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Electricity Authority
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Submitted via email to connection.feedback@ea.govt.nz

Consultation

1. Orion welcomes the opportunity to provide feedback to the Electricity Authority (Authority) on the Issues and consultation paper – Exploring plug-in generation and Code improvements for export limits and connection processes (Paper).

2. Orion owns and operates the electricity distribution infrastructure in central Canterbury, including Ōtautahi Christchurch City and Selwyn District. The network is both rural and urban and extends over 8,000 square kilometres from the Waimakariri River in the north to the Rakaia River in the south; from the Canterbury coast to Arthur's Pass. Orion delivers electricity to more than 233,000 homes and businesses and is New Zealand's third largest Electricity Distribution Business (EDB).

Introduction

3. With an increase in plug-in generation technology being used internationally, and a review underway of the current prohibition notice preventing their use in New Zealand, the Paper considers a range of issues for plug-in generation and its application to the Electricity Industry Participation Code 2010 (Code). The Paper also proposes five Code changes in relation to export limits and small-scale distributed generation (DG).

4. Orion's response to each of the matters discussed in the Paper are detailed in Appendix A and B of this submission. The following focuses on:

    - Orion's concerns in relation to Proposal Two (to prevent distributors from limiting their approved inverter list to smart communicating inverters or mandating flexible and dynamic export limits);
    - Australia's experience with implementing dynamic export limits; and
    - Potential regulatory overlap.

Proposal two

5. The industry has repeatedly engaged with the Authority to demonstrate that flexible and dynamic export limits are able to provide greater system-wide benefits than static limits and should form the direction for industry. Given this, Orion wishes to highlight its support for Vector's submission[1] to the Authority's consultation paper last year, *Maximising benefits from local electricity generation*. It provides an evidenced-based

[1] Vector_vu7Ek7f.pdf

summary of how flexible export limits will be more efficient and equitable.

6. However, while industry has been able to clearly articulate these benefits, Proposal Two will create a direction for industry that is inconsistent with a future of high DG penetration and equitable customer access to electricity networks. Orion is concerned that the proposal will result in:

    - A lack of equity for customer access to electricity networks;
    - Lower overall long-term DG penetration; and
    - A reduction of policy impact if the Authority chooses a different path in future.

7. Orion has already implemented a path which allows customers to access all of the available capacity now while still preparing for a more dynamic future. Our approach (discussed below) appears to have had no material impact on:

    - Customer choice when selecting an inverter; or
    - The installation rate of DG within our network.

Equitable Access to Network Export Capacity

8. The default assignment of a large amount of static capacity (as is the status quo) will maximise export capacity for first movers. The default assignment of a small amount of static capacity or a higher level of dynamic capacity aims to maximise export capacity for *all* customers in the long term. When assigning export limits today we must consider the future and how to maintain equitable access. By not enabling EDBs to mandate flexible and dynamic export limits, it will restrict EDBs ability to consider this.

Lower Overall DG Penetration

9. Figure 1 below represents a time of network constraint (i.e. the middle of the day) and how curtailment would occur across each scenario. It illustrates how customers who come later, after first-movers have used up all the static capacity, will be required to accept all of the curtailment when it occurs. While giving away all the capacity to first movers could be considered a positive to incentivise early DG adoption, Orion suggests that it may reduce overall DG penetration as it will likely reduce uptake rates for second movers. As highlighted in South Australia Power Network's (SAPN) letter to ENA (provided as part of ENA's submission on this Paper), "later customers will receive lower export limits and/or experience greater curtailment because they must operate within the residual hosting capacity remaining after legacy static connections are accounted for".

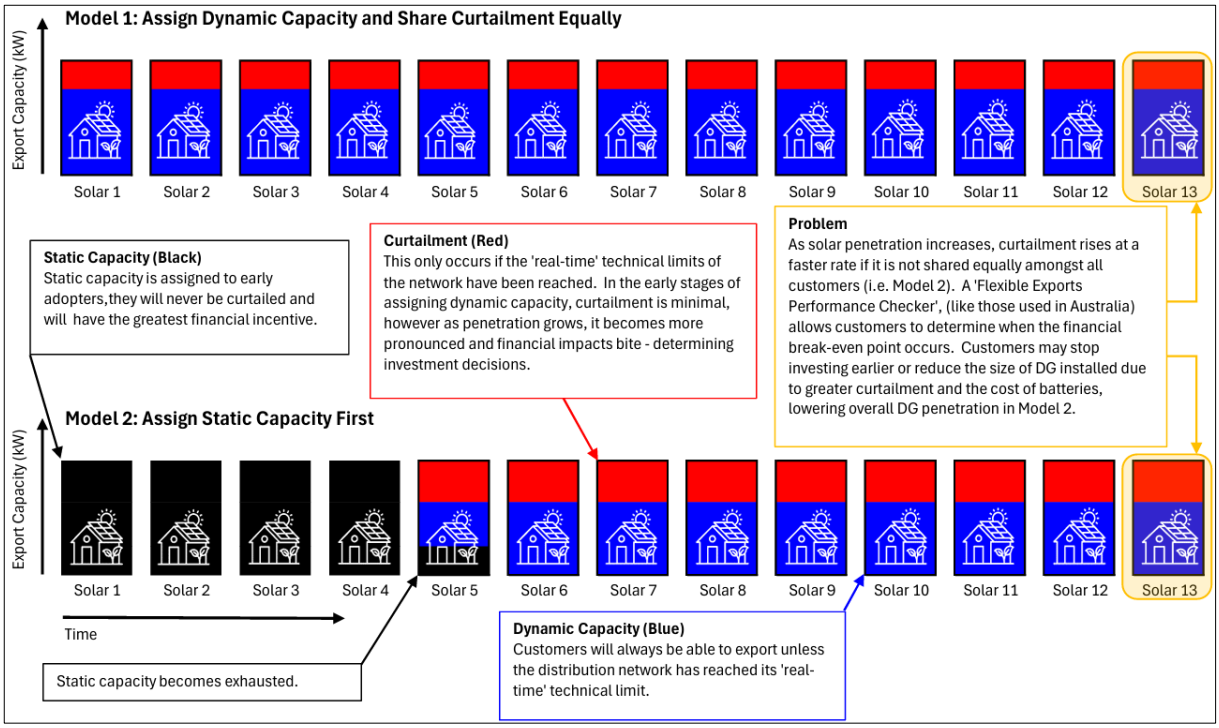


Figure 1: Impact Comparison of Capacity Assignment Models on Long Term Customer DG Adoption.

A reduction of policy impact

10. The Paper indicates at various points that the Authority intends to do future work in this area. Whilst Orion is encouraged by this, it is also concerned that Proposal Two risks predetermining the outcome. It must be acknowledged that locking customers into static capacity arrangements today will adversely impact any dynamic future. As discussed above, it has been made clear to the Authority in previous industry submissions that dynamic arrangements are the future, especially at high penetration rates.

Customer Choice When Selecting an Inverter

11. Anecdotal enquiries with local DG installers have not identified any DG inverters being installed that do not already comply with the communication requirements that would enable open protocols such as Australia's Common Smart Inverter Protocol (CSIP-AU). Given this, it is likely that the proposal to prevent distributors from limiting their approved inverter list to smart communicating inverters would not provide a significant downside to customer choice because most of the inverters are already capable of communicating. Furthermore, in SAPN's letter to ENA they discuss how New Zealand can leverage CSIP-AUS by taking "advantage of capabilities already developed and supported by OEMs, rather than requiring manufacturers to develop and maintain a separate technical implementation for a comparatively small market".

12. Consumer choice is important, but Orion disagrees that it is an argument for mandating high static limits and allowing non-communicating inverters. Orion believes customers should be given a lower static limit and the choice of a dynamic limit, but the inverter

should still be able to communicate in both cases. By restricting EDBs ability to limit the use of non-communicating inverters and mandating dynamic limits, the Authority will be removing choice for some customers with regards to future participation in the energy markets as they will not be able to act according to signals from third parties. This is a significant lost opportunity for consumers putting in systems meant to last 20 years when this type of participation is still emerging.

DG installation rates

13. To avoid the risks discussed above, Orion has implemented a change within its connection agreements for new < 30 kW DG connections to allow capacity to be treated as 'static' until dynamic capability is deployed at which point the pre-allocated capacity will be treated as 'dynamic'. Orion's connections team has observed no material impact on connection applications rates from this requirement. This is because in practice dynamic limits act as static limits until EDBs have dynamic capacity management capability and constraint thresholds on the network are met.

Lessons from Australia

14. Australia is further ahead in the implementation of dynamic and flexible limits due to higher DG penetration resulting from significant subsidies in solar that incentivised rapid adoption of the technology. New Zealand has not had subsidies such as those in Australia and has therefore not experienced the same degree of uptake. However, even without subsidies there have been pockets throughout New Zealand where uptake has been significant. For example, on Orion's network we are seeing subdivisions and retirement villages with 100% solar penetration. Furthermore, it is expected that post the general election in November 2026 there will be some form of subsidy as both major parties are campaigning on incentivising solar[2] [3]. We need to be making decisions on the assumption that New Zealand will experience a significant uptake of solar in the near term.

15. Given this, Orion sees that it will be important to understand lessons learned, avoid mistakes, and understand which approaches have been successful in Australia. In particular, SAPN has worked closely with their regulator to develop a regulatory framework which is supportive of the long-term interests of all customers, and through a combination of subsidies and supportive policies, has achieved a 49% solar penetration for residential rooftop installations. It is important that the Authority carefully considers SAPN's advice in the letter attached to ENA's submission.

Potential for regulatory overlap

16. Orion is encouraged to see that the Authority has engaged with other regulatory agencies, including the Energy Efficiency & Conservation Authority (EECA). There are significant parallels between EECA's recent consultation on the proposed requirements for EV chargers[4] and this Paper. Given this, it may be that a decision on mandating communication capability for inverters should sit with EECA and any Code amendment in relation to this should be deferred until the matter is resolved.

[2] https://www.labour.org.nz/election-policy-pages/solarsaver/
[3] https://www.national.org.nz/solar
[4] https://www.eeca.govt.nz/about/tenders-and-consultations/consultations/proposed-requirements-for-ev-chargers/

Concluding Remarks

17. It appears that the concerns associated with limiting non-communicating inverters and the early assignment of a default export offer of dynamic capacity, which were highlighted in the Paper, do not have a significant impact. However, the impact of Proposal Two could result in long term adverse consequences for the adoption of DG and access to export capacity for those who connect later. Orion does not see that the arguments put forward in the Paper have been sufficiently proven to justify this proposal.

18. Orion's responses to the specific questions in the Paper can be found in Appendix A and B below.

Yours sincerely

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Appendix A - Questions on issues regarding plug-in generation

Questions	Comments
Q1. Do you have any views on our characterisation of plug-in generation?	Orion broadly agrees with the Authority's characterisation of plug-in generation. With the right safety and regulatory guard rails in place, there is an opportunity to deliver system-wide benefits. Despite largely agreeing with the characterisation in the Paper, Orion questions the statement that suggests that "plug-in generation is generally much smaller than permanently fixed DG, with less or little export, so potentially has less impact on network operations." While it may be true that plug-in generation will generally be smaller than permanently fixed DG, that does not mean that it will always be small enough to have less of an impact on network operations. When you look at the example of an apartment building, it could be that the combined impact of multiple small plug-in generators would be significant on network operations even before plug-in generation becomes widespread.
Q2. What network performance requirements should apply to plug-in inverters in New Zealand, and why?	Orion recommends the relevant agencies review the appropriate standards and engage with industry via workshops, or similar, to build up the required information. The various parts of Standard AS/NZS 4777 should be considered as a basis for this work.
Q3. What do you think of the Authority excluding plug-in generation standards from the Code?	While it may not be appropriate for plug-in generator owners to actively engage with the Code in relation to standards (unless they want to be paid for export) it would be important for the Code to continue to reference the relevant standards like it does with AS/NZS 4777. This will ensure consistency and completeness.
Q4. Do you agree that in the absence of a professional intermediary, it will be challenging to obtain a Part 6-type application from a plug-in generation consumer? Why, why not?	Yes, the current Part 6 application processes are likely not well-suited for plug-in generation. The processes are disproportionately administratively heavy, and compliance could be difficult to monitor. However, Part 6 will need to apply for when a plug-in generator (or generators) is exporting above a threshold where further visibility and input from distributors will be needed.
Q5. For a consumer to connect plug-in generation to their premises, should some form of Part 6-type application process be required? Why, why not?	Please see Q6 below.
Q6. If a form of Part 6-type application	Orion sees a registration process will be required. Whilst there may be complexities in setting up and maintaining a

process should be implemented for plug-in generation, do you see that is a notification/registration, or an application that requires distributor approval? Why?	register of plug-in generation, it will be important to do so. Any technology that has the ability to export will need to be considered in network planning and safety measures. A simple register, capturing minimal information at purchase, would be sufficient. This could be similar to car registrations and change of ownership processes. There would be no need to get approval from the distributor if the plug-in generator (or generators) is below a certain size threshold.
Q7. What information should be required if a registration or application for a plug-in generation unit is to be implemented?	It would need to be kept at a minimum and so there wouldn't need to be much provided beyond the ICP and product description.
Q8. Would participants benefit from a registry that captures information about plug-in generation? Why, why not?	Yes. EDBs would benefit from having a better understanding of the adoption rate and penetration of plug in generation within specific areas of the network. This would help to predict load flows and forecasts to inform network planning.
Q9. Should the existing registry be used? Why, why not?	Orion is more concerned that there will be some form of register for plug-in generators, than whether this is through the existing registry or otherwise. However, given the registry already exists and it is intended to be the single source of truth, then the existing registry is likely going to be more appropriate than creating something new.
Q10. Should entering information about plug-in generation be a requirement only after export has been identified at an ICP? Why, why not?	No, the information should be collected and entered at the point of sale (or soon after). Waiting until export has been identified would limit EDBs ability to predict and forecast. Orion appreciates the concerns noted in the Paper that there will be compliance difficulties and that the information may quickly become outdated. However, measures could be put in place to help support information collection, either by requiring registration at purchase or providing a one-off registration rebate or electricity bill credit. Orion sees that the retailer could have a role in helping mitigate some of the issues of any register becoming out of date. For example, when a customer requests a move switch, they could be asked if they are intending to take their plug-in generation with them or conduct an annual survey to ask which of their customers are using plug-in generation. No register will be 100% accurate but a simple one that is reasonably maintained will be sufficient for distributors needs.
Q11. Would the type of information able to be collected at point of sale be sufficient to	Yes, it is likely that the minimal information needed could be collected at point of sale. See response to question 7 for what information should be captured.

meet industry needs? Why, why not?	
Q12. Should the MEPs reverse power indicator be leveraged in identifying potential plug-in generation export? Why, why not?	Yes. Allowing EDBs to identify plug in generation installations through MEP's reverse power indication, combined with a registration process, would provide a fairly robust database.
Q13. Do you agree there is merit in considering whether retailers should be the primary customer interface for plug-in generation registration/notification? Why, why not?	Yes. Retailers maintain the customer relationship and will be responsible for compensating customers if plug-in generation customers want to be paid for export. Having too many points of contact will confuse customers. As discussed in our response to question 10 above, Orion sees that the retailer could have a role in helping to mitigate some of the issues with a register becoming out of date.
Q14. Do you have any other suggestions on how consumers could be informed of Code requirements for plug-in generation?	A short note on the bottom of their electricity bill from the retailer and at the point of sale would likely suffice.
Q15. Should an ability for plug-in generation consumers to receive payment for export be predicated by some form of Part 6 application and approval process? Why, why not?	Approval would not be necessary so long as it was small amounts of export. However, a registration of the device would be important and any plug-in generator (or generators) capable of exporting over a certain size threshold should be predicated by some form of Part 6 application and approval process.
Q16. What measures could be implemented to inform consumers of electricity export at their ICP that is potentially associated with plug-in generation, and what information should this include?	It is likely that retailers, who have the relationship with customers, will be in a better position to respond to this question.
Q17. Should consumers be proactively informed of the potential for plug-in generation to export to a network. If so, which party is best placed to undertake this education role?	This should be done at point of sale. For example, a pamphlet supplied with the equipment at the time of purchase along with a set of supporting online media content (videos, etc) which explains the requirements and why.
Q18. What issues do you see with more UFE in the reconciliation system as a result of	Orion has no comment on potential issues but encourages the Authority to proactively monitor and plan for when UFE reaches a material threshold, which may result from this new technology.

more export from plug-in generation?	
Q19. Do you agree with our view that plug-in generation export with no measurement enabled can be treated as UFE in reconciliation processes, with no need for formal gifting documentation? Would your view change as plug-in generation increases?	This initially may be an appropriate solution, but it is likely a more enduring approach would be needed as uptake increases.
Q20. If gifting documentation were to be required by a plug-in generation consumer, how could this be facilitated?	No comment.
Q21. Are there other genuine issues identified by the reverse power indicator?	No comment.
Q22. Should the requirement on the MEP to notify the retailer via a reverse power indicator be reconsidered, if more plug-in generation is used? Why, why not?	Yes. As discussed in question 12 above, identifying plug-in generation devices through smart meters combined with a registration process would help create a robust register. This will be particular important as plug-in generation becomes more widespread.
Q23. Is there a way for a MEP to filter out plug-in generation related reverse power indicators?	No comment.
Q24. Should Part 10 include an exclusion for requiring import/export metering for plug-in generation? Why, why not?	An exclusion may be appropriate for some instances, but where the plug-in generation is over a certain size or where a customer is wanting to receive payment for export, then Part 10 should apply. It could be linked to a Part 6 application process that would only apply when the DG (including plug-in generation) is over a certain size threshold.
Q25. Should Part 6 clarify requirements for a plug-in generation system being connected alongside approved permanently-fixed DG?	Yes. It will be important to get a full picture of the potential export at a location.
Q26. Should the Code clarify limits on the amount of plug-in generation capacity that can be connected at an ICP (noting any	There will need to be limits on the amount of plug-in generation capacity that can be connected at an ICP and this will need to be made clear to customers as this will be important for safety.

standards developed may define limits)?	This could form part of the Code or sit in a relevant standard. As discussed in question 24 above, it may be that any generation (including plug-in) is captured by Part 6 once it reaches a certain size threshold.
Q27. What sources of information could the Authority use to monitor uptake of plug-in generation and/or any issues that may arise?	Some sources of information that could be considered include: • Assessment of NODS (smart meter data) • Automated image processing of satellite data • Information collected at point of sale • Information from retailers e.g. there could be a new requirement for annual surveys of their customers
Q28. Do you agree with our overall characterisation of the challenges of plug-in generation? Why, why not?	Orion broadly agrees with the challenges outlined in the Paper.
Q29. Which of the challenges outlined in this paper present the most pressing issue for the Authority to address?	While Orion sees that plug-in generation could be a great opportunity to make DG more accessible, it will not come without risk. Safety is a real concern and hence why Orion strongly sees that some form of registration to monitor uptake will be important. We would expect there could be instances where plug in generation continues to export when network hosting capacity limits have already been reached, or when there is an outage, and this needs to be well planned for and appropriately managed.

Appendix B - Questions on distributed generation-related Code change proposals

Questions	Comments
Q30. Do you agree the Code should be amended so the 10kW default export limit also applies to Part 1 applications? Please explain your views.	Orion supports this proposed Code change and the Authority's assessment of its costs and benefits. Orion ensures all the small-scale DG applicants on our network have access to the 10kW default export limit, where available, and there will be no impact to our current processes.
Q31. Do you agree the Code should be amended so that distributors cannot limit their approved inverter lists to only communicating smart inverters or use their COPS to mandate smart inverters or flexible/dynamic export limits? Please explain your views.	No, Orion strongly disagrees with this proposed Code change and does not see that the Authority has sufficiently demonstrated any benefits that outweigh the costs. It is framed in the Paper as a minor clarification and yet it would have wide-reaching, negative implications for the pathway to a flexible and dynamic future. The Authority notes that 'Aside from pilots and initial planning or set-up work, distributors do not yet widely have the technical requirements established (eg, servers configured to communicate with inverters) or capability to roll-out flexible/dynamic limits'. Orion (and other EDBs) have not yet deployed dynamic capacity management capability because deployment of such a system will incur customer cost and deployment is not economic due to the lack of widespread network congestion within the existing network. We would suggest that it is important that customers who connect prior to the deployment of dynamic capacity management should still be assigned a dynamic limit. From a customer's perspective, the connection capacity would appear to be static until dynamic capacity management capability is deployed. Orion's current connection agreement allows for the future implementation of dynamic capacity management and requires that new customer connections be compliant with the Australian Clean Energy Council whitelist for inverters. Using this approach, the majority of new customers can access the full 10 kW of capacity without curtailment (where network capacity permits) and will only be curtailed if distributed energy resources (DER) adoption is sufficient to the point that network congestion occurs, and Orion has deployed dynamic capacity management capability. As illustrated in Figure 1 in the body of this submission, early assignment of static capacity is expected to lower the long-term adoption of DER penetration as curtailment will be assigned entirely to late adopters, who will make an investment decision based on a lower financial return (since the guaranteed financial returns have been assigned to the early adopters and all of the curtailment is assigned to the late adopters). International distribution utilities have

	developed 'curtailment checkers' which allow customers to determine the amount of curtailment that would have occurred at their location within the last 12 months and enable them to make a decision. By contrast, assigning dynamic capacity equally among all connections will allow late adopters to continue to invest as any financial disincentives from curtailment will be shared equally amongst all connections, lowering the impact of curtailment on individual connections. If EDBs cannot adequately prepare for the implementation of dynamic capacity management by allowing for it in current connection agreements, and requiring communicating inverters, it may mean that they are forced to invest earlier than they otherwise would to enable the capability. This is due to the Authority requiring the technology to be implemented before dynamic limits can be offered. Orion has constrained networks today and if we are unable to enter these customers into dynamic agreements then our investment is likely to occur before it might otherwise be prudent. This will also have long term implications for equity and access for customers. Following from this, any customers who connect before dynamic capacity management is implemented may not be set up to participate, especially considering the proposals outlined in this document. It is also important to highlight that Proposal Two may have implications for capability Orion is trying to deliver in line with Distribution System Operation (DSO) expectations. It would impact the ability for resources to participate in flexibility, to operate the system effectively from an optimisation perspective, and will reduce general visibility. Additionally, it's important to keep in mind that any additional emergency response scheme required by the system operator to preserve grid integrity will only be able to utilise communicating inverters. In response to the specific benefits discussed in the Paper, Orion would like to summarise the following: • The Authority envisions the proposal will support the efficient operation of the electricity industry for consumers' long-term benefit by maintaining DG choice. However, Orion would argue that whilst it does provide choice in the short term, if a customer were to install a non-communicating inverter today it would restrict their choice to participate in future energy markets as they will not be able to act according to signals from third parties. The customer would have no option but to replace their inverter before they could participate in future energy markets and switch to dynamic limits. This is a significant lost opportunity as many DG customers do not understand the implications of inverters and the potential for future changes. They are unlikely to understand that a cheaper, non-communicating inverter could bottleneck their system

	in a few years' time. Orion would encourage the Authority to consider SAPN's letter to ENA where they outline the benefits of creating a communications foundation, leveraged off Australia's Common Smart Inverter Protocol for Australia (CSIP-AUS). • The Paper also notes that the proposal will preserve the status quo until further policy work can be undertaken by the Authority. There is a concern that a customer could be "locked" into a particular technology. However, the counterfactual to this is that if the future is dynamic (which has been repeatedly demonstrated as being the most efficient and equitable goal), then a customer is going to be "locked-out" of enjoying those benefits. Those customers would also then "lock-out" other customers from being able to experience the benefits of an efficient, dynamic system. SAPN's letter to ENA also raises concerns about creating inequities between early and later adopters. • The Authority also sees that this proposal would avoid DG customers from incurring additional costs associated with the communications functionality on inverters to support flexibility. As discussed above, non-smart inverters, could lock customers out of future benefits of flexible tariffs, causing higher costs in the long-term. It is also possible that by not allowing EDBs to sufficiently prepare for the implementation of dynamic capacity management, we may need to invest in traditional network build because we will not be able to unlock the potential for more efficient flexibility solutions (given the lack of communicating DER). This again, will come at a cost to the consumer. Finally, Orion would like to highlight its support for the Dynamic Export Connections Working Group and broadly support the principles it is advocating for.
Q32. Do you agree the Code should be amended to allow distributors to 'build in' an extra 10% DG penetration when doing a network study, that may lead to parts of networks qualifying for export limits below 10kW? Please explain your views.	Orion sees that the allowance to 'build in' an extra 10% DG penetration when doing a network study is an improvement to the status quo and would like to thank the Authority for its engagement on this issue. However, Orion remains concerned that the Paper does not characterise the issue fully and the Code change does not go far enough to address it. The Paper makes it clear that this proposal is not intended to address the broader policy question about how network capacity should be allocated as DG penetration increases. Unfortunately, by deferring this question until later there is the risk that the outcome of that work will be predetermined. Already Orion is seeing significant uptake on our network and first movers taking advantage of the high 10kW limit. This is short-sighted when considered

	alongside the proposal to mandate static limits, and we encourage the Authority to strongly consider SAPN's advice in their letter to ENA. They argue that including anticipated growth in DG will support equitable access to network capacity for all customers. However, given the focus of this Paper is on the reduction of the need to conduct unreasonably frequent network assessments, there are two specific concerns Orion has with the proposal. The first relates to the 10% number itself. The Paper doesn't provide any analysis for why the 10% was chosen. From Orion's experience using a 20% buffer, we understand that an arbitrary number is not a strong long-term approach. This is due to the unique characteristics of LV circuits. We would suggest the Authority considers a buffer that shifts based on the type of network being assessed. Key metrics that should impact the buffer are the number of customers on the circuit and the transformer capacity per ICP. For example, on a section of network that feeds a small rural community, you may see only 5 ICPs, so 10% would mean one household installing solar would likely take up the entire capacity and require frequent re-runs of the network study. A higher "buffer" amount would be needed in these circumstances to maintain equitable export access and reduce the need to re-run the network studies for every new connection on these types of network. Of course, the opposite could apply, and there will be instances where 10% is too high. Orion suggests a more appropriate location for this information would be the ELAM/BELAM Guide, which would allow the buffer to evolve through experience rather than Code updates and allow it to be categorised based on network characteristics. Orion's second concern relates to what the 10% is in reference to. The current proposed Code drafting allows for up to 10% on top of the total maximum export power of current DG. This would still mean that across a year network owners would have to frequently re-run their models. The example given in the consultation adds 2kW of total generation to the assessment. Acknowledging that the Authority is setting 10kW default limits where appropriate, this assessment doesn't demonstrate the impact of a single new customer connecting. There are several cases where the capacity of connected DG represents a poor metric for understanding what may connect in the future. Additionally, the location of this connection must still be considered so a separate study will need to be run. Orion recommends that the buffer should instead focus on the number of ICPs. This provides a location-based approach that builds in historic uptake. As an example, a circuit with 100 ICPs on it with 20 DG ICPs would be assumed, under a 10% approach, to have 10 more ICPs with DG. The assessment would then be able to ramp the DG up at these new ICPs until 10kW export is achieved or a network constraint emerges. For rule-based approaches, the

	transformer capacity can be used alongside DG ICP numbers to reach a consistent export limit outcome. This solves both the location and uptake arguments, while providing a suitable-in-most-cases buffer to minimise rerunning network studies. However, Orion also believes 10% is too low as a buffer in some instances (as described above). A circuit with 5 ICPs and 1 DG ICP would, under a capacity-based approach, receive a 1kW buffer (if the DG ICP had a 10kW limit). Under an ICP based approach, 10% would represent 0.5 of a customer. This means no assessment is suitable to understand the impact of the next applicant to applying. In practice, these circuits often supply lifestyle blocks or similar semi-rural properties who have strong incentives and capability to install generation. Orion believes the Authority needs to allow different buffers for different circuit characteristics to ensure they meet the goal of not requiring network operators to re-run studies too often. Additionally, this should sit within the ELAM/BELAM Guidelines so it can be altered as needed without requiring a Code amendment.
Q33. Do you agree that a 10% allowance (as an interim measure) reduces the need for frequent network assessment. If not, what alternative level of allowance or approach should the Authority consider and why?	See response to question 32 above.
Q34. Do you agree the Code should be amended to explicitly require distributors to offer both Part 1A and Part 1 DG application processes? Please explain your views.	Orion supports this proposed Code change and the Authority's assessment of its costs and benefits. Orion currently offers both Part 1A and Part 1 DG application processes and so this change will have no impact on us.
Q35. Do you agree the Code should be amended to make it clear distributors cannot extend timeframes for Part 1A applications, but should not be penalised by the time taken by the applicant to remedy a deficient application? Please explain your views.	Orion supports this proposed Code change and the Authority's assessment of its costs and benefits. While Orion doesn't see that the proposal will change our current practices, if the Authority has seen this as an issue in the wider industry, then it is good to have the timeframes clarified.
Q36. Do you agree with the objectives of the proposed amendments? If not, why not?	For all the proposals, except Proposal Two, we agree with the objectives.

Q37. Do you agree the benefits of the proposed amendments outweigh their costs?	Orion's dis/agreement with the various benefits and costs differ across the proposals and has been described in the individual responses in Q30 – Q35 above.
Q38. Do you have any feedback on the Authority's assessment of the costs and benefits and the balancing of these as set out in this paper, including any evidence of quantified costs and benefits?	Orion's dis/agreement with the various costs and benefits, and the balancing of these, differ across the proposals and has been described in the individual responses in Q30 – Q35 above.
Q39. Do you agree the proposed amendments are 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.	Orion's dis/agreement with the proposed amendments differ across the proposals and has been described in the individual responses in Q30 – Q35 above.
Q40. Do you agree the Authority's proposed amendments comply with section 32(1) of the Act?	No comment.
Q41. Do you have any comments on the drafting of the proposed amendments?	No comment.