



12 August 2026

Sarah Gillies
Chief Executive
Electricity Authority
PO Box 10041
WELLINGTON 6143

Sent via email: consumercareconsultation@ea.govt.nz

Dear Sarah

Code amendment omnibus #7

1. The Major Electricity Users' Group (MEUG) welcomes the opportunity to provide a brief submission on the Electricity Authority's (Authority) consultation paper "*Code amendment omnibus #7: clarification to consumer care and billing refinements and director certification for AUFLS and other amendments*"¹ published on 15 July 2026.
2. MEUG members have been consulted on the approach to this submission. This submission does not contain any confidential information and can be published on the Authority's website unaltered. Members may lodge separate responses.

Do not support proposal to require director certification

3. MEUG does not support the Authority's proposal to amend Part 8 of the Code to require annual director certification of compliance with AUFLS Code requirements. We agree that the "*AUFLS scheme plays a critical role in preventing cascade failure following a significant loss of generation injection or transmission capacity*".² However, we disagree with the Authority's rationale for requiring further compliance from participants.
4. MEUG considers that:
 - The Authority has not demonstrated that current experience with voluntary certification justifies a shift straight to mandatory certification through the Code, rather than targeted engagement with select participants in the first instance.
 - The AUFLS system is highly technical and complex; therefore, it is unclear if directors are in the best position or sufficiently skilled to assess whether technical performance requirements have been met. Directors would likely be reliant on management advice and staff expertise from those already responsible for compliance. This additional step would add additional compliance costs for businesses, without necessarily improving outcomes.

¹ https://www.ea.govt.nz/documents/10498/Code_amendment_omnibus_7_Consultation_Paper.pdf

² Page 3 of the consultation paper.

- This proposed amendment is inconsistent with the approach followed for other services procured from participants. For example, no director certification is required for Interruptible Load (IL) participation in the reserves market.
- The System Operator is the party best placed and resourced to assess compliance with AUFLS, as part of its broader responsibility for power systems security.

Next steps

5. If you have any questions regarding our submission, please contact MEUG on 027 472 7798 or via email at karen@meug.co.nz.

Yours sincerely



Karen Boyes
Major Electricity Users' Group