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Electricity Authority
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Tēnā koe,

Network visibility: An efficient approach for EDBs providing customer benefit

We welcome the opportunity to respond to the Electricity Authority (**Authority**)'s issues paper on improving information on high voltage (**HV**) network capacity. Powerco supports improved network visibility for areas that customers value and it is our view that a regulatory approach will drive improvement nationally. However we strongly object to duplicative regulatory obligations as overlapping regulations is inappropriate. Quantified cost-benefit analysis would highlight where a regulatory response delivers the most benefit and would avoid focusing on areas that are high cost and do not deliver net-benefit outcomes.

Our summary observations are:

Customers will benefit from accessible capacity information	• Customers do benefit from improved visibility of our network information • Regulation will assist to drive improvement nationally, and can provide direction on approaches that meet customer's needs • However, regulatory requirements must be focused on that customer need. A clear understanding of the information customers are looking for, and why, should inform adjustments to the detailed requirements
Regulatory overlap is inappropriate and costly and must be avoided	• This proposal must be a joint solution between the Authority and the Commerce Commission which avoids overlap, or disjointed requirements • The inefficiency and complexity of the regulatory overlap is understated in the Authority's consultation • There is a significant cost to regulatory overlap which has not been appropriately considered in the cost-benefit analysis
Regulation must be based on quantitative assessment	• Regulation is required as there is potentially considerable cost in the digital transformation that sits behind the maps and data (rather than the maps themselves) and the incentives to make that investment are not always clear • Quantitative cost-benefit assessment will support targeting the regulation at the appropriate customer-identified gaps • Improved visibility can provide benefit to distributors' relationship with their customers through the connection process, however there is less benefit for distributors' planning and network management than the Authority suggests

We comment on these observations, provide feedback on the specific proposals and recommended adjustments, and respond to the Authority's questions in the attachment.

This submission does not contain any confidential information. We are always keen to meet with the Authority to discuss and develop the ideas in our submissions. In the meantime, if you have any questions or would like to talk further on the points we have raised, please contact Irene Clarke (Irene.Clarke@powerco.co.nz).

Nāku noa, nā,

Emma Wilson
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POWERCO

Improving information on high-voltage network capacity

1. Customers will benefit from accessible capacity information

Powerco is committed to continued improvement in visibility of our network information this is part of delivering our customer commitments[1]. Customers and access seekers are looking for accessible and useful network information, and an easy interface with the Electricity Distribution Business (**EDB**). Our commitment to this will continue to progress regardless of regulation or other options to codify network visibility.

The consultation paper does not clearly demonstrate that the proposals are aligned with what customers and access seekers are looking for. The Authority has consulted with access seekers over an extended period, however, the consultation paper does not outline the outcomes of this. We are concerned that the proposals may not accurately reflect the priorities and needs of customers.

Making masses of technical information "visible" to customers serves little purpose. Rather it is about the customer interface with that data providing the assistance they are looking for in their decision making. Network data is granular, automated and computationally intensive. It isn't necessarily complex, but it needs big processing power, refined data handling, bulk storage, adaptable but robust platforms and big data pipes. The digital transformation is both a challenge and an opportunity and sits at the core of serving the long term benefit of consumers.

Our view is that improved clarity, standardisation and consistency in network information has the potential to deliver significant customer benefit and is best done through regulation and agreed technical standards. Customers will benefit from consistent approaches to data formats that customers can interrogate.

Consistency is not required in what the maps look like, how they are produced, or the modelling that sits behind them, but rather a consistent type and format of data across EDBs (like the ID datasets) that customers can readily access, will add value. We are aware from our collaborative Localflex trial that EDBs have different capability to map aspects of network management at a feeder level. Understanding from customers those aspects where consistency is key, will be important.

Ultimately, real time capacity information and autogenertion of data will support connection processes to the extent of avoiding the need for network studies. This will be a significant benefit for both access seekers and EDBs. But this requires a digital transformation in the model that sits behind this network intelligence, and a long term view of customer benefit is well beyond publishing a map.

2. Regulatory overlap must be addressed or the proposals risk unjustified complexity and inefficiency

The consultation paper confirms that the Code may generally not regulate anything that the Commerce Commission (**Commission**) is authorised to regulate under the Commerce Act, unless these set quality or

[1] Customer Commitments

information requirements for one or more distributors in relation to access to distribution networks.[2] We disagree with the Electricity Authority (**Authority**) view that the proposed amendments are specifically about access to the distribution network, at most, they may support customer engagement with EDBs about access. Throughout the consultation paper, there is discussion about benefits and costs that are broader than access (for example benefits for regulatory decisions or benefits from deferral of network investment or costs of storing data. Further, existing information disclosure (**ID**) requirements regulate very similar information which is available for access seekers. Disclosure / improved visibility can have aligned outcomes and serve multiple purposes, that doesn't mean you need duplicative requirements.

The inefficiency and complexity of the regulatory overlap is understated. For example, the Authority does not acknowledge the duplication, effort and cost involved in:

- Addressing some network capacity/reliability information quarterly vs annually
- Information requirements through ID schedules vs published data tables, data covering the same aspect of network management but completely different data sets required to be generated based on Code vs Determination focus
- The potential for non-compliance due to contradictions or confusion in similar but changing outputs required.

The process of producing disclosure requirements can be time-consuming and complex, particularly investment required to develop new data reporting systems. For example, it took Powerco several months to establish systems for the worst performing feeder data and the network geographic information. Modifying these requirements with the addition of the Authority's proposals would need considerable redevelopment, testing, and verification by resource across the business. We need to understand the form of information that is needed by regulators and/or customers and streamline this into one clear requirement to avoid potentially considerable development cost and duplication in effort across our systems and staff.

While we agree some form of regulatory response is appropriate, we are disappointed in the approach regulators have taken to designing the best regulatory solution. New requirements for publishing network capacity information must be a joint solution between the Authority and the Commission which avoids overlap, or disjointed requirements. The Authority notes it has engaged with the Commission[3] but will consult formally before amending the Code, yet the consultation paper does not discuss the results of that engagement or options that the Commission may have identified. It is disappointing that the Authority will rely on formal consultation later, probably beyond a point where alternative options could be fully considered.

Our recommendation is that all requirements be consolidated into the ID Determination. If there is unacceptable delay until this can have effect, an industry guideline could be released in the interim.

[2] Electricity Authority, *Improving information on high-voltage networks consultation paper*, 5 May 2026, at 3.6

[3] Electricity Authority, *Improving information on high-voltage networks consultation paper*, 5 May 2026, at 3.8

3. Quantitative cost-benefit assessment is required to focus regulation and best achieve the desired objective

Given the cost involved in improving capacity information, we see value in a regulatory solution to drive this improvement across all EDBs. However, quantitative cost-benefit assessment is required to target the regulation at the real gaps, in order to determine the detailed specifications that offer the most customer value (the outcomes) rather than a focus on the EDB data systems (the inputs).

Yet the Authority makes repeated statements that quantitative cost benefit information is not available.[4] A quantitative assessment is possible and must be pursued by the Authority. As an example, Sapere completed a cost-benefit study on low-voltage (**LV**) monitoring which is referenced in the consultation paper. Given the potential costs involved and different views on benefit, it is imperative that there is a clear understanding of the costs and benefits of different options for published data and mapping.

Notwithstanding a quantitative cost-benefit analysis, in our experience, publishing network capacity information is beneficial to our relationship with customers and supports our commitments to our customers. However, the benefit to EDBs planning and network management suggested by the Authority is overstated. Network capacity information is already used in our planning and customer connections processes, and this should be the case across all EDBs. But publishing the information externally doesn't generate any additional benefit directly.

Powerco is working on a digital transformation across our business, where modelling network capacity is one aspect. We know from our experience publishing capacity maps, that implementing new approaches to data and modelling are costly, with substantive cost sitting in the data that supports the mapping output.

4. The proposals require adjustment

As mentioned above we fully support a regulatory solution to improve network visibility however, the individual requirements must be targeted at the aspects of HV network information that customers want and need. They must also be established through regulation that is streamlined and aligned with existing regulatory approaches to achieve the best cost/benefit.

In the following we comment on aspects of the specific information proposals, and where adjustments should be considered. The responses to the Authority's consultation questions (section 6 below) also provides further comment.

Maps vs data sets

We agree that both maps and data sets will provide value for customers, however there must be a rationalised and coordinated approach between the Code and ID requirements. This is to:

- Avoid complexity and unnecessary cost
- Streamline EDB data sets

[4] For example, at 5.44 and 5.75 in Electricity Authority, *Improving information on high-voltage networks consultation paper*, 5 May 2026.

- Ensure customers access only one source of data.

Network circuit information

No change required to proposals, this is base information for EDBs and should be easily provided in both maps and data sets.

Design capacity information

As above, this is also base information that EDBs should already have available. However, there is a difference between design capacity (DG hosting capacity) and demand capacity (load) which is why Powerco publishes two separate maps for these two separate aspects. It's important that the code enables separate maps, which seems to be provided in the wording of proposed clause 6.3(2)(dg).

The wording in proposed clause 6.3(2)(dg) and 6.3(3A and (3B) suggests maps would show current DG hosting capacity, and forecasts for both DG and load. A definition of "designed capacity" needs to be added and clarity around whether one or both aspects are included.

Forecast capacity information

Forecast information is an important component for customers, which is why Powerco is currently building a model to enable a level of forecast capacity information to be provided to customers.

Our work on this to date suggests that the 5 year forecast, as described in the draft Code amendment clause 6.3(3B) is not achievable or meaningful for customers. A 5 year estimate is very dependent on the number of access seeker and customer projects that are in the mix (and not confirmed for any 5 year period) and network projects that are identified but not necessary "planned"[5] that far ahead. Our Asset Management Plans describes a 5 year forecast at a level that is appropriate for looking ahead 5 years, including for our own projects. This long-term forecast information should not be required to be mapped, as the result would be a significant range (allowing for variables) offering no value to customers. A more granular level of capacity estimate will occur with an access seeker after initial screening and this is the appropriate way for this information to be conveyed. Increasing the information in our maps to include data out to 5 years would require significant data storage which can drive significant cost into the system with little value to customers.

Expected use of alternatives and prices for those alternatives in forecasts

While we agree that information about plans to use alternatives to network reinforcement should be available to customers, this information is outside the scope of the provision of network visibility/capacity information. Details of network planning and commercial procurement options will be provided through separate platforms and market response, like the Authority has mentioned, and is occurring through OurEnergy's Localflex Marketplace.

[5] "planned circuit upgrades" is the terminology used in proposed clause 6.3(3B)(a)

As there are separate Authority workstreams considering this,[6] we do not support it being included here. This is not information that lends itself to mapping at a circuit level and it varies considerably depending on a number of factors.

Congestion information

The proposals appear to drop the requirement for congestion information in favour of capacity information. In our view, information about congestion on the network and specific committed projects to address congestion (network reinforcement or alternatives), would be of more value to customers than looking 5 years out for either capacity estimates or use of alternatives.

Congestion information is arguably of more use than capacity and to a wider audience, since congestion signals where any existing (or new) connection could potentially leverage enduring value from DER/flex; while capacity information only really serves connecting parties at the time of connection. Congestion information also directly drives network investment (capacity does not).

Some EDBs are producing LV congestion maps and others could likely produce something similar (but potentially not in map form).

Reliability information

SAIDI and SAIFI by definition are system level, averaged, reliability measures, already regulated under Part 4 of the Commerce Act. We do not support this information being included in this proposal which is focused on mapping and data at a feeder level. Not only is there significant overlap with the Commission's ID requirements, as we already disclose worst performing feeders, but we see no value and considerable potential cost[7] if we were to include the reliability information as proposed in clause 6.3(2)(dg)(iv).

We do not see value of SAIDI/SAIFI type information at a feeder level as this measure is not about individual asset failure. Further, this information changes significantly year to year or quarter to quarter as a result of one event. If customer wants to understand reliability at a feeder level, this requires a discussion about the nuances of that network area and events, rather than trying to publish this in a map form or providing it as a data source for the customer to interpret.

Appendix E identifies the gap in current reliability disclosure being "information about reliability of zone and distribution substations". Substation reliability information would be a grouping of the feeder reliability rather than something new so the gap identified is not clear.

As an alternative option, tabulated reliability information could potentially be provided at a substation level, or feeder design classes (tier 1 – 4 of the N buckets) provided to give an indication of security of supply. In order to determine the appropriate form of any reliability information, further consideration is required including an understanding of the purpose of the reliability information that access seekers are looking for.

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[6] For example, the DSO roadmap workstream

[7] For example, costs involved in needing to explain the relative meaning, cause, and effect of this information.

Timing of updates

Our experience is that less frequent updates are acceptable to ensure an appropriate balancing of cost and benefits. There is considerable effort involved in updating capacity maps and data as this is not an automated process, but rather involves considerable manual checking. The Authority has provided no evidence that quarterly updates are necessary.

The time to refresh and re-run the network models behind the maps can take between 3-6 months. In our view, 6 monthly updates should be a minimum, with potentially 12 monthly being adequate. This should be tested further with customers and cost/benefit assessed.

Technical specifications

It is critical that the specifications are focused solely on the outputs of the published form or elements of common language in the published form. The specifications should not be about the inputs such as method for how capacity is calculated.

5. Our summary recommendations

Our summary recommendations are:

1. Pursue a phased approach starting with HV network by September 2027 and focused on network topology and capacity
2. The Authority work with Commerce Commission for a joint solution that places the combined disclosure requirements into one regulation and avoids any overlap or duplication. Our preference is that this sits in the ID determination.
3. Undertake a quantitative analysis of costs and benefits of the preferred option, which may may be a new option following the joint approach in recommendation 2
4. Outline access seeker feedback about what specific information they are looking for, and why, to inform adjustments to the detailed requirements
5. Remove the 5 year forecast
6. Remove alternative non-network solutions and prices
7. Consider including congestion information
8. Remove SAIDI/SAIFI. Consider an alternative tabulated form of security of supply information
9. Amend frequency of updates required to no less than 6 monthly

6. Responses to the Authority's consultation questions

Question	Comments
Q1. Do you agree with our assessment of the current state of the information and capabilities needed to inform network hosting capacity? If not, please explain why.	We agree that the high voltage (HV) network is the priority for improved network information. Information about capacity and constraints on the LV network is of lesser value to customers and a higher cost to achieve. While Powerco has increasingly improved LV visibility through network modelling, procurement of smart meter data & rolling out of LV monitoring, as well as developing capability in quantitative

Question	Comments
	analysis of the LV network, this will take a number of years to mature. We note this is also inconsistent across EDBs. We support progress with initiatives to improve visibility of the HV network, but the LV network has a very different customer base and interest. For the LV network, we support a continued focus on improving streamlining, standardisation and approvals processes for the customers affected by LV network.
Q2. Do you agree the issues identified by the Authority are worthy of attention? If not, please explain why.	We acknowledge that access seekers would prefer more timely network information. The Authority has provided no evidence that access seekers are looking for quarterly updates or why this frequency is considered appropriate. It is not our experience that network information becomes outdated so quickly that it needs to be updated quarterly across a whole network. It seems more likely that annual updates are perceived to be too infrequent. We agree that a map based presentation of network information is more accessible for customers and a useful interface for customer access to more detailed network information. We support regulation as a tool to achieve consistency in outputs and form of data sharing. The current disclosure requirements may not provide access seekers with information in a form where they can visualise capacity easily and access information through one portal. This is a customer accessibility issue, not a lack of information issue. We do not agree that the lack of published capacity maps means distributors could miss opportunities to use non-network solutions leading to higher long term network costs. Distributors do analyse capacity information in assessing investment options. This is core business. The publishing of a map would not benefit this function.
Q3. Do you agree with our assessment that now is the time to regulate for network visibility? If not, when do you consider would be the right time?	For Powerco, transparency and sharing of data is part of delivering our customer commitments. It is about publishing information for the benefit of our customers and access seekers. It also supports developing distribution system operator functionality, and the role of third party providers (eg DER and flex platforms). The Authority suggests (4.17-4.19) that distributors cannot make informed decisions about non-network solutions without the proposals going ahead. This is not the case as distributors do have network constraint information (including some already disclosed) and are making these decisions. However, we do support regulatory clarity on all disclosure requirements for network capacity and constraint, sooner rather than later. This will ensure EDBs can incorporate requirements into existing systems and processes, many of which are already undergoing change or development. A reasonable lead in time is recommended as there will be considerable development work to be done in some cases.

Question	Comments
	Regulatory clarity does not mean putting all the proposals into force quickly. It means a considered and efficient disclosure requirements across both the Authority and the Commission. This may take more time to resolve. We comment further on the regulatory overlap below.
Q4. Do you agree with our assessment of the outcomes that network visibility supports? If not, why not?	We endorse the overall objective of the proposals to improve and standardise publicly available information about high-voltage distribution networks' hosting capacity. Better quality and timely assessments of network hosting capacity support a smarter, more digitalised and data-driven electricity system. Network visibility contributes to a number of outcomes, but primarily offer value to customers and access seekers.
Q5. Do you consider the proposed amendments to Part 6 of the Code would promote the Authority's statutory objective? If not, why not?	Some of the proposals may contribute to the Authority's statutory objective of promoting competition and a reliable supply of electricity for the long-term benefit of consumers. However, some of the requirements would not promote the long-term interests of consumers, particularly where they are inefficient, are not what customers are looking for, and add complexity to existing disclosure requirements. We comment on the individual proposals in section 4 of this submission above.
Q6. Are there any matters you believe are missing from the proposed Code amendment? Please specify.	The consultation paper does not clearly demonstrate that the proposals are aligned with what customers and access seekers are looking for. The Authority has consulted with access seekers over an extended period however the consultation paper does not outline the outcomes of this. We are concerned that the proposals may not accurately reflect the priorities and needs of customers. It is difficult to have confidence in expected benefits, identify gaps, best option to address gaps, or agree on the detailed specifications without this evidence. This further evidence is essential before progressing a Code change. We have commented on specific matters in section 4 of this submission above. One element that is not clear is congestion (vs capacity).
Q7. Is the indicative timeframe for implementing the proposed Code amendment likely to be adequate? If not, please provide information supporting a different timeframe, including identifying cost savings from a later implementation date.	The timing for September 2027 seems reasonable, conditional on the nature of requirements being adjusted as discussed in this submission, and an indication of the likely technical specifications being available well in advance of that.
Q8. What are your views on the proposed approach where detailed information about the data sets captured within the definition of network capacity information would be contained in technical specifications?	This approach is reasonable, and potentially provides for some flexibility and development over time. It is critical that the specifications are focused solely on the outputs of the published form or elements of common language in the published form. The

Question	Comments
	specifications should not be about the inputs such as method for how capacity is calculated.
Q9. Do you consider that the proposal to develop network visibility specifications in consultation with interested parties would be effective? If not, why not?	Yes it will be important for EDBs to be involved in the development of the technical specifications, to ensure they are actually achievable, within scope, and appropriately reflect cost/benefit.
Q.10. Is the proposed timeframe for developing the specifications likely to be sufficient?	A six month timeframe seems more than sufficient if the specifications are focused on form of capacity and topology information only (which is the appropriate scope in our view). A reasonable timeframe is required between finalising the specifications and the requirements coming into effect. Three months should be sufficient, and we assume an indication of draft specifications will occur ahead of that.
Q11. Do you agree with the proposal to start with high-voltage network visibility? If not, please share your perspectives on where best to start.	Yes, we agree. The high voltage network is a focus for EDB network planning due to the investment and customer implications if there is a mismatch between capacity and load. Traditionally network data quality is better across the high voltage network. Large access seekers are generally seeking access to the high voltage network, and it is here that visibility of capacity is more critical. We also agree (para 5.36) that a phased approach focused on HV first, will be lower cost and enable lessons to be learnt for future phases.
Q12. Do you agree with the assumptions the Authority has made? Why/Why not?	The assumptions are reasonable.
Q13. Have we correctly identified the benefits of network visibility?	We agree that publishing capacity information provides value to our customers, or potential customers, who are access seekers. It also provides value to other participants or potential participants in the market such as DER and flexibility providers. Customer benefit is not only about data access but relationships between EDBs and customers, and the engagement about the data. Network capacity data is a tool to support that relationship. The Authority's proposals and reasoning do not provide evidence to justify that the proposals are what access seekers or other participants actually need. The benefits for distributors are overstated in the consultation paper. All EDBs have data to manage their HV network and strive for efficient networks. Good understanding and analysis of that data is key to an EDB role and ultimately consumer benefit in an efficient network. However, regulating a standardised form of data presentation will not benefit EDBs in their planning and efficient use of their own HV network.

Question	Comments
	The stated benefits in the consultation paper relating to LV network is a separate issue, as many EDBs do have lower visibility of the LV network. But not relevant to this HV visibility proposal. For Powerco, transparency and sharing of data is all part of our customer commitments. A key benefit for distributors is the relationship with customers interfacing with the network information. In our changing electricity operating system where orchestration of DER and flex becomes more important, transparency in network constraints will be fundamental so all market participants understand the situation and potential opportunities to respond. Improved network visibility will benefit the relationship between EDBs and flex providers, potentially optimising flex opportunities. Transparency of network information may assist with better informed regulator judgements.
Q14. Do you have any information that might help quantify the value of these benefits? If so, please provide this information.	It is difficult to quantify customer value. For example, it will not necessarily be accounted for in an internal business case looking at cost/benefit for publishing network visibility maps. For Powerco, our customer commitments are a primary driver. As noted in the previous comment, the benefit to distributors primarily relates to the inputs which already exist (use of data) rather than the outputs (presentation of data) that this proposal relates to. So again, not a quantifiable value.
Q15. Have we correctly identified the costs of network visibility?	EDBs looking to implement risk-based investment planning (eg probabilistic) must undertake a digital transformation, supporting big data management, integration, modelling and automation. A capital outlay is inevitable to ensure appropriate systems are in place, but internal efficiencies would likely outweigh this cost. With these foundational digital capabilities in place, it is minimal additional cost or effort to produce capacity and congestion information supporting external stakeholders. The existing systems, and complexity of sharing data, vary amongst EDBs, for example depending on their internal network planning, automation, flexibility engagement and scale. Powerco has shared our approach with other EDBs and has been willing to collaborate to reduce some establishment costs for other EDBs. However the potential cost saving with EDBs collaborating on this work is overstated in the consultation paper. While some engineers' effort may be reduced in picking up a methodology from another EDB, each EDB will still need to build their own infrastructure and data. If the published information requires frequent update (as proposed) this adds cost for resources able to monitor and maintain the data shared. In our view, the cost of quarterly updates of all data

Question	Comments
	outweighs the benefit, and the frequency of updates should be extended to no less than 6 months. The costs and capabilities involved in LV network visibility are vastly different. Should this be progressed as phase 2, the costs will need to be more carefully assessed.
Q16. Do you have any information that might help quantify the costs? If so, please provide this information.	
Q17. Have we correctly identified the regulatory overlaps?	The regulatory overlaps are correctly identified but the assessment inappropriately concludes that overlap and duplication is acceptable. This is not minor regulatory overlap.
Q18. Do you agree with our assessment that there is a net benefit notwithstanding any regulatory overlap? If not, why not?	We do not agree with the assessment of overlaps. There is significant complexity and cost associated with the direct overlap between these proposals and other disclosure requirements. While there may be benefit in the collective regulatory requirements, there is no justification provided for the direct overlap. The Authority must work jointly with the Commission to determine a combined set of disclosure requirements that are regulated under one framework. Our preference is that one set of disclosure requirements is regulated under the Commerce Act ID determination. We have also commented on overlaps in response to question 5.
Q19. Do you have any information that might help quantify the costs and benefits associated with the regularly overlap? If so, please provide this information.	It is difficult to quantify the cost. But it is not just about actual cost, it is about the time and effort associated with complexity, inconsistency and duplicative reporting. There is no benefit in any regulatory overlap.
Q20. Do you agree that the Authority should consider reducing the regulatory overlap as the proposed specifications are developed?	No, it is not just about the technical specifications. The regulatory overlap must be removed, and an approach to improve HV network visibility through one clear set of regulatory requirements, before there is any decision on a Code change. We are disappointed the Authority intends to consult formally with the Commission about reducing overlaps only in developing the final technical specifications. Full engagement with the Commission should occur at the early stage of developing proposals to ensure the result is a combined outcome across the two regulators, not two distinct regimes.
Q21. Do you agree with our assessment that there will be net benefit from the proposed amendments? If not, why not?	We agree that there will be overall benefits for access seekers with improved visibility of network circuit and capacity information (both current and forecast), benefits in EDBs presenting this information in a consistent manner, and benefits in relationships between access seekers and EDBs.

Question	Comments
	We do not agree that benefits outweigh the costs for all aspects of the proposal, nor for the proposed approach to regulate disclosure requirements across multiple, overlapping regulations. We do not agree that a line can be drawn between the benefits of improved network visibility and "lower connection and ongoing lines charges" (para 5.70). Network analysis and optimisation that may reduce or defer forecast investment is not in our view, directly related to publishing network information. While network information and relationships with access seekers are an input to identify opportunities such as integrating DER into distribution networks and planning, those decisions are not reliant on network visibility to external stakeholders. We are concerned that the Authority states "We have not been able to source any quantitative information relating directly to the costs and benefits from greater understanding and transparency of high-voltage network hosting capacity" but then concludes that the benefits exceed the costs (para 5.75 and 5.77). This is not acceptable. A quantitative analysis of the proposal or alternatives must be completed to conclude the best option, and scope of the option, to progress. For example, the consultation paper references the work Sapere completed for costs and benefits of LV network monitoring. A similar exercise could be completed for the Authority's proposals.
Q22. Do you agree the proposed amendment is preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010.	We agree that improved network visibility should be pursued and that regulation is required. The option of amending the ID requirements in the Commerce Act is dismissed without fully explaining how the Authority and the Commission have engaged and determined the best combined approach to related disclosures. It is not reasonable to limit the Commerce Act ID to performance of distributors and state that as the proposals are about improving access to networks they sit within the Code. There is a clear overlap. Improved network visibility (focused on capacity) is an indicator of both distributor performance and customer options for access, amongst other things. We are concerned that dismissing an option to coordinate, and not duplicate, between the Commerce Act ID and the Code, does not meet the objective under section 15 to promote the efficient operation of the electricity industry for the long-term benefit of consumers.
Q23. Do you agree the Authority's proposed amendments comply with section 32 of the Electricity Industry Act?	We agree with regulation for improved network visibility, however for the reasons outlined in our earlier responses, the proposed amendment has not been justified in terms of section 32 of the Act.

Question	Comments
Q24. Do you have any comments on the drafting of the proposed amendment?	In accordance with the comments made above: • The requirement to publish SAIDI and SAIFI for all circuits should be removed (2)(dg)(iv) • Update the frequency of updates to 6 monthly (2)(dj) • Remove the requirement for capacity estimate to include indication of the extent the distributor expects to use network reinforcement and the price that the distributor may be willing to pay for alternatives (3B)(d) and (e).
Please indicate if you wish to be consulted during the development of the technical specifications supporting the proposed Code amendment.	Yes, Powerco would like to be involved as the technical specifications are developed.