3 November 2025

Electricity Authority
PO Box 10041
Wellington 6143

Submitted via email to distribution.feedback@ea.govt.nz

Consultation Paper – Improving visibility of significant distributed generation and load projects- clause 2.16 information notice

Introduction

1. Orion welcomes the opportunity to submit on the consultation paper 'Improving visibility of significant distributed generation and load projects clause 2.16 information notice.[1]
2. Orion owns and operates the electricity distribution infrastructure in central Canterbury, including Ōtautahi Christchurch city and Selwyn District. Our 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. We deliver electricity to more than 233,000 homes and businesses and are New Zealand's third largest Electricity Distribution Business (EDB).
3. We have answered the questions posed by the Electricity Authority (**EA**) in the EA's submission table in Appendix A.

Additional Comments

4. Orion submits concern about the onerous level of detail asked for in the draft notice. We question whether increasing the level of information collected and reported will meet the objective of increasing investment. From our perspective, being required to gather the level of information proposed will disproportionately increase costs and drain resources for EDBs, as well as create further barriers for developers, particularly around commercial sensitivity.
5. We are comfortable with the high-level data categories indicated in paragraph 5.34 of the consultation paper, however the more detailed information set out in Appendix A of the consultation paper (the draft notice) goes well beyond what is anticipated to be published by the EA. This raises concern over regulatory reach and what is reasonably within the control of the EDB. We submit that if the EA proceed with the information requirements, it should focus on gathering the higher-level information set out in paragraph 5.34 without requiring the detailed breakdown set out in Appendix A of the consultation paper.

[1] https://www.ea.govt.nz/documents/8433/Improving_visibility_of_significant_distributed_generation__load_projects_-_co_K9Otf6O.pdf

6. The EA will be aware that EDB will be publishing pipeline information, Transpower will be publishing pipeline information and EA will be publishing pipeline information. There is a risk of data duplication and version management in terms of publication timing and data timing. We question whether there is value in the EA publishing another pipeline.
7. Orion submits that EA decisions (connection process and pricing) and this draft notice are not well sequenced in terms of timing and frequency. This impacts implementation productivity and informs our submission on timings and frequency of the notice data.
8. Orion also submits concern about the information being requested of us and its confidentiality. There is a very real risk that EDBs will not be able to compel information of developers on behalf of the EA, and that there will be a wide interpretation and variability in understanding of what is and isn't confidential.

Concluding remarks

9. This submission is not confidential and can be publicly disclosed.

10. If you have any questions or queries on aspects of this submission which you would like to discuss, please contact us on 03 363 9898.

Yours sincerely,

Dayle Parris
Head of Revenue and Regulation

Appendix A

Format for submissions

Improving visibility of significant distributed generation and load projects - clause 2.16 information notice

Submitter	
Question	Comments
Q1. Do you agree with the Authority's proposal to require monthly provision of information to the Authority, to enable a 'rolling' set of information?	Orion agrees with the proposal to require a 'rolling' set of information, subject to our response to the other questions in this consultation, however we submit in disagreement to monthly provision. Further, there is a misalignment with the timing of the proposed notice commencing in February 2025 and the broader EA connection reform- the load connection processes planned to come into force around April 2027, and publishing of network connections pipeline for large DG and load applications coming into force around October 2026. Further, the frequency of the request is likely to be too often to see step changes in pipeline information. We submit that a staged approach, which recognises the interplay with other Electricity Authority connection reform, would be more appropriate for provision of any clause 2.16 notice information as follows. • Six monthly from 1 April 2026 until April 2027 • Quarterly from April 2027
Q2. Do you agree with the proposed kW/kVA thresholds for inclusion of projects under the proposed notice?	We agree with the thresholds for inclusion of projects of distributed generation >=300kW export and large load >=500kVa however we believe there is a risk of duplication of information with Transpower's pipeline for application sizes 10MW and greater. How does the Electricity Authority anticipate managing this? Also, we seek clarification as to whether the large load threshold excludes greenfields and brownfields (residential and commercial) subdivisions? Each subdivision is built to accommodate multiple individual connections (houses and businesses) that may not eventuate as permanent connections for months or years.
Q3. Do you think smaller projects should be included under the proposed notice?	We do not think smaller projects should be included under the proposed notice.

Q4. Do you have any comments on the proposal to require developers (via distributors) to provide increased information on their generation and load projects?	The Electricity Authority has pointed out at point 5.11 of the consultation that "… the Authority cannot compel those developers directly to provide information." The Electricity Authority goes on to specify on the proposed notice that *"The Authority expects distributors to encourage developers to provide best estimates of all the information required by the notice for all projects, and for distributors to pass on all available information to the Authority."* Orion submits that the proposed notice wording should be amended to read *"~~The Authority expects distributors~~ As far as reasonably practicable and as permitted to by law, distributors should ~~to~~ encourage developers to provide best estimates of as much of ~~all~~ the information required by the notice for all projects, and for distributors to pass on ~~all~~ the available information to the Authority."* An EDB has no more power to compel a developer to provide information than the Authority. In addition, there is information requested of EDBs that would require additional resource to chase up with developers but provides no value between key high level pipeline steps. In particular, Orion disagrees with the requirements to collect the following data: **Developer and location information** • Operator- this is not a matter for the connection process. Operators have their own obligations when it comes to operational matters following commissioning. • ReasonForDelay- some data will be considered commercially sensitive. We note that there could be multiple reasons for delay rather than a single reason. Please also refer to our answer to Q13 • ProjectName- if a unique application ID is provided then this should not be necessary • LocationLatitude and LocationLongitude- could be commercially sensitive. It should be sufficient to have the general location and substation **Project details** • CapacityFactor- this could be difficult to determine at the early stages of application **Project stage (generation and storage only)** We consider the following fields to be commercially sensitive to the developer. It would be onerous to require EDBs, who are not party to the different stages, to collect these. Our focus is on the application progressing, these factors are outside our sphere of control and influence. ○ LandNegotiationCommencedDate ○ LandLegalProceedingsCommencedDate ○ LandCompletedLegalProceedings ○ Contracts

	○ PlanningProcess – if it is not in the public domain, and if the EA then would not publish it, what is the value of its collection? ○ ApplicationSubmitted ○ ConsentGranted ○ ConsentDeclined ○ Appealed ○ AppealDecidedConsentApproved ○ AppealDecidedConsentDeclined ○ ConsentExpiryDate ○ Finance ○ FinalInvestmentDecision
Q5. Do you have any comments on the proposal to require distributors to provide information that might be classified as confidential?	Orion submits that the onus should be on the developer to identify confidentiality matters to the distributor as they are best placed to identify this risk. EDBs would not be able to provide information that breaches a term of contract agreed between us and a customer/developer. We also, refer you to our answer to Q4.
Q6. Do you agree with the Authority's proposal to publish aggregated information, and do you have any comments on how to best maintain confidentiality while providing as much transparency as possible?	Orion agrees with the proposal to publish aggregated information however this does lead us to question the detailed level of information requested in the notice and whether this is necessary.
Q7. Do you agree with the Authority's proposal to aggregate some information provided by distributors to assess the status or stage of projects, and do you have any comments on the breakdown of the proposed stages?	Orion agrees with the proposal to aggregate some information provided by distributors, to assess the status or stage of projects, to report status as committed, actively pursued, and other. However, we do question the detailed level of information requested in the notice and whether this is necessary.
Q8. Do you have any comments on when the data collection should commence?	Orion agrees with the proposal to require a 'rolling' set of information however we submit that there is a misalignment with the timing of the proposed notice commencing in February 2025 and both the load connection processes planned to come into force around April 2027, and publishing of network connections pipeline for large DG and load applications coming into force around October 2026. Further, the frequency of the request is likely to be too often to see step changes in pipeline information. We submit that a staged approach, which recognises the interplay with other EA connection reform, would be more appropriate for provision of any clause 2.16 notice information as follows. • Six monthly from 1 April 2026 until April 2027 • Quarterly from April 2027
Q9. Do you think data collection for DG and load should commence at the same time?	Orion considers that connection process implementation is a prerequisite to effective electronic data collection for DG and load requested in this consultation. Orion therefore submits, subject to our response to Q1 and Q8, that the data collection referred to in this consultation should not commence at the same time- commence DG collection first and follow with load.

Q10. Do you agree the benefits of the proposed clause 2.16 notice outweigh its costs? If not, what area(s) of the Authority's preliminary assessment of benefits and costs do you disagree with?	Orion agrees that collection of the right information has some benefits. However, in terms of whether those benefits outweigh the costs, we do not agree that the level of in-depth information proposed in the draft notice is low cost for EDBs given they require EDBs to collect information not needed for our connection process and which are outside of our control and influence. Therefore, the Authority's position that "8.15. In terms of costs for data, the Authority considers distributors already hold this information as it is required to manage network connections."[2] does not hold true. Please also refer to our response to Question 8 above.
Q11. Do you agree the proposed clause 2.16 notice 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 Act.	Orion agrees the proposed clause 2.16 notice is preferable to the other options subject to our answer to Question 8 above.
Q12. Should the Authority consider further work to monitor and assess the pipeline of new generation and demand?	No
Q13. Do you have any comments on the drafting of the proposed notice?	Orion submits that we are concerned that the draft notice requires "Projects that have more than one type of generation as part of a single project (for example, solar projects with associated battery energy storage systems) should be split into separate projects and given the same name". This adds additional duplication to our processes and systems while potentially adding no value given the intention to aggregate information. Orion submits that the addition of four more options for the ReasonForDelay field in the proposed notice would be useful, if this field is retained. These are: • CONTRACT- negotiation • TECHNICAL- technical design or studies • LAND- land acquisition and negotiation • PROCUREMENT- delivery of equipment We particularly have concerns with the information requested under 'Project stage (generation and storage only)' and we refer you to our response to Q4.

[2] Network connections project (stage one)