

29 October 2019

Submissions
Electricity Authority
PO Box 10041
Wellington 6143

by email: Part6hosting.submissions@ea.govt.nz

Submission on Consultation paper- Integrating hosting capacity into small-scale distributed generation connections

1. Orion New Zealand Limited (Orion) welcomes the opportunity to comment on the Electricity Authority's (the Authority) consultation paper (the paper) on integrating hosting capacity into small-scale distributed generation connections.
 - a. Our submission covers our response to your specific questions.

Concluding remarks

2. Thank you for the opportunity to make this submission. We do not consider that any part of this submission is confidential. If you have any questions please contact Dayle Parris (Regulatory Manager), DDI 03 363 9874, email dayle.parris@oriongroup.co.nz.

Yours sincerely



Dayle Parris
Regulatory Manager



Appendix B- Response to Questions

Submitter	Orion NZ Limited
Q1. Do you agree the issues identified by the Authority? If not, why not?	Yes, we agree
Q2. Do you agree with the proposals identified by the Authority? If not, why not?	Yes, we agree in principle We note that point 2.43 of the consultation says, “the proposal is to make it clear that, for parts of the network included in the list published in accordance with clause 6.3(2)(da), the distributor has the right to specify maximum export power in its connection and operations standards.” This implies that the right only applies to locations published as either known to be subject to export congestion or expects to become subject to export congestion within the next 12 months. However, the drafting in Appendix A would suggest that a maximum export power threshold can be set for any location (see 6.3(2)(db)) i.e. the maximum export power could be applied to all applications. We prefer the flexibility of the Appendix A drafting and suggest that point 2.43 should have referred to 6.3(2)(db).
Q3. Do you agree with the objectives of the proposed amendment? If not, why not?	Yes, we agree
Q4. Do you agree the benefits of the proposed amendment outweigh its costs? If you don’t agree, please explain your reasons.	Yes, we agree

<p>Q5. 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.</p>	<p>Yes, we agree</p>
<p>Q6. Do you agree the Authority's proposed amendment complies with section 32(1) of the Act? If you don't agree, please explain your reasons.</p>	<p>Yes, we agree</p>
<p>Q7. Do you agree with the drafting of the proposed amendment? If not, why not?</p>	<p>Yes, we agree subject to our comment relating to Q2</p>