Chairman: Warren McNabb,
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Secretary: David Inch, david@nzenergy.co.nz

20 December 2024

Submissions
Electricity Authority
P O Box 10041
Wellington 6143

By email: connection.feedback@ea.govt.nz

Dear team,

Re: Network connections project: Stage one amendments

The Independent Electricity Generators Association Inc. (IEGA) appreciates the opportunity to make this submission on the Electricity Authority's (Authority) proposed changes to the distribution network connection process for distributed generation and related other changes to Part 6 of the Code.[1]

The IEGA comprises about 30 members who are either directly or indirectly associated with predominantly small-scale power schemes connected to local distribution networks throughout New Zealand for the purpose of commercial electricity production. A membership criterion is that the generation must be distribution network connected.

Members have a portfolio of new economic renewable generation projects consented or under investigation which have a smaller environmental footprint than grid-connected generation and provide an incremental, rather than a step change, increase in supply more aligned to increasing local demand for electricity. These generation investments can defer or avoid capacity expansion of distribution and transmission networks – lowering overall system cost to NZ consumers. Efficient and fair processes to connect to distribution networks is therefore critical to our members' business.

The detail in Part 6 of the Code is therefore of substantial importance. This submission focuses primarily on proposals relating to connection of distributed generation.

Key points

We have provided answers to the Authority's questions in Appendix B. This Appendix should be read in conjunction with our following key points:

[1] The Committee has signed off this submission on behalf of members.

Thresholds

In our view the new thresholds are arbitrary.[2] Applying a different more lengthy process at 300kW compared with 299kW is not justified by any technical complexity. The process could be driven by whether the connection is to the 400V, 11kV or 33kV lines. However, this probably still doesn't reflect complexity of connection applications. Low, medium or high complexity with an industry wide understanding and application of what constitutes varying complexity would enable simple (low complexity) connections (of any capacity) to be fast-tracked[3] and highly complex connections to be subject to more detailed analysis.[4]

The IEGA recommends a connection application approach based on a New Zealand wide categorisation of complexity will create efficiencies in the application process for connecting distributed generation and load. This will make connecting to a network easier, faster, more equitable and more consistent across New Zealand.

Recommended change:

- Adopt an industry wide classification of what constitutes a low, medium or high complexity connection application and adopt a connection application process based on these categories of complexity

Timeframes

While the proposed regulated timeframes now provide certainty about the end date for approval at each step of the application process – these timeframes are too long, particularly for the generation scale described as 'medium'.[5] Many electricity distribution businesses (EBDs) already process applications within significantly shorter timeframes. Our concern is EDBs may not be resourced to cope with the increasing number of applications as well as regulated timeframes for load applications so that the processing time for generation connections slips to be much closer to the regulated limits. A generator has no recourse until the regulated timeframes are breached.

Recommended changes:

- Consistent with our recommendation for application processes aligned to the complexity of a connection:
    - low complexity connections should be fast-tracked and processed within 3 weeks
    - the time limit for processing a medium complexity connection be no more than 6 months
    - the time limit for processing a medium complexity connection be no more than 12 months (without taking into account the 12 month and 90-day flexibility for the applicant to submit the next application form)
- EDBs' discretion to have extensions is limited to one (and not two) extensions at any point in the process

[2] The new thresholds of <10kW and less than 300kW – described as medium scale (Appendix 2) and equal to or greater than 300kW – described as large scale (Appendix 3)

[3] The current Part 1A of Schedule 6.1 of the Code already applies this approach.

[4] This approach makes sense for processing load connection applications as well.

[5] And basically no better than the current Code

- The length of any extension be reduced to 20 business days

Conflicts of interest

EDBs are increasingly interested in constructing their own generation. A policy decision to increase the threshold for corporate separation and arm's-length rules is also imminent. This means more generation projects will be built without the transparency of separation between an EDB's network business (responsible for approving connections) and the generation activity (making an application). The IEGA is concerned that Part 6 does not provide competing generation applicants with assurance that an EDB is processing its own generation connection application on the same terms and timeframes as it is processing third party applicants.

Recommended change:

- Amend the Code to require equal treatment of all applications so that if there is evidence that an EDB's generation application is getting preferential treatment a breach claim can be made

Prioritisation of Final applications

The proposed Code has a significant change in the criteria used to prioritise final applications in Appendix 2 for medium DG.[6] The EDB has discretion to process applications in accordance with its decision that in whole or in part which applications would likely involve:

  - the optimal use of the distribution network [AND]
  - while achieving the most long-term benefit for consumers

The IEGA disagrees with the proposed approach. Each EDB should not be expected to develop its own interpretation of the "most long-term benefit to consumers". It is highly discretionary to assess the "most long-term benefit to consumers".

The current Code (c.17) states the Distributor:

  - may consider the final applications together as if they were competitive bids to use the same part of the distribution network; and
  - must consider the final applications in light of the purpose of Part 6 of this Code

The purpose statement is to "enable" connection of generation and load when the connection is consistent with connection and operation standards. An EDB has the expertise to determine a connection is consistent with connection and operation standards.[7]

Recommended change:

- any discretion the EDB has to apply to final applications should be based on the purpose statement of Part 6 - to enable connection of DG (and not each EDB applying their own interpretation of the statutory objective - progressing applications that offer the 'most long-term benefit to consumers')

[6] Schedule 6.1 Appendix 2 c.9

[7] We note the proposed Code in Appendix 3 (large DG) uses the purpose of Part 6 as the criteria for considering final applications (Schedule 6.1 Appendix 3 c.14)

Queuing and prioritisation management policy

The IEGA supports industry developing a prioritisation, queuing and management policy (as opposed to the Authority proposing detailed requirements). Work on this policy must be balanced as there are likely to be opposing views between EDBs and connecting parties. Our strong preference is for the ENA to work with EDBs **and** interested stakeholders (connecting parties) to develop a prioritisation, queuing and management policy to be used by all EDBs.

Recommended change:

- Amend the Code so that all EDBs use the queuing and prioritisation management policy developed by the ENA

Load applications and allocation of capacity rights

The IEGA's submission does not comment on the proposed Code for load connections. However, our observation is that the proposed Code is very siloed. In essence the same process is being proposed for processing load applications as generation applications but with shorter timeframes.

In reality, these two parties on the network are not siloed - connection of new generation can provide benefits / capacity for the EDB to connect new load.[8] Increasing the diversity of generation and load connected to a distribution network also has benefits. The IEGA recommends the Authority consider how EDBs can be required to review applications from generation and load as complementary.

The consultation paper includes an identical table on how the proposed Code in effect allocates capacity rights.[9] Our questions are:

- Are the EDBs allocating the same capacity to both generation and load (therefore generation and load are competing Final applications) or is there network capacity for generation (injection) and separate network capacity for load (offtake)?
- Is Final approval of a generation connection application expected to be considered when the EDB considers a load application?
- Should 'Prioritisation of final applications' involve 'calling in' final applications for generation connections and final applications for load connections that are all in the same part of the network. Or is it correct, as the Code is written, to have these two directions of electrons treated in siloes.
- What approach results in the most optimal use of network capacity?

Recommended changes:

- As discussed above EBDs should be required to achieve the purpose of Part 6 of the Code to enable connection of generation **and** load. At any point of discretion this purpose should be the focus
- The Authority should consider whether the above is sufficient to ensure that EDBs approach to connecting new generation and load is not siloed

[8] The limited times when the impact of these connections on a network is not complementary is when there is no generation but load or vis versa.

[9] Pages 48 and 59

Increased transparency of network capacity and connection pipeline

Overall, the IEGA supports the proposed increase in public information about network capacity and the connection pipeline. However, improvements could be made.

Recommended changes:

- Clarify if the Code reference to 'time of use capacity' at zone substation feeders and low voltage transformers will provide the dynamic capacity information expected to be required for flexibility offerings
- Generation investment is a competitive market. The Authority should clarify that detailed location information (eg GPS coordinates) about new generation connections will not be publicly disclosed

Confidentiality provisions

The IEGA is concerned about the confidentiality provisions when the EDB has the responsibility for deciding what information should remain confidential from the Authority without a requirement to discuss this with an applicant. The Authority can also override the EDBs decision on what is confidential.[10]

Recommended changes:

- Amend the Code to require EDBs to consult applicants about the information that should remain confidential

Concluding remarks

We assume there is a positive cost benefit case for regulating a process with specific timeframes for load connection applications. Our impression is that EDBs are struggling to keep pace with the volume of applications.[11] Unless new resources or streamlined processes are in place, the imposition of specific timeframes (and the potential to breach the Code) in and of itself is unlikely to 'make the boat go faster'. Selfishly, the IEGA is concerned that EDBs applying resources so as to be compliant with load application timeframes could delay EDBs' approval of generation connection applications when there is clearly already a tight supply situation for the next several years even at current demand levels.

We would welcome the opportunity to discuss this submission with you.

Yours sincerely

[redacted]

[redacted]

[10] Clauses 6.3A, 6.3B and 6.3C

[11] Section 4.3 ENA Briefing to Incoming Minister November 2023
https://www.ena.org.nz/resources/publications/document/1435

APPENDIX A: Background on the IEGA

IEGA members are small, entrepreneurial businesses, essentially the SMEs of the electricity generation sector, who have made significant economic investments in renewable generation plant and equipment. Combining the capacity of member's plant makes the IEGA the sixth largest generator in New Zealand. We are price takers in the electricity market – the majority of our members do not have the financial or human capacity to operate 24/7 dispatching into the wholesale market.

The IEGA's portfolio of generation is 100% renewable with members' owning and operating the full range of renewable generation technologies: hydro, wind, geothermal, solar and biomass and energy storage.

Our members are innovative, entrepreneurial and passionate about New Zealand's renewable advantage and potential who have made significant economic investments in generation plant and equipment throughout the country. They have a portfolio of new economic renewable generation projects consented or under investigation which have a smaller environmental footprint than grid-connected generation and provide an incremental, rather than a step change, increase in supply more aligned to increasing local demand for electricity.

These generation investments can defer or avoid capacity expansion of distribution and transmission networks – lowering overall system cost to NZ consumers. Further, commercial scale distributed generation can be financially incentivised to supply network support services to distributors to assist manage peak demand and network power quality – an increasingly important service as industry and transport demand more renewable energy.

APPENDIX B: Submission details

Submitting organisation	Independent Electricity Generators Association Inc.
Contact person	[redacted]
Contact email	[redacted]

Questions

Proposal A questions: Amend the application processes for larger-capacity DG applications
A) What are your thoughts on the proposal to replace nameplate capacity with maximum export power?
Maximum export capacity or nameplate capacity is irrelevant if our preferred approach to categorising applications based on complexity is adopted – see answer to question B).
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?
In summary, the thresholds are arbitrary and too low and the timeframes too long. **Thresholds** We understand the Authority is reviewing Schedule 6.1 Part 1 and Part 1A next year. But the threshold for these Parts has a direct impact on the current proposals – imposing a 'greater than 10kW' starting point. 10kW is too low – residential solar installations are increasing in size - but of more relevance is that a residential home is wired at 15kW so 15kW is a more logical demarcation for domestic versus commercial scale generation. A change to 15kW should be implemented in this round of Code changes and not wait until implementation of the review of Schedule 6.1 Part 1 and Part 1A. Applying a different process at 300kW compared with 299kW is not justified by any technical complexity. The process could be driven by whether the connection is to the 400V, 11kV or 33kV lines. However, this probably still doesn't reflect complexity of connection applications. Low, medium or high complexity with an industry wide understanding and application of what constitutes varying complexity would enable simple (low complexity) connections (of any capacity) to be fast-tracked[12] and highly complex connections to be subject to more detailed analysis.[13] We suggest it would be reasonably clear to EDBs and applicants what is a highly complex connection (some examples: requiring upgrades of a wider part of the network; requiring Transpower to be involved).

[12] The current Part 1A of Schedule 6.1 of the Code already applies this approach.

[13] This approach makes sense for processing load connection applications as well.

In our view, this approach would provide a more efficient and cost-effective approach to processing connection applications for generation and load.

Recommended changes:

- In order of preference, the thresholds should be amended:
    1. Strongly preferred option is to adopt an industry wide classification of what constitutes a low, medium or high complexity connection application and adopt a connection application process based on these categories of complexity
    2. If 'complexity' is too difficult to implement, the connection process should be based on the line capacity being connected to – 400V, 11kV or 33kV
    3. The least preferred, least efficient and arbitrary alternative is a threshold based on generator capacity. Thresholds for capacity should be amended to:
        - Part 1 and Part 1A threshold be increased from 10kW to 15kW for domestic solar installations
        - amend medium scale to be 15kW to less than 5 MW
        - amend large scale to be 5MW and greater

Timeframes

While the proposed regulated timeframes now provide certainty about the end date for approval at each step of the application process – these timeframes are too long. This is particularly the case for the generation scale described as 'medium'.[14] Many electricity distribution businesses (EBDs) already process applications within significantly shorter timeframes.

Some generation types are very homogeneous so that fast-track application processes are appropriate. For example, the equipment and technology of solar PV installations and its impact on network power quality is homogenous so that the only concern of an EDB is whether the export injection capacity can be accommodated. The main consideration is therefore the complexity of the physical connection to the network.

If the thresholds for different connection application processes are based on complexity, as we suggest above, the timeframes will also reflect complexity.

Recommended changes:

- Consistent with our recommendation for application processes aligned to the complexity of a connection:
    - low complexity connections should be fast-tracked and processed within 3 weeks
    - the time limit for processing a medium complexity connection be no more than 2 months
    - the time limit for processing a highly complex connection be no more than 12 months (without taking into account the 12 month and 90-day flexibility for the applicant to submit the next application form)

[14] And basically no better than the current Code

Conflicts of interest

EDBs are increasingly interested in constructing their own generation. A policy decision to increase the threshold for corporate separation and arm's-length rules is also imminent. This means more generation projects will be built without the transparency of separation between an EDB's network business (responsible for approving connections) and the generation activity (making an application). The IEGA is concerned that Part 6 does not provide competing generation applicants with assurance that an EDB is processing its own generation connection application on the same terms and timeframes as it is processing third party applicants.

Recommended change:

- Amend the Code to require equal treatment of all applications so that if there is evidence that an EDB's generation application is getting preferential treatment a breach claim can be made

Extensions

The proposal is that distributors can seek extensions to decision timeframes:

- up to 80 business days (BD) for any reason; and
- up to 80 BD if grid studies are required; and
- up to 40 BD during the Final Application approval process for large DG

Using all these extensions at least doubles the processing time for generation connection applications. The applicant has no ability to influence the use of this extension time.

Recommended changes:

- EDBs' discretion to have extensions is limited to one (and not two) extensions at any point in the process
- The length of any extension be reduced to 20 BD

Investigative studies

For both medium and large DG, in the Initial application stage distributors are required to give applicants information about any further detailed investigative studies that the distributor reasonably considers are necessary to identify any potential adverse effects the generation may have on the system.[15]

For medium DG it appears that the results of these studies are to be included in the completed Final Application (the Code is unclear but it is at this stage that the distributor can seek extensions if grid studies are needed).

[15] Schedule 6.1 Appendix 2 c.3(e) and Appendix 3 c.3(e)

The results of studies are included in the Interim Application for large DG – referred to as "initial studies".[16] The results of these studies are therefore taken into account in the distributor's decision on the Interim Application.

The above analysis of the Code implies investigative studies are undertaken once – when in practice distributors often repeat studies which substantially delays decision making.

Recommended changes:

- EDBs' discretion to claim an extension for grid studies be limited to an extension of 20 business days (and not up to 80 BDs in the proposed Code)
- the Authority consider if the Code should be more specific about the scope of these studies so that completion of one study will provide sufficient information

Prioritisation of Final applications

The proposed Code has a significant change in the criteria used to prioritise final applications in Appendix 2 for medium DG.[17] The EDB has discretion to process applications in accordance with its decision that in whole or in part which applications would likely involve:

- the optimal use of the distribution network [AND]
- while achieving the most long-term benefit for consumers

The IEGA disagrees with the proposed approach. Each EDB should not be expected to develop its own interpretation of the "most long-term benefit to consumers". This component of the statutory objective has been interpreted by the Authority in making its decisions on the final Code. It is highly discretionary to assess the "most long-term benefit to consumers".

The current Code (c.17) states the Distributor:

- may consider the final applications together as if they were competitive bids to use the same part of the distribution network; and
- must consider the final applications in light of the purpose of Part 6 of this Code

The IEGA submits that the current criteria using the purpose statement should be retained.

The purpose statement of Part 6 is basically unchanged.[18] The purpose statement is to "enable" connection of generation and load. This is appropriately facilitative of connecting new generation and load when the connection is consistent with connection and operation standards. An EDB has the expertise to determine a connection is consistent with connection and operation standards.

We note the proposed Code in Appendix 3 (large DG) uses the purpose of Part 6 as the criteria for considering final applications.[19]

Recommended change:

- any discretion the EDB has to apply to final applications should be based on the purpose statement of Part 6 - to enable connection of DG (and not each EDB applying their own

[16] Schedule 6.1 Appendix 3 c.9(2)(b)(v)

[17] Schedule 6.1 Appendix 2 c.9

[18] The word 'load' is (obviously) being inserted into the purpose statement

[19] Schedule 6.1 Appendix 3 c.14

interpretation of the statutory objective - progressing applications that offer the 'most long-term benefit to consumers')

Other comments

The IEGA supports the Code allowing applicants to resubmit within a reasonable timeframe without losing their position in the queue and without incurring additional costs.

We also support the change to get approval at each step, and that approval automatically applies if the distributor does not meet the regulated timeframes.

C) Do you support the proposed Process 3 for large DG applications (≥300kW), 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?

The answer to question B) above should also be read in relation to large DG applications.

The proposal for large DG is for a 3-stage process:

- the Initial stage is the same as for medium DG
- the Interim stage is the same as the Final stage for medium DG; and
- the Final stage – which can take between 60 and 80 days (3-4 months) when the only 'activity' during this stage is confirmation the DG has accepted the conditions stipulated in the Interim stage (which already has approval) and providing evidence of a project investment decision and Overseas Investment Office approval, if available.[20]

The IEGA queries the purpose of the Final stage:

- is it a rubber-stamping step, which should take no more than a week?
- securing bank funding requires evidence that the generation is approved for connection to the network, that is the Final Application approval. What does the Authority expect in a "project investment decision"?
- what is meant by "if available"?
- the Code allows for the distributor and applicant to agree that a Final application is not required. Does the Authority have any expectations about the circumstances under which a Final application is not needed?

D) Do you think the Authority should apply any of the proposed changes for large DG to medium DG applications also?

The process for large DG includes c.21 on "Approved applications must meet milestones to retain priority position in distributor's network connections pipeline" and the related c.22 on "Treatment of approved applications at the same network location". The IEGA does not support copying/applying these clauses to medium DG applications.

E) What are your thoughts on industry developing the detailed policies to complement the Code changes proposed in this paper?

[20] Schedule 6.1 Appendix 3 c.12(3)

We assume this question relates to the Authority's discussion in section A13 which proposes large DG projects meet milestones to maintain their position in the connections pipeline. The milestones are proposed to apply once the distributor has given its final approval.[21]

The IEGA supports industry developing a prioritisation, queuing and management policy (as opposed to the Authority proposing detailed requirements). Work on this policy must be balanced as there are likely to be opposing views between EDBs and connecting parties. Our strong preference is for the:

- ENA to work with EDBs **and** interested stakeholders (connecting parties) to develop a prioritisation, queuing and management policy; and
- all EDBs adhere to this policy.

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

Our feedback is based on the table on page 48 of the consultation paper summarising capacity rights allocation for large DG applications.

The Authority seeks feedback on what the Authority has not considered:

- What is the capacity right allocation under the application process for medium DG? The application process in this case is an Initial step and a Final step. On Final Approval the applicant would expect to have firm capacity rights. The rights cannot be conditional on meeting milestones because there is no Code requirement for this.
- We note the Authority expects DG can request final capacity rights earlier if it commits to fully fund the necessary infrastructure. This process/outcome is not set out in any Code. Further, a generation investor is only likely to agree to fully fund infrastructure IF they already have confirmation that the distributor has conferred final/non-negotiable capacity rights.
- The section on 'Network investment capacity rights' is also unclear. This process/outcome is not set out in any Code.

Other comments

Our submission does not comment on the proposed Code for load connections. However, our observation is that the proposed Code is very siloed. In essence the same process is being proposed for processing load applications as generation applications but with shorter timeframes.

In reality, these two parties on the network are not siloed - connection of new generation can provide benefits / capacity for the EDB to connect new load.[22] Increasing the diversity of generation and load connected to a distribution network also has benefits. The IEGA recommends the Authority consider how EDBs can be required to review applications from generation and load as complementary.

[21] The problem definition (para 5.126) says "under-prepared applications can hinder progress of later applications". Milestones only apply once the distributor has given final approval. So under-prepared projects (not applications) could be hindering progress.

[22] The limited times when the impact of these connections on a network is not complementary is when there is no generation but load or vis versa.

The consultation paper includes an identical table on how the proposed Code in effect allocates capacity rights.[23] Our questions are:

- Are the EDBs allocating the same capacity to both generation and load (therefore generation and load are competing Final applications) or is there network capacity for generation (injection) and separate network capacity for load (offtake)?
- Is Final approval of a generation connection application expected to be considered when the EDB considers a load application?
- Should 'Prioritisation of final applications' involve 'calling in' final applications for generation connections and final applications for load connections that are all in the same part of the network. Or is it correct, as the Code is written, to have these two directions of electrons treated in siloes.
- What approach results in the most optimal use of network capacity?

Recommended changes:

- As discussed above EBDs should be required to achieve the purpose of Part 6 of the Code to enable connection of generation **and** load. At any point of discretion this purpose should be the focus
- The Authority should consider whether the above is sufficient to ensure that EDBs approach to connecting new generation and load is not siloed but enabling

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?

Overall, the IEGA supports the proposed increase in public information about network capacity and the connection pipeline. However, improvements could be made.

Recommended changes:

- Clarify if the Code reference to 'time of use capacity' at zone substation feeders and low voltage transformers will provide the dynamic capacity information expected to be required for flexibility offerings
- Generation investment is a competitive market. The Authority should clarify that detailed location information (eg GPS coordinates) about new generation connections will not be publicly disclosed

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

The IEGA is concerned about the confidentiality provisions when the EDB has the responsibility for deciding what information should remain confidential from the Authority without a requirement

[23] Pages 48 and 59

to discuss this with an applicant. The Authority can also override the EDBs decision on what is confidential.[24] *Recommended change:* • Amend the Code to require EDBs to consult applicants about the information that should remain confidential
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?
See answer to question L)
O) What are your thoughts on the scope and granularity of the information to be published?
See answer to question L)
Proposal E questions: Update the regulated terms for DG
P) What are your thoughts on the proposed changes to the regulated terms?
A new clause has been added in relation to obligations where a distributor's power quality obligations are breached (c.3(7)). Clause (b) appears to say that if DG injects reactive energy due to network conditions that is not related to resolving power quality obligations then this reactive energy must be subject to a network support services agreement between the DG and the distributor – otherwise the generator's actions are a breach of the Connection Agreement. The IEGA requests more information on the purpose of this clause. Is it always the case that network conditions mean a generator wouldn't inadvertently inject reactive energy? Are all distributors committed to signing a network support services agreement?
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?
No comment.
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?
The IEGA supports the existing Dispute Resolution clauses for distributed generation. These provisions have been proven to be effective for generators on Default terms.

[24] Clauses 6.3A, 6.3B and 6.3C

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?
The IEGA does not support the alternative contractual terms option discussed in the paper. The Default terms are in use for distributed generation and have proven to be effective for both parties – if they weren't parties would have been strongly incentivised to negotiate a bilateral agreement within the regulated timeframe.
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?
Record keeping is only useful if it is being monitored and analysed, resulting in breaches if the Code is not adhered to.
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?
The new defined term for 'second final application' seems redundant. The definition mirrors the words where the term is used once in the Code. Excluding the word "second" as a defined term in the Code would remove the need for this definition.
V) What other terms do you think the Authority should define and what definitions do you propose for those terms?
No comment.
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?
We note Appendix B summarises these changes, but the track changes make it too difficult to identify / comment on any proposed 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.
The proposed 12-month transition period is reasonable.
Y) What proposals do you consider the most important? How long do you think is needed to implement these?
No comment.

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?
Accurate headers and/or footers on each page are essential to assist with navigating this Part of the Code.