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Jo Perry  
Acting Head of Performance and Understanding  
Infrastructure Regulation  
Commerce Commission  
Wellington

Powerco Limited (Powerco) welcomes the opportunity to provide a cross-submission on the Commerce Commission's issues and process paper for the targeted information disclosure review for electricity distribution businesses (EDBs).

A common theme in non-EDB submissions is disclosing more detailed information on network constraints and new investments. Stakeholders are asking EDBs to provide locational constraint information to help them make more efficient connection decisions and identify where there is a value from flexibility resources.

We are already working towards developing the functionality to provide meaningful constraint/investment information. So it isn't news to us. However, this is transformational for the industry. There's massive change needed (skills, processes, documentation, data, models, technology, and cyber security and privacy in the mix). And let's not lose sight that there's a (new) cost to consumers for this increased capability.

Before EDBs proceed with the effort and investment required to deliver locational constraint information, we think the work needs to be done on what's meaningful to inform decisions we or others might make. For example:

- Clarity on "constraint" use cases and interface with existing systems. Are Ake's Flexiforum (see <https://www.araake.co.nz/services-projects/flexforum/>) provides some insight on these.
- Clarity about the role of third parties in relieving the constraint ie, limited value providing information about a constraint which a third-party solution isn't a viable alternative
- Exploring the way information is presented to stakeholders so it's meaningful and consistent across EDBs. For example.
  - What is "user-friendly" is different for each user. So perhaps standards are needed.
  - Maps are often referred to. What they lack is the ability to be interactive or provide data for external analysis. We think most traders would find data interfaces more informative.

We look forward to engaging with the Commission over the coming months to support this review.  
If you have any questions about this submission, please contact Nathan Hill

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**Andrew Kerr**  
Head of Policy, Regulation, and Market