Electricity Engineers' Association

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To: The Electricity Authority
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From: Electricity Engineers' Association of NZ

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Subject: EEA Submission – Consultation Paper – *Network Connections Project (Stage One) – Code Drafting*

OVERVIEW

The Electricity Engineers' Association (EEA) welcomes the opportunity to provide feedback on the Electricity Authority's consultation on Code drafting for Stage One of the Network Connections Project.

This consultation represents an important step in the Authority's Streamlining Connections programme. Clear and consistent drafting of the Code is essential to ensure that New Zealand's electricity system is well placed to manage the increasing pace of distributed energy resource (DER) uptake, the electrification of industrial and transport load, and the integration of new technologies such as batteries and EV chargers.

Our members—comprising distribution businesses, Transpower, consultants, technology providers, and service companies—are responsible for delivering safe, reliable, and efficient network connections across Aotearoa. They are at the forefront of managing these changes and implementing the Code provisions in practice. The EEA's submission reflects our members' direct operational experience and our ongoing collaboration with the Electricity Authority and the Electricity Networks Association (ENA) to develop practical industry guidance under the Streamlining Connections programme. Our advice is grounded in the day-to-day realities of network planning and operation, ensuring that regulatory settings remain technically sound and practically workable.

We commend the Authority's stepwise approach to implementation and its focus on technical consultation at this stage. In our view, the draft Code amendments are broadly workable and consistent with the policy decisions taken in July 2025. However, several refinements are required to ensure the provisions operate effectively and avoid unintended consequences in practice.

Summary of Key Points

- Overall support: The EEA supports the intent and structure of the draft Code, which we consider an essential foundation for more efficient and transparent connection processes.

- Definitions: Clarification is required for terms such as flexible connection, generating plant, and network connections pipeline to ensure consistent interpretation across the sector.
- Hybrid and BESS connections: The current drafting does not adequately address installations with both load and generation. We support ENA and Russell McVeagh's proposed scheme:
    - Applications should be assessed based on the largest component (load or generation), with both disclosed.
    - Battery energy storage systems (BESS) should always be treated as load first for pricing purposes.
    - BESS connections should be governed by negotiated contracts rather than regulated DG terms.
- Processes for large load: Introduction of new processes for >69 kVA load is welcome, but timeframes may need adjustment for complex industrial or transport electrification projects.
- Capacity and pipeline disclosure: Transparency obligations are supported, but feeder and substation "capacity" information must be treated as indicative only. Actual available capacity varies along the feeder due to voltage profile and conductor size changes, so publishing a single value can be misleading. The Authority should stress that applicants must consult the relevant distributor for location-specific assessments. The Authority may wish to reference ENA's queue management work as an example of good practice, while leaving flexibility for distributors to determine their own approach.
- Timeframes and clock-stop mechanism: These are supported in principle, but additional safeguards are required (written justification and limits on pause periods).
- Confidentiality: Stronger protections are appropriate but should be underpinned by objective criteria to avoid over-claiming.
- Dispute resolution: Extension to non-participants is reasonable but would benefit from standardised templates to reduce administrative burden.
- Alignment with industry guidance: The Code should explicitly recognise EEA/ENA technical guidelines as examples of "good electricity industry practice," ensuring coherence between regulatory and industry frameworks.

These refinements will help ensure the Code amendments deliver the intended benefits—greater transparency, consistency, and efficiency in the connection process—while avoiding the risks of oversimplified or inaccurate capacity disclosures and allowing flexibility for distributors to align with industry frameworks, such as those developed by ENA, where appropriate.

Further detail on these points, including specific drafting recommendations, is set out in the clause-by-clause table that follows.

Specific Feedback

Clause-by-Clause Feedback

Clause	EA Drafting (summary)	EEA Comment	Recommended Change
Part 1 – Definitions (flexible connection)	Defines 'flexible connection'	Ambiguous between contractual curtailment vs dynamic controls	**Clarify:** 'flexible connection means a connection where load or generation can be curtailed under contract or by dynamic network control.'
Part 1 – Definitions (generating plant)	Includes BESS, EV chargers	Appropriate but should cross-reference safety regulations	**Add:** 'must comply with AS/NZS 4777, Electricity (Safety) Regulations 2010, or successor instruments.'
Part 1 – Definitions (network connections pipeline)	Definition provided	Needs consistency with ENA queue policy	**Add:** 'in accordance with the distributor's published queue and priority-setting methodology.'
6.3 (Capacity information)	Quarterly publication of feeder/substation capacity	Useful for transparency, but a single feeder capacity figure is inherently inaccurate as capacity varies by location and feeder design. Providing misleading data could result in poor investment or application decisions.	**Add:** 'Distributors may publish indicative information only. Applicants must confirm actual capacity and voltage conditions with the distributor. The Authority should make clear that distributors are not required to provide quantified feeder capacity data if such information could be misleading.'
6.3(4) (Pipeline reporting)	Monthly DG/load pipeline disclosure	Support but align with ENA framework	**Require:** 'Pipeline reporting should, where practicable, be consistent with recognised industry

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			practice (for example, ENA's queue management framework) and may be aggregated where confidentiality requires.'
6.3(1A)–(1B) (Confidentiality)	Protects confidential information	Support, but risk of over-claiming	**Insert test:** 'information is commercially sensitive if disclosure could reasonably cause material disadvantage.'
6.8, 6.8A (Disputes/complaints)	Expands to non-participants	Appropriate, but increases burden	**Add:** *'Complaints should be submitted using a standardised template approved by the Authority.'*
6.12A (Clock stop/start)	Pauses timeframes when info is missing	Supported, but risk of abuse	**Require written justification;** specify max cumulative pause period (e.g. 20 business days).
Part 6B Pricing principles	Pricing for load vs DG	Hybrid/BESS unclear	**Add:** 'Where installation includes load and generation, assess largest component. BESS treated as load for pricing.'
Regulated terms vs contract	DG may connect on regulated terms if no contract	Not workable for BESS	**Add:** 'Regulated terms do not apply to BESS. Must connect under a negotiated contract where import/export capability exists.'

Contact

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