



Chairman: Warren McNabb,

Secretary: David Inch,

5 October 2023

Jacki Jones
Project Manager, Performance and Understanding
Commerce Commission
P O Box 2351
Wellington 6140

By email: infrastructure.regulation@comcom.govt.nz

Dear Jacki,

RE: EDB Targeted ID Review (2024)

The Independent Electricity Generators Association (IEGA) welcomes the opportunity to engage on the Commerce Commission's (Commission) targeted review of the information disclosure requirements on electricity distribution businesses (EDBs).¹

The IEGA represents distributed generation. We are focused on the opportunities for distributed generation to meet incremental growth in electricity demand, operate to meet peak demand, as well as defer or avoid new infrastructure investment by being contracted as a non-network solution by the EDB.

We totally support feedback from EDBs that the Commission's proposal to change the description of 'non-network solutions' to 'non-traditional solutions' requires considerably more thought.

The following extracts highlight the issue. Distributed generation has been and continues to be a non-network solution. But it may not be what the Commission intends as non-traditional.

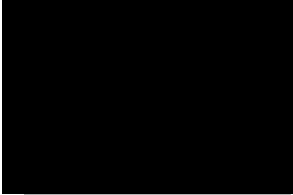
Alpine: "we believe the definition of 'non-traditional solutions' needs further work. The definition incorrectly implies that asset management practices used by EDBs for decades are somewhat new to EDBs and fall outside of proven and commonly used practices. We recommend that the Commission workshop a proposed change to the definition of 'Non-network solutions' further with EDBs and stakeholders before finalising its proposed changes."

¹ The Committee has signed off this submission on behalf of members.

Wellington Electricity: "we believe that the definition non-traditional needs to be improved to capture non-wire solutions that have been offered for years but still offer an alternative to building physical capacity".

Distributed generation owners may be an important stakeholder for any further discussion about this increasingly important aspect of EDB operations and how it is regulated. We look forward to the opportunity to engage on this topic in more detail.

Yours sincerely



Chris Fincham
IEGA Committee