

VIA Submission on the EECA Distribution Transformers Review

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About VIA

The Imported Motor Vehicle Industry Association Incorporated (“VIA”) is the business association representing the interests of the wider trade involved in importing, preparing, wholesaling, and retailing used vehicles from Japan, the UK, and other jurisdictions.

Our members include importers, wholesalers, Japanese auction companies and exporters, shipping companies, inspection agencies, Key Service Delivery Partners (KSDPs), port companies, compliance shops, service providers to the trade, and retailers.

We provide legal and technical advice to the trade and liaise closely with relevant government departments, including Waka Kotahi (NZTA), the Ministry of Transport, New Zealand Customs Service, the Ministry for Primary Industries (MPI), the Ministry of Consumer Affairs, the Commerce Commission, EECA, and the Ministry for the Environment (MfE).

Contact Information

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Official Information Act 1982

VIA consents to the release of any part of this submission under the Official Information Act 1982.

Privacy Act 1993

VIA has no objection to being identified as the submitter of this document.

Submission on the Consultation Document

Thank you for the opportunity to provide feedback on the “*Consultation on Policy Options to Revise Minimum Energy Performance Standards.*”

While VIA does not have the technical expertise to provide detailed input on specific requirements of this consultation, we would like to highlight several key considerations related to New Zealand’s transition to electric vehicles (EVs):

1. Transformer Capacity and Robustness

The transition to EVs will result in a significant increase in demand for EV charging infrastructure, including high-capacity charging stations. As part of the review, we urge consideration of transformers with sufficient capacity and robustness to support this evolving infrastructure. Specifically, attention should be given to:

- The requirements of **high-capacity Megawatt (and above) EV charging stations.**
 - Future-proofing the energy network to support the increasing energy demands of larger batteries and fast-charging technologies.
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2. Anticipated Growth of the Vehicle Fleet

New Zealand’s fleet size is expected to grow in the coming decades due to population growth. While it is unlikely that the current fleet will be replaced 1:1 with EVs, estimates suggest that we could see a fleet of 3-4 million vehicles within 15–20 years. Transformers must be designed to accommodate this potential scale of growth while maintaining efficiency and reliability.

3. Evolving Battery and Charging Technologies

The ongoing advancements in EV battery capacity and charging technology should also inform the revised standards. With larger battery capacities and faster charging times becoming the norm, transformers will need to support higher energy throughput while ensuring system efficiency and stability.

4. Distributed Charging Patterns

The distribution of EV charging requirements across New Zealand is likely to be highly variable and difficult to model precisely. Charging will occur in a wide range of locations, including:

- **Private homes** (both in urban and rural areas).
- **Public charging stations**, which may see concentrated use in cities, towns, and highways.

Given this, the **entire network must be robust** and adaptable to support a dispersed and dynamic charging landscape. While initial demand may concentrate in larger cities and affluent areas, it is essential to account for equitable access across regions as adoption rates increase.

Conclusion

VIA supports the revision of Minimum Energy Performance Standards to ensure that transformers can meet the energy demands of New Zealand’s transition to EVs. By considering the growing fleet size, advancing technologies, and the decentralized nature of charging infrastructure, EECA can help ensure a reliable and future-proof energy network that supports the nation’s decarbonization goals.

Thank you for the opportunity to comment on this important review. We are happy to engage further or provide additional information if required.

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Technical Support



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