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To: The Electricity Authority

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### Network Connections Project – Genesis Submission

Genesis Energy Limited (**Genesis**) welcomes the opportunity to comment on the Electricity Authority’s (**the Authority**) *Network Connections Project: Stage One Amendments* consultation paper. Genesis supports the objectives of the Authority’s proposals. As stated in the Statement of Government Policy to the Electricity Authority (GPS), electrification of the economy, particularly industry and transport, will require a significant growth in renewable generation, and achieving this will require significant investment including into distribution networks. Efficient network connection processes are critical to enabling this.

Consistent with the GPS, including the Government’s goal of doubling renewable electricity generation, and the Government’s goal of installing 10,000 public EV chargers by 2030, we support the Authority’s proposals as part of the Network Connections Project to improve efficiency through more consistent and standardised network connection processes, better use of existing capacity, and reduced barriers for new connections. We believe this will improve outcomes for consumers, industry and market participants.

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## Proposal A Consultation Questions – Genesis Energy’s response

<b>Proposal A questions: Amend the application processes for larger-capacity DG applications</b>
A) What are your thoughts on the proposal to replace nameplate capacity with maximum export power?
Yes, we agree with this proposal as it will more accurately reflect actual network usage, and therefore provide distributors with better information when assessing the impact new distributed generation will have on their network. The proposal may also help improve efficiency and lower costs for network expansions.
B) Do you support the proposed Process 2 for <u>medium DG (&gt;10kW and &lt;300kW)</u> , 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?
Genesis supports these proposals. Standardisation will improve efficiency and remove unnecessary complexity for applicants. Splitting out applications according to the proposed sized thresholds should reduce unnecessary delays to simpler projects and allow larger, more complex proposals to be assessed appropriately.
C) Do you support the proposed Process 3 for <u>large DG applications (≥300kW)</u> , 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?
Yes, we support these proposals, including A13 requiring projects to meet milestones to retain position in the pipeline as this will ensure speculative, under-prepared projects do not unnecessarily take up distributors’ resource and slow-down the process for active and ready projects.
D) Do you think the Authority should apply any of the proposed changes for large DG to medium DG applications also?
Yes, we support the Authority considering whether some of the proposed provisions for large DG could apply to medium-sized DG applications, including A5 (albeit fees could be set lower for medium-sized DG), A6, and A13.

## Proposal B – Genesis Energy’s response

<b>Proposal B questions: Add application processes for larger-capacity load</b>
<p>G) For Process 3 for medium load (&gt;69kVA and &lt;300kVA) applications:</p> <ul style="list-style-type: none"><li>• Do you support the proposed process and why?</li><li>• What are your thoughts on the proposed requirements, size thresholds and timeframes?</li><li>• What changes would you make to the medium-load application process, if any?</li></ul>
<p>We agree with the proposal to prescribe processes for load, including specifying timeframes for approvals. We agree these processes should be aligned to the processes for distributed generation and differentiated based on specified thresholds, covering small, medium and large sized load applications. Similarly, we suggest the Authority could consider the merits of extending certain of the processes for large distributed generation (A5, A6 and A13) to medium-sized load.</p> <p>One general comment we make is that the Authority should also consider how to treat technologies with functionality to both import and export electricity to and from networks, such as battery energy storage systems or vehicle-to-grid enabled EV chargers. We suggest the Authority ensure the proposals are future-proofed, for example by harmonising the processes for generation and load (as proposed in the Paper).</p>
<p><b>B5. Add an application process to connect, or amend an existing connection, for large-capacity load</b></p>
<p>H) For Process 5 for large load (<math>\geq 300\text{kVA}</math>) applications:</p> <ul style="list-style-type: none"><li>• Do you support the proposed process and why?</li><li>• What are your thoughts on the proposed requirements, size thresholds and timeframes?</li><li>• What changes would you make to the large load application process, if any?</li></ul>
<p>Yes, we support this proposal, for these reasons stated above.</p>
<p>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?</p>
<p>As above, we suggest the Authority consider whether extending certain proposals for distributed generation to medium-sized load applications, specifically proposals A5, A6 and A13, would also be merited and help improve efficiency.</p>

### Proposal C – Genesis Energy’s response

**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, Genesis supports the Authority’s proposal, provided there are adequate protections for commercially sensitive information.

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

As above - Genesis supports the Authority’s proposal, provided there are adequate protections for commercially sensitive information.

### Proposal D – Genesis Energy’s response

**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?

Genesis supports the proposal to require electricity distributors to publish more information and data on the capacity of their low voltage electricity networks. This will improve information available to industry and help improve decision-making about the location of new generation or load, for examples public EV chargers. Publishing this information should also enable distributors and retailers to develop non-network solutions to capacity issues, thereby potentially lowering network upgrade costs.