

6 June 2026

Draft submission – CRP7-005 (joint submission)

Submitter: MainPower New Zealand Limited and Marlborough Lines Limited

Proposal number: CRP7-005 – Clarify that several points of connection may be recorded under a single ICP identifier

Introduction

MainPower New Zealand Limited and Marlborough Lines Limited (together, “the distributors”) appreciate the opportunity to submit on Code Review Programme #7 and, in particular, proposal CRP7-005.

While we acknowledge the Authority’s intent to clarify existing ambiguity and reduce administrative costs, we have significant concerns with the proposal as currently drafted. These concerns relate to safety, operational integrity, and the reliance on ICP identifiers as core network and market identifiers.

Q1. Do you agree the issues identified by the Authority are worthy of attention?

Partially.

We agree there is ambiguity in the current drafting regarding whether an Installation Control Point (ICP) can comprise more than one point of connection. However, we do not consider that the Authority has provided justification for the proposed change and has not made the case for why the proposed change is required. There are alternative solutions to address issues of customers having multiple ICPs on a property and consequently paying multiple fixed daily charges that do not pose the risks that this proposal does.

The proposal raises fundamental questions about how ICP identifiers are used operationally across distribution networks, metering, switching, and safety management processes.

Q2. Do you agree with the objectives of the proposed amendment?

Partially.

We acknowledge the objective of reducing administrative complexity and improving clarity where multiple points of connection relate to a single consumer.

However, we do not consider that this objective sufficiently recognises the critical role ICP identifiers play in safe network operations and system integrity.

ICP identifiers are not purely administrative constructs. They are relied upon by EDBs, retailers, and service providers as a primary identifier of electrical connectivity on the network. Any change that alters the one-to-one relationship between a point of connection and an ICP introduces risk and complexity that must be carefully assessed.

Q3. Do you agree the benefits of the proposed amendment outweigh its costs?

No.

While the proposal identifies administrative efficiencies (such as reduced ICP volumes and simplified billing for consumers), we consider that the potential risks have not been adequately assessed.

Key concerns include:

- **Safety risks:**
Combining multiple physical points of connection under a single ICP may create ambiguity during network operations such as isolation, switching, or disconnection. This increases the risk of inadvertent energisation or disconnection.
- **Operational complexity:**
EDBs rely on ICP identifiers to clearly map physical connectivity. Introducing multi-point ICPs reduces transparency and may complicate outage management, fault response, and planned works.
- **Data and system impacts:**
Registry, billing, and network systems are designed around a clear relationship between ICPs and points of connection. Changes to this structure may introduce downstream complexity that outweighs the claimed efficiencies.

In our view, these risks are material and have not been sufficiently quantified or mitigated.

Q4. Do you agree the proposed amendment is preferable to other options?

No.

We do not agree that the proposed approach is preferable, particularly due to the reliance on a “where practical” test to determine when multiple points of connection may be grouped under a single ICP.

The use of “practicality” as a criterion is problematic because:

- It is inherently subjective and may lead to inconsistent application across distributors.
- It creates uncertainty for participants and reduces regulatory clarity.
- It may introduce compliance risk where different parties interpret “practicality” differently.

From a regulatory design perspective, criteria should be clear, objective, and consistently enforceable.

Q5. Do you agree the Authority’s proposed amendment complies with section 32(1) of the Act?

We have reservations.

While the proposal is intended to promote efficiency, we consider that:

- It may **undermine the reliable operation of the electricity system** by introducing ambiguity in identifying points of connection.
- It may **increase operational risk**, particularly in safety-critical activities such as disconnection and isolation.
- The proposal will also likely require systems and process changes for EDBs to record ICPs with multiple points of connection. This is a cost that will eventually be passed onto consumers.

Given these concerns, we are not satisfied that the proposal clearly promotes the efficient, reliable, and safe operation of the electricity industry as required under section 32(1).

Q6. Do you have any comments on the drafting of the proposed amendment?

Yes.

We have concerns with the drafting in two key areas:

1. Definition of ICP

The proposed amendment to redefine an ICP as “one or more points of connection” (Appendix A, CRP7-005) significantly departs from the current conceptual model of an ICP as a discrete connection point.

This change has wide-ranging implications that are not fully explored in the consultation.

[\[Code Review...tion Paper | PDF\]](#)

“Practicality” threshold

Clause 11.3(4) allows grouping of points of connection where it is “practical in the circumstances”. It would be helpful if the Authority could provide examples of when points of connection would

be grouped for practicality

As noted above, this introduces subjectivity and reduces regulatory certainty. **Q7. Is any part of your submission confidential?**

No.

Additional comments

1. Safety and network integrity

The distributors emphasise that ICP identifiers are a foundational element of network management, including:

- switching and isolation processes
- outage management
- emergency response
- customer disconnections

Any weakening of the one-to-one mapping between physical connection points and ICP identifiers introduces potential safety risks. These risks must be explicitly assessed and mitigated before progressing the proposal.

2. Role of ICP identifiers in industry processes

ICP identifiers are widely used across the electricity sector as a proxy for physical connectivity. The proposed change could create inconsistency between physical reality and registry representation, which may lead to operational and commercial issues.

3. Regulatory process and engagement

We are concerned that a change of this nature is being progressed through an omnibus Code Review Programme.

While the Code Review Programme is intended to package relatively small or technical amendments together, this proposal introduces a **material conceptual change** to how ICPs are defined and used.

In our view:

- Changes of this significance warrant **targeted consultation and engagement with industry**, including distributors, retailers, metering providers, and system operators.
- Progressing such a change within an omnibus consultation is **not consistent with good regulatory practice**, particularly given the potential safety and operational impacts.

We ask that the Authority:

- pause this proposal, and
- undertake further targeted engagement and impact assessment before proceeding.

Closing

MainPower New Zealand Limited and Marlborough Lines Limited appreciate the opportunity to provide feedback and would welcome further engagement on this proposal.

Please contact Sarah Barnes (MainPower New Zealand Limited) or Scott Wilkinson (Marlborough Lines Limited) if you wish to discuss this further.



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