

29 November 2016

Submissions  
Electricity Authority  
P O Box 10041  
Wellington 6143

By email: [submissions@ea.govt.nz](mailto:submissions@ea.govt.nz)

Dear Sir / Madam,

**RE: Consultation Paper – Code Review Programme 2016**

Pioneer Energy (Pioneer) appreciates the opportunity to make submissions on the review by the Electricity Authority (Authority) of non-technical non-controversial changes to the Code.

This submission focuses only on proposal 2016-05 to remove references to the Authority acting reasonably.

Pioneer does not support this proposal. In Pioneer's view there should be no change to the Code to remove requirements to 'act reasonably', publish information within a 'reasonable period of time' or make 'reasonable endeavours'. Further, we do not view this as a non-technical or non-controversial Code change.

These requirements are placed on a number of other industry participants in the Code. It does not appear that the Authority has considered the relevance of these provisions for all market participants. We query whether the proposed changes alter the balance of requirements on the Authority relative to other industry participants.

I would welcome the opportunity to discuss this submission with you.

Yours sincerely



**Fraser Jonker**  
Chief Executive