20 December 2024

Electricity Authority
Via email: connection.feedback@ea.govt.nz

Subject: Submission Response on Proposed Part 6 Code Amendments

Please find attached ChargeNet's submission on the consultation into Part 6 of the Electricity Industry Participation Code 2010. This is an incredibly important consultation that can ultimately help determine the pace of electrification of the New Zealand economy.

ChargeNet is a leading Charge Point Operator, providing essential infrastructure for electric vehicle (EV) charging. Our interest in the proposed amendments stems from their potential impact on the EV charging infrastructure rollout and our ongoing operations.

ChargeNet endorses the Authority's proposals within the Network Connections Project. These proposals seek to enhance distribution network efficiency through more uniform and standardised connection processes, optimise existing infrastructure capacity and reducing connection barriers.

Connections to the electricity network are the cornerstone of job creation, wealth generation and an electrified economy, not gambles nor burdens. The current inconsistencies in connecting to the country's 29 EDBs is a major barrier to electrification that must be addressed. These proposed code amendments go some way towards addressing the existing inequality faced by nationwide businesses that are attempting to electrify our economy.

We welcome the proposed amendments to Part 6 and feel this consultation is a long overdue opportunity to rewrite some parts of the Code and prepare for the upcoming changes to the electricity network driven by low carbon technologies.

Additionally, ChargeNet recommends that the Authority explore the regulatory approach for technologies with dual functionality—specifically, those capable of both importing and exporting electricity to and from networks, such as battery energy storage systems and vehicle-to-grid enabled EV chargers. ChargeNet suggests that the Authority future-proof the proposals by harmonising processes for generation and load, as outlined in the consultation paper.

Our submission provides detail on where we think the review needs to go further – for example in relation to load thresholds – and we would value the opportunity to meet with the Authority and discuss the contents of this submission in detail.

Yours sincerely

[redacted]

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	ChargeNet Limited
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?
ChargeNet supports the principles of this proposal. The proposal to move to Maximum export power allows for the EDB to more accurately price into the project cost potential export rather than the crude measure as currently in the code
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?
ChargeNet supports the principles of this proposal. In relation to load we have views on sizing and thresholds and some of those thresholds may be relevant to DG practitioners.
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?

Support process 3 amendment but refer to above answer on thresholds. Data displayed in the consultation does not consider he technological changes in the EV market and drift towards larger chargers. Agree with the principle of fees for processing applications but wary of mission creep and see fees increase substantially as a way of recovering costs early from EDB – what is the right number for a deterrent? An inflation adjusted one off fee (e.g. $5000 inflation adjusted) could reduce or eliminate placeholder applications. ChargeNet supports the interim stage proposal providing it is clearly flagged on the queue as being interim. No complex proposal classification needed. ChargeNet believes that the timeframe from interim proposal to final is too long – 90 days suggest that a substantial additional amount of work is required to proceed to final. ChargeNet believes that the bulk of this work is done in the initial proposal. Consequently, ChargeNet believe that a period of 45 days should be sufficient for the Distributor to transition from initial to final decision.
D) Do you think the Authority should apply any of the proposed changes for large DG to medium DG applications also?
ChargeNet supports the process 4 changes introduced for medium load but recommend a higher threshold of 500KVa versus the proposed 300KVa. The New Zealand Transport Authority (NZTA) recommends the CCS2 connector for new electric vehicles in New Zealand. Standardized by the International Electricity Commission (IEC), it supports up to 1,000V DC and 500A, equating to 500kVA. The large load application process starts at 300kVA, which is mid-range for high-power charging (HPC) Electric Vehicle Supply Equipment (EVSE) using CCS2. This could distort the EVSE market. ChargeNet believes that timeframes under both processes give the Distributor too long to respond. Any substantial complexity is covered in the proposal as an extension – the bulk of applications will be similar in nature and should not require the time to respond suggested. We propose that the EA consider a much shorter timeframe for response from the Distributors.
E) What are your thoughts on industry developing the detailed policies to complement the Code changes proposed in this paper?
ChargeNet supports the flexibility of commercial standards being set outside of the Code as this allows for faster amendment time.
F) What are your thoughts on the Authority's summary of capacity rights allocation?
ChargeNet supports the EA proposal
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?

ChargeNet cites the same arguments as in the above response to be applicable in this instance due to the 300KVa threshold being too low. Technology has advanced in charger output and the EA needs to consider that advance and the likely advance in the future.

ChargeNet understands that the New Zealand Transport Authority (NZTA) recommends the CCS2 connector for new electric vehicles in New Zealand. Standardized by the International Electricity Commission (IEC), it supports up to 1,000V DC and 500A, equating to 500kVA. The large load application process starts at 300kVA, which is mid-range for high-power charging (HPC) Electric Vehicle Supply Equipment (EVSE) using CCS2. This could distort the EVSE market.

For instance, a 320kW charger would require the large load process, while a 275kW charger would only need the medium load process, despite both being suitable. To prevent market distortion, the large load threshold should align with the IEC standard and exceed 500kVA.

ChargeNet supports the medium load application process but as stated elsewhere we would like to see a reduction in process times. Process 4 as written could potentially take up to 40+30+40+40+40+40 = 230days (circa 1 year) - we would like to see this cut to a third (4 months from application to works agreement).

ChargeNet also supports the industry developing guidelines which can be altered more quickly than making changes to the Code. If outside of the Code oversight by the EA is important and collaboration with the industry vital to ensure the best outcomes.

ChargeNet is conscious of the Luxon Government 10k charger programme. Without these changes to Part 6 it is unlikely to succeed.

H) For Process 5 for large load (≥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 large load application process, if any?

Process 5 could take up to 360BD - 18 months, this is far too conservative – the industry can comfortably accommodate a third of this timeframe (6 months for large load).

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?

ChargeNet would support proposals that reduce the application timeframes for both large and medium load projects. On that basis any additional process improvements beyond those

suggested for medium load applications should use a reduction in time to complete as a threshold
J) What are your thoughts on the Authority's summary of capacity rights allocation?
ChargeNet supports the proposal
K) What else does the Authority need to consider beyond the proposals in this paper and why?
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?
ChargeNet generally supports the proposal. Increased visibility of the application pipeline is important for applicants to make judgements about available network capacity. A proviso is that the data is anonymised to ensure protection of the applicants. Extra proviso is that the visibility needs to be balanced with commercial sensitivity. For instance, the capacity could be registered at a substation level to avoid commercial sensitivity.
M) What are your thoughts on the proposal for distributors to provide information directly to the Authority on an ongoing basis?
Support 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?
ChargeNet strongly believes that visibility on network capacity (both 11kV and Transform LV) will be hugely helpful in doing an initial assessment of a site. The information should be made available via electronic data share (such as GIS or similar). Sufficient regulatory commitment from the ComCom and the EA will be required for that transformation to occur at a pace that is effective to enable significant electrification in New Zealand.
O) What are your thoughts on the scope and granularity of the information to be published?
ChargeNet supports the proposal and believes that the granularity should be sufficient to enable both access seekers and distributors to make speedy allocation decisions.

Proposal E questions: Update the regulated terms for DG
P) What are your thoughts on the proposed changes to the regulated terms?
ChargeNet supports the proposal
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?
ChargeNet supports the proposal
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?
No comment
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?
No comment
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?
ChargeNet supports the proposal
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.
Support transitional arrangements
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