity and should stay.</p>
<p>D) Do you think the Authority should apply any of the proposed changes for large DG to medium DG applications also?</p>
<p>If the size range for medium DG applications is moved from $10\text{kW} <> 300\text{kW}$ to $30\text{kW} <> 1\text{MW}$, then the proposed changes would be useful on medium applications as well.</p>
<p>E) What are your thoughts on industry developing the detailed policies to complement the Code changes proposed in this paper?</p>
<p>F) What are your thoughts on the Authority's summary of capacity rights allocation?</p>
<p>Proposal B questions: Add application processes for larger-capacity load</p>
<p>G) For Process 3 for medium load ($>69\text{kVA}$ and $<300\text{kVA}$) applications:</p> <ul style="list-style-type: none">• Do you support the proposed process and why?• What are your thoughts on the proposed requirements, size thresholds and timeframes?• What changes would you make to the medium-load application process, if any?
<p>SEANZ Members aren't involved in load connections generally, so no comment will be made.</p>
<p>H) For Process 5 for large load ($\geq 300\text{kVA}$) applications:</p> <ul style="list-style-type: none">• Do you support the proposed process and why?



- What are your thoughts on the proposed requirements, size thresholds and timeframes?
- What changes would you make to the large load application process, if any?

SEANZ Members aren't involved in load connections generally, so no comment will be made.

I) Do you think the Authority should apply any of the proposed changes for large load to medium-load applications also? If so, which ones and why?

SEANZ Members aren't involved in load connections generally, so no comment will be made.

J) What are your thoughts on the Authority's summary of capacity rights allocation?

SEANZ Members aren't involved in load connections generally, so no comment will be made.

K) What else does the Authority need to consider beyond the proposals in this paper and why?

SEANZ Members aren't involved in load connections generally, so no comment will be made.

Proposal C questions: Require distributors to publish a 'network connections pipeline' for large-capacity DG and load, and provide information on this pipeline to the Authority

L) Do you support the proposed network connections pipeline, why, why not? What changes would you make, if any? What are your thoughts on the scope of the information to be published?

Yes this is supported by SEANZ, as it offers the ability for Distributed Generation to support Load Connections, and for customers to work together to build shared use assets. This will allow users of networks to innovate and provide non network solutions for customers reducing the construction of more electricity infrastructure, saving customers money.

M) What are your thoughts on the proposal for distributors to provide information directly to the Authority on an ongoing basis?

Consideration needs to be given to the size and capability of the EDB, and the value that this information might provide. For example, Scanpower with 4000 ICP may not require a system on par with Orion, so this should be factored into the proposal.



Proposal D questions: Require distributors to provide more information on network capacity
N) What do you think of the proposal to publish more information on network capacity? What challenges do you see with providing the data? What changes would you make, if any?
Once again, consideration needs to be given to the size and capability of the EDB, and the value that this information might provide.
O) What are your thoughts on the scope and granularity of the information to be published?
Most rooftop applicants won't require this information, so it should be in rural, industrial and commercial areas so businesses and developers can make informed decisions.
Proposal E questions: Update the regulated terms for DG
P) What are your thoughts on the proposed changes to the regulated terms?
The regulated terms generally don't apply to larger installations as bespoke connection agreements are used. The industry would benefit from a set of regulated terms that could be used for larger installations reducing the total cost to developers in negotiating connection terms for every individual EDB. The terms need to be able to be adjusted to suit, so the ability to have bespoke terms should be retained.
Proposal F questions: Add regulated and prescribed terms for load applications and amend dispute resolution requirements
Q) What are your thoughts on the proposed regulated and prescribed terms for load? What changes would you make, if any?
SEANZ Members aren't involved in load connections generally, so no comment will be made.
R) What are your views on the proposed dispute resolution changes for Part 6? In what ways could dispute resolution be further improved? What are your thoughts on the alternative options to deliver dispute resolution discussed in this paper? Do you have any feedback on the 20-business day timeframe proposed?
SEANZ Members aren't involved in load connections generally, so no comment will be made.
S) Do you consider the alternative contractual terms option discussed in this paper (and in the Distribution connection pricing consultation paper) would be better than the proposal without contractual terms? What are your thoughts on the other alternative options referred to?



SEANZ Members aren't involved in load connections generally, so no comment will be made.
Proposal G questions: Increase record-keeping requirements for distributors
T) Do you support the proposal to increase the record-keeping requirements for distributors and why? What changes would you make, if any?
Yes, though the information needs to be centralised so it's available for customers to easily review.
Proposal H questions: Introduce new Part 1 definitions and amend existing definitions (Part 1 only)
U) What are your thoughts on the proposed new definitions and amended definitions for Part 1 of the Code? What changes would you make, if any?
SEANZ agrees with the changes to the definitions proposed under Part 1 of the code. No changes are recommended.
V) What other terms do you think the Authority should define and what definitions do you propose for those terms?
Time of use load - This should be defined as the time in which a load intends to be
Proposal I question: Make minor and incidental amendments to Part 6
W) What are your thoughts on the proposed minor and incidental changes to Part 6? What minor and incidental changes has the Authority missed and what changes would you make, if any?
SEANZ agrees with the minor and incidental changes to Part 6.
Transitional arrangement questions
X) What are your thoughts on the transitional arrangements for the proposals in this paper? Submitters can consider individual proposals when responding to this question.
SEANZ agrees that all proposal should be implemented in unison, though the Proposal D may provide an area for some leeway to allow EDBs to obtain the information required to meet the code change proposed.
Y) What proposals do you consider the most important? How long do you think is needed to implement these?
The process changes are the most important and offer the greatest benefit for developers and installers of Solar. These should be prioritised over other changes. 6 months is ample time to implement these changes.
Code drafting question



Z) Do you have comment on the Authority's drafting of the proposed Code changes? What changes would you make, if any?

No changes are proposed.