

Submission by



to the

**Electricity Authority**

on the

**Review of urgent code amendments to the system  
operator's information gathering powers**

5<sup>th</sup> September 2025

# **Review of urgent code amendments to the system operator's information gathering powers**

## **– SUBMISSION BY BUSINESSNZ ENERGY COUNCIL –**

### **General discussion**

1. BusinessNZ Energy Council (BEC)<sup>1</sup> is pleased to have the opportunity to provide feedback on the Electricity Authorities (EAs) consultation titled 'review of urgent code amendments to the system operators information gathering powers.'
2. BEC represents a diverse array of leading energy-sector businesses, government bodies, and research organisations dedicated to creating a sustainable, equitable, and secure energy future.
3. As a brand of BusinessNZ, New Zealand's largest business advocacy organisation, we represent the World Energy Council in New Zealand, aiming to shape better outcomes for our wider energy system both locally and globally.
4. With this consultation the EA is looking to make permanent the urgent code amendments enacted on March 14, 2025, to expand the system operator's information gathering powers – particularly around thermal fuel. This aims at allowing participants to more effectively manage risk, contribute to lower prices and contribute to a more secure electricity supply for consumers.
5. As the EA points out security of supply management requires balancing fuel sources and within New Zealand's highly renewable electricity system thermal fuels play a vital role in providing firming.
6. The circumstance of 2024 where the combination of low hydro levels, low wind generation and diminished gas availability lead to elevated wholesale prices showcased the vulnerabilities within the system.
7. The system operator's role of forecasting security of supply for all aspects of security of supply is vital for preparing for these vulnerabilities but to do this they need accurate and reliable information.
8. Making the code amendments permanent is one way of increasing the accuracy of information, therefore BEC supports the EAs preferred option of making said code amendment permanent. Specifically, the inclusion of mentions to the security of supply forecasting and information policy (SOSFIP) and emergency management policy (EMP) within part 9 of the code. It will allow the system operator to have better access to information, particularly surrounding thermal fuels, which will enable them to make more informed forecasting and greater management of security of supply.

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<sup>1</sup> More about BEC in APPENDIX One

## APPENDIX ONE – BACKGROUND INFORMATION ON THE BUSINESSNZ ENERGY COUNCIL

The [BusinessNZ Energy Council \(BEC\)](#) is a group of leading energy-sector business, government and research organisations taking a leading role in creating a sustainable, equitable and secure energy future.

BEC is a brand of BusinessNZ and represents the [World Energy Council](#) in New Zealand. Together with its members, BEC is shaping the energy agenda for New Zealand and globally.



[BusinessNZ](#) is New Zealand's largest business advocacy body, representing:

- Regional business groups: [EMA](#), [Business Central](#), [Canterbury Employers' Chamber of Commerce](#), and [Business South](#)
- [Major Companies Group](#) of New Zealand's largest businesses
- [Gold Group](#) of medium sized businesses
- [Affiliated Industries Group](#) of national industry associations
- [ExportNZ](#) representing New Zealand exporting enterprises
- [ManufacturingNZ](#) representing New Zealand manufacturing enterprises
- [Sustainable Business Council](#) of enterprises leading sustainable business practice
- [BusinessNZ Energy Council](#) of enterprises leading sustainable energy production and use
- [Buy NZ Made](#) representing producers, retailers, consumers of NZ-made goods

BusinessNZ is able to tap into the views of over 76,000 employers and businesses, ranging from the smallest to the largest and reflecting the make-up of the New Zealand economy.

In addition to advocacy and services for enterprise, BusinessNZ contributes to Government, tripartite working parties and international bodies including the International Labour Organisation ([ILO](#)), the International Organisation of Employers ([IOE](#)) and the Business and Industry Advisory Council ([BIAC](#)) to the Organisation for Economic Cooperation and Development ([OECD](#)).

