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# Questions from the consultation on TPM Operational Review 2026 Workstream 1

**Question 1** Do you have any comments on the process, timing and/or prioritisation of each of the Operational Review workstreams?

**Question 2** Are there any other matters that we should consider as part of the Operational Review?

**Question 3** Are there any matters we should specifically exclude from the Operational Review?

**Question 4** Do you agree with the proposed amendment - batching of adjustments with a deemed 30 June event date?

**Question 5** Are there any other options to simplify adjustment events timing that we should consider?

**Question 6** Do you support (i) increasing the “large” plant threshold, or (ii) annual IRA updates? Which option, if either, do you prefer and why?

**Question 7** If Transpower proposed raising the threshold for “large plant”, what threshold(s) do you consider would be appropriate?

**Question 8** Are there any other options to address trigger/threshold sensitivity we should consider?

**Question 9** Do you agree with our initial view that the TPM should be amended to:

- remove the SSI adjustment events;
- clarify how Transpower should treat staged projects by adding time and certainty constraints;
- remove all embedded adjustment events and SSI; and/or
- switch to annual review of IRAs and remove most of the adjustment events?

**Question 10** Are there any other options that we should consider to improve adjustment event workability?

**Question 11** While we invite all feedback more generally on the CBA for adjustment event proposals (Appendix B) we are particularly interested in views on the following questions:

- a) What is your view on our approach to the CBA, including its inputs and underlying assumptions. Specifically:
  - I. do you agree that \$5k roughly captures the engagement cost with Transpower leading up to and following an adjustment event?
  - II. when planning to connect to a distribution network, what are your costs to interact with your EDB to provide the information Transpower requires and to obtain/update price estimates for benefit-based investments?
- b) Does the effect adjustment events have on businesses:
  - I. alter or delay investment commitment for embedded generation or offtake plant and, if so, how?
  - II. affect plant design and location decisions for embedded generation or offtake plant and, if so, how?
- c) How does the current threshold of 10MW affect plant design and location decisions and how would this change if the threshold were raised to, say, 25MW?

**Question 12** Do you agree with the proposal to extend the first simple method period to the end of PY2029 or to the end of PY2030 if required?

**Question 13** Are there any other options we should consider for the second simple method period work?

**Question 14** Do you agree with the proposal to clean up the TPM legal text?

**Question 15** Are there any other opportunities to clean up the TPM legal text we have not identified?

**Question 16** Do you agree that disconnection from a shared connection location creates a problem for remaining customers at that location? Do you think this is or could become a material problem?

**Question 17** What other options do you think should be considered? Are these options consistent with the intent of the TPM Guidelines?

**Question 18** Do you think that this is a matter that could/should be addressed through the Operational Review?

**Question 19** Do you agree that anticipatory investment in interconnection assets can create first mover disadvantage problems? Do you think this is or could become a material problem?

**Question 20** What options do you think should be considered? Are these options consistent with the intent of the TPM Guidelines?

**Question 21** Do you agree that this is a matter that could/should be addressed through the Operational Review?

**Question 22** Under the FMD Type 1 mechanism, which Transpower customer(s) should bear the financial risk of second mover(s) not connecting or delaying their connection?

**Question 23** Do you agree that the FMD Type 1 mechanism is not functioning the way it should for connection assets that benefit embedded large plants? Do you think this is or could become a material problem?

**Question 24** What options do you think should be considered? Are these options consistent with the intent of the TPM Guidelines?

**Question 25** Do you think these are matters that could/should be addressed through the Operational Review?

**Question 26** Do you agree with the overall objectives of the proposed TPM Operational Review?

**Question 27** Do you agree it is appropriate to rely on the quantitative analysis of the costs and benefits of the adjustment event proposals and a qualitative evaluation of the costs and benefits of the housekeeping proposals? If not, what information and evidence can you provide, and what methods would you recommend, to quantify the costs and benefits?

**Question 28** Do you agree the benefits of the proposals can reasonably be expected to outweigh their costs?

**Question 29** Do you agree that the preferred options will comply with section 32(1) of the Act?