

Implementation Framework for Managing Transmission Connections

NZ Wind Energy Association Comments

September 2022



By email: customer.solutions@transpower.co.nz

Introduction

1. The New Zealand Wind Energy Association (NZWEA) appreciates the opportunity to provide comments on the Implementation Framework for Managing Transmission Connections.
2. The Association also submitted on the Proposed Grid connection Queue Management System consultation in June 2022.
3. NZWEA supports Transpower's recognition of the critical importance of the National Grid and the need for effective and efficient processes and systems to enable the connection of new electricity generation.
4. Clearly considerable thought has gone into developing a process that provides clarity for those wishing to connect to the grid and appropriate information to the wider sector. The recognition of the different development cycles for generation technologies is evidence of a well-considered approach.

Association Comments

5. NZWEA supports the proposed Connection Management System (CMS) but considers it has been developed in a truncated timeframe so it is important to undertake a review in the advised July – September 2023 timeframe.
6. As noted the intent to recognise different technologies / delivery timeframes in assessing applications and not having fixed requirements around landowner agreements / consent approvals is important for longer development timeframe projects such as wind farms.
7. NZWEA supports the proposed pipeline disclosure requirements and the introduction of an application fee for the reasons outlined in the industry workshop presentation.
8. However the nature of the proposed non-refundable fee creates a significant risk the larger the project up to the maximum cost of \$700k. The Association considers that there may be situations, such as regulatory change, which results in well-considered projects that meet Transpower's application requirements no longer being able to be progressed. NZWEA considers a defined criteria should be developed whereby projects are entitled to a refund of unused fees.
9. The Association has concerns that the initial enquiry / concept assessment stages may create bottlenecks in generation customers entering the application stage. NZWEA considers Transpower should ensure appropriate metric reporting is provided to the industry on whether internal service performance targets are being met.

10. The 500MW cut-off limit requires further consideration and parameters should be set which define the scale / complexity criteria for generation connections being out of scope.
11. Transpower should then develop and advise the appropriate process for projects outside of the scope of the CMS.
12. The Association considers that, in addition to the provision of information on the connection pipeline, Transpower should inform the industry of its actual and forecast capacity to support new connections. Information provided should include the extent to which Transpower has allocated resources to meet increased demand so as to support the decarbonisation of the energy sector.

About the NZ Wind Energy Association (NZWEA)

- The NZWEA is an industry association that promotes the development of wind as a reliable, sustainable, clean, and commercially viable energy source
- We aim to fairly represent wind energy to the public, Government, and energy sector
- Our members are involved in the wind energy sector and include electricity generators, wind farm developers, lines companies, turbine manufacturers, consulting organisations and other providers of services to the wind sector
- By being a member of NZWEA you are assisting the development of wind energy in New Zealand and helping to reduce our greenhouse gas emissions to meet climate change targets.

The Association's strategy focuses on three key areas:

- Leveraging NZ's emission reduction imperative to enable the energy transition to renewables, particularly wind energy.
- Optimising wind energy's position and ensure the regulatory environment supports wind farm development.
- Expanding the opportunity for wind energy development to enable community and industrial projects including wind's integration with other technologies.

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