

# 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	Manawa Energy
Contact person	[REDACTED]
Contact email	[REDACTED]

### Questions

<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?
<b>This is a better approach as it reflects the physical capability of the connection.</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?
<b>Medium DG should be from 69 kW as this matched better the metering Category of Cat 2 or CT metering.</b>
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?
<b>This process should be set at 1 mW as above this level requires a participant to follow the part 8 requirements. above 1 mW will also be part of the metering Category 4 which will involve a class A test house to certify the installation.</b>

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

No

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

Support

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

Support

**Proposal B questions: Add application processes for larger-capacity load**

G) For Process 3 for medium load (>69kVA and <300kVA) applications:

- 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?

We believe that the better and already known thresholds should be based on the Metering Category's. Which at 400 volts are >100 amps - <500 amps Cat 2 and should also include Cat 3 sites which at 400 volts is >500 - < 1200 amps . effectively moving the top threshold to < 827 kVa

H) For Process 5 for large load ( $\geq 300\text{kVA}$ ) applications:

- 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?

This threshold should be > 827 kVa to match the metering category of 4

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?

No

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

Appears to address the issue.

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

No Comment

**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

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

No comment

**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?

More information is helpful but this needs to be balanced against the cost of collection.

O) What are your thoughts on the scope and granularity of the information to be published?

The cost of granularity will be the limiting factor.

**Proposal E questions: Update the regulated terms for DG**

P) What are your thoughts on the proposed changes to the regulated terms?

Support.

**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?

Support.

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?

Support

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?

Support

**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?

Support

**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?

No comment

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?

No comment

**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.

No comment

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?

No Comment



20 December 2024

Submissions  
Electricity Authority  
Level 7, AON Centre  
1 Willis Street  
Wellington 6011

Via Email : [connection.feedback@ea.govt.nz](mailto:connection.feedback@ea.govt.nz)

## SUBMISSION ON THE NETWORK CONNECTIONS PROJECT – STAGE ONE CONSULTATION PAPER

Manawa Energy welcomes the opportunity to provide feedback on the Electricity Authority's consultation paper 'Network connections project – stage one' from October 2024.

Manwa Energy support the Authority's objective with the stage one amendments, specifically through saving consumers costs by increasing the efficiency, reliability and competitiveness of distribution networks.

Kind regards,

[Redacted signature block]

