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Feedback on open letter – Electricity Distribution Businesses outcomes

Z Energy (*Z*) welcomes the opportunity to respond to the Commerce Commission's (*the Commission*) open letter on improving outcomes from Electricity Distribution Businesses (*EDBs*).

Z's comments focus on our experience as a connection customer seeking electricity distribution connections for public electric vehicle (*EV*) charging infrastructure at select Z sites.

Z supports the Commission's focus on improving EDB performance and delivering better long-term outcomes for consumers. We support a stronger focus on the efficient use of existing network capacity and ensuring EDBs are prepared to accommodate increasing electrification. Our responses to the Commission's questions are set out below.

1. Proposed future state

Z supports a future-state focus on EDBs delivering core network operations well, having strong commercial arrangements in place and building capability for the future. This should include efficient use of existing network capacity, readiness for increasing electrification, and transparent, predictable and customer-focused connection services.

2. Gaps in the Vision statement

Z considers the vision statement should include emphasis on delivery of measurable outcomes for connection customers. In Z's experience, relevant issues affecting performance now, and which are likely to remain important in future, include:

- inconsistent application processes, information requirements and definitions;
- limited transparency on network capacity, connection requirements, timeframes and pricing;
- insufficient early information on likely connection costs; and
- inconsistent access to flexible connections and other non-network solutions.

3. Industry priorities and alignment

Z considers a priority should be better long-term outcomes for current and future consumers through greater consistency, transparency and predictability in how connections are assessed and delivered. This should include involving connection customers in developing and reviewing detailed connection and pricing standards.

3.1 Areas of focus and priority

Z supports the following priorities:

1. Transparent and readily accessible information on network capacity, connection requirements, expected timeframes and pricing methodologies.
2. Reliable early information on likely connection costs, enabling applicants to assess sites and make investment decisions.

3. Common service standards and fit-for-purpose timeframes, including streamlined pathways for straightforward or repeatable connection types.
4. Common application forms, information requirements and definitions, including a clear and consistent definition of large or individually priced connections.
5. Consistent principles for connection and network-upgrade cost allocation, including transparent pioneer or cost-reallocation mechanisms.
6. Consistent pathways for flexible connections, dynamic operating envelopes and other non-network solutions that make better use of available capacity.
7. Transparent reporting against service standards.

3.2 Evaluation of priorities and regulatory interventions

Z believes priorities and proposed interventions should be evaluated against measurable customer outcomes, including consistency, transparency and predictability in connection assessment and delivery. Assessment should also consider whether requirements support efficient use of existing network capacity and timely investment decisions. We do not have any specific feedback on a particular quantification threshold.

4. EDB capability planning, benchmarks and metrics

No specific feedback.

5. Regulatory and legislative support

Z's view is that the Electricity Authority should lead detailed connection and pricing standards, with the Ministry of Business, Innovation and Employment (*MBIE*) and the Commission ensuring that wider incentives and regulatory settings support their delivery. Clear outcomes, accountabilities and implementation milestones are needed across the agencies responsible for electricity distribution regulation. Connection customers, including charge point operators and other large connection customers, should be involved in developing and reviewing those standards to ensure they are fit for purpose.

5.1 Other important enablers

Z considers that important enablers include common service standards; transparent reporting; consistent cost-allocation principles; readily accessible network-capacity information; and consistent pathways for flexible connections, dynamic operating envelopes and other non-network solutions. Local differences should be allowed where technically necessary but should be transparent and clearly justified.

5.2 Areas to deprioritise or reduce regulatory burden

No specific feedback.

6. Feasible timescales

No specific feedback.

6.1 EDB work programmes and accessibility of capabilities or insights

No specific feedback.

7. Smaller EDBs: assessing and quantifying cost impacts

No specific feedback.

8. Barriers to consolidation and standardisation under Part 4

Unnecessary variation in customer-facing connection processes between networks is a barrier to standardisation. Z believes this could be reduced through common application forms, information requirements, definitions and service standards, while retaining transparent and clearly justified local differences where technically necessary. We do not have any specific feedback on barriers to increased consolidation.

9. Alternative approaches to potential regime changes

Detailed connection and pricing standards led by the Electricity Authority may be more impactful and readily implemented, supported by MBIE and the Commission through aligned incentives and regulatory settings. Z's view is that streamlined pathways for straightforward or repeatable connection types, alongside consistent flexible-connection arrangements, should also be considered.

10. Coordination of the Commission's work programme

The work programme should be developed with clear outcomes, accountabilities and implementation milestones across relevant agencies. Connection customers, including charge point operators and other large connection customers, should be directly involved in developing and reviewing standards. Z would be pleased to contribute its practical experience as a connection customer as this work develops.

Please don't hesitate to contact us if you have any questions on our response above.

Ngā mihi,

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