

## Code review programme #7 submission form

Please complete and return this form to provide feedback on Code review programme #7.

Submissions are due by 5.00pm Tuesday 9 June 2026 to [distribution.feedback@ea.govt.nz](mailto:distribution.feedback@ea.govt.nz) with 'Code review programme #7 consultation' in the subject line.

### 1. Code amendment proposals

<b>Submitter</b>	<b>Nathan Joyce</b>
<b>Organisation</b>	<b>Contact Energy</b>

<b>Proposal number</b>	<b>CRP7-004</b> (Extend participant audit to include use of EIEPs)
<b>Questions</b>	<b>Comments</b>
Q1. Do you agree the issue(s) identified by the Authority need attention? Any comments?	<p>No.</p> <p>While we understand the EA's interest in ensuring participants meet their EIEP obligations correctly, we do not believe sufficient evidence or detail has been provided to demonstrate the scale or root cause of the issue.</p> <p>It is currently unclear whether the concerns relate to isolated events or a broader industry-wide problem, or whether any non-compliance is being driven by unclear guidance, differing interpretations, technical limitations, operational constraints, or cost considerations.</p> <p>Without a better understanding of the underlying causes, it is difficult to assess whether additional audit and compliance obligations are justified or proportionate.</p>
Q2. Do you agree with the objectives of the proposed amendment? Any comments?	<p>No.</p> <p>We believe the objectives behind the proposal are well-intentioned, particularly if the EA has identified a genuine and widespread issue requiring attention.</p> <p>We do not agree that the proposal will achieve the stated object of reducing market operational costs.</p> <p>If anything, we believe introducing additional audit requirements is likely to increase costs for participants, rather than reduce them. As further described under Q6.</p>

<p>Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Any comments?</p>	<p>No.</p> <p>We do not believe the proposed amendment's benefits outweigh the additional costs likely to be placed on participants.</p> <p>Introducing further audit requirements would increase compliance, administrative, and audit costs across the industry, including for participants already meeting their EIEP obligations appropriately, while still requiring the same participant engagement and corrective actions to resolve issues when they arise.</p> <p>We also do not believe sufficient evidence has been provided to demonstrate that the issue is widespread or systemic enough to justify broader audit obligations across all participants.</p>
<p>Q4. Do you agree the proposed amendment is preferable to any other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objectives in section 15 of the Electricity Industry Act 2010.</p>	<p>No.</p> <p>We do not believe the proposed amendment is the preferred approach. In our view, many of the issues identified are likely isolated or operational in nature and are already resolved through existing participant engagement and corrective processes.</p> <p>Introducing additional audit requirements is unlikely to prevent technical issues from occurring and would instead increase compliance, administrative, and audit costs for participants.</p> <p>If the EA considers further oversight necessary, we believe a more proportionate approach would be targeted reviews of impacted participants and protocols and additional guidance or clarification where required, rather than introducing broader audit obligations across the industry.</p>
<p>Q5. Do you have any comments on the drafting of the proposed amendment?</p>	<p>We appreciate the intent behind the proposed amendment; however, we are not fully convinced that the current proposal represents the most effective or practical approach to achieving the intended outcome.</p> <p>In our view, there are alternative approaches that could achieve the same objectives in a simpler and more workable manner, while minimising potential operational complexity and unintended impacts and costs to participants.</p>
<p>Q6. Do you have any further comments on the proposal?</p>	<p>If the EA are interested in auditing regulated EIEP's these should be assessed on a protocol by protocol basis. This would require market assessment of if there is actually a problem or issue that requires attention and clearly scoped</p>

	<p>and defined rules. Applying a broad set of audit requirements across all EIEP's feels misdirected as some exchanges are commercially or financially geared (and self regulated by way of robust reconciliation processes already) and some are customer information flows that are purely information passthrough. The information and purposes are too varied to apply a one size fits all approach.</p> <p>We consider it would be more worthwhile and beneficial for all parties if the EA focused on improving the existing core Audit framework and guidelines itself which haven't had a fundamental review or any meaningful changes in over a decade. In a number of cases or areas the framework, scope and scorecard is now out of date, no longer the right areas of focus or are directed towards processes and functions that don't create material market impact, creates ambiguity and non-compliance duplication, requires manual or unwritten manipulation of results and audit frequency outcomes by the EA compliance team that often vary noticeably from the Auditors findings and recommendations. These are just a sample of some of the key themes/challenges participants encounter, however there are many more that could do with once over to ensure the audit processes are working efficiently and the scope is targeting the right areas to reduce overheads and costs for all parties.</p>
<p>Q7. Is any part of your submission confidential? If yes, please explain which part, why it is confidential and provide a publishable replacement (refer paragraphs 1.10 to 1.12 of the consultation paper)</p>	<p>No.</p>

<p><b>Proposal number</b></p>	<p><b>CRP7-005</b> (Clarify that several points of connection may be recorded under a single ICP identifier)</p>
<p><b>Questions</b></p>	<p><b>Comments</b></p>
<p>Q1. Do you agree the issue(s) identified by the Authority need attention? Any comments?</p>	<p>No - We consider allowing multiple ICP's for the same customer (essentially a paperwork electricity supply split) will potentially create unintended safety and administrative issues. Most networks have moved away from multiple points of connection per ICP with only exceptions remaining, largely based on historic setups for these very reasons.</p> <p>Attempting to monitor and manage connection setup arrangements by customer preference is problematic and</p>

	<p>could result in issues when customer arrangements change in future, the most serious being incorrect disconnections or parts of the customers property unknowingly remaining live.</p> <p>Our preference is to retain the simplified single ICP to single connection point model to avoid downstream or customer side paperwork and administrative changes that don't necessarily align with best practice or what is physically wired on site.</p> <p>We appreciate there are sometimes costs associated with splitting or amalgamating/centralising electricity connections, however this is in the best interests of the customer, contractors and industry to ensure that the work is performed correctly, safely and is recorded accurately in systems and the registry. The customer still has options to have an electrician rewire anything downstream of the connection point to meet their requirements or can establish a separate new connection point.</p>
Q2. Do you agree with the objectives of the proposed amendment? Any comments?	No – Cost and practical savings shouldn't come at the cost of safety, accurate information recording and best practise.
Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Any comments?	No – Any benefits would be significantly outweighed by the risks.
Q4. Do you agree the proposed amendment is preferable to any other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objectives in section 15 of the Electricity Industry Act 2010.	No – Any new connection or electrical alteration should be following a single connection point to ICP model.
Q5. Do you have any comments on the drafting of the proposed amendment?	
Q6. Do you have any further comments on the proposal?	
Q7. Is any part of your submission confidential? If yes, please explain which part, why it is confidential and provide a publishable replacement (refer paragraphs 1.10 to 1.12 of the consultation paper)	No

Proposal number	CRP7-008 ( Process for updating the registry and reducing distribution charges for non-supply )
Questions	Comments
<p>Q1. Do you agree the issue(s) identified by the Authority need attention? Any comments?</p>	<p>Yes.</p> <p>We generally agree there is an issue regarding the treatment of non-supply situations and related distribution charges, and that greater industry consistency would be beneficial.</p> <p>However, we are concerned that the proposed amendment allows too much operational discretion for distributors, which could increase complexity, reduce opportunities for automation, and create additional costs for retailers. In many cases, the administrative effort required to process these credits may outweigh the value of the credit itself.</p> <p>We are also concerned that differing distributor approaches could result in inconsistent customer outcomes across networks.</p>
<p>Q2. Do you agree with the objectives of the proposed amendment? Any comments?</p>	<p>Yes.</p> <p>We support the overall objective of improving the process for managing non-supply situations and ensuring customers are appropriately credited where distribution charges should not apply.</p> <p>We also support objectives that improve transparency and reduce unnecessary disputes or uncertainty between participants.</p> <p>However, we believe the amendment should place greater emphasis on operational consistency and standardisation across distributors. Any solution should minimise unnecessary manual processing and support automation wherever possible.</p> <p>We also believe Proposed Amendment 2 should be strengthened by changing the wording from “allow distributors” to “require distributors” where obligations are intended to apply consistently across all distributors.</p>
<p>Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Any comments?</p>	<p>No, not entirely in its current form.</p> <p>While we acknowledge the benefits of creating clearer processes for non-supply situations, we believe the proposal could create significant operational and</p>

	<p>implementation costs for retailers due to the level of discretion available to distributors.</p> <p>Multiple distributor-specific approaches reduce opportunities for automation, increase manual processing and reconciliation requirements, and may require additional system development. In many cases, the cost of processing the credit may exceed the value of the credit itself.</p> <p>We are also concerned that differing approaches may result in inconsistent customer outcomes across networks.</p>
<p>Q4. Do you agree the proposed amendment is preferable to any other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objectives in section 15 of the Electricity Industry Act 2010.</p>	<p>We support the intent of the proposed amendments, however we do not believe the current range of distributor approaches is operating efficiently in practice. While the proposal may reduce some rework for distributors, it risks increasing complexity, manual effort, and costs for retailers, while also potentially increasing the number of discretionary approaches used across the industry.</p> <p>Currently, distributors are using a range of different processes to manage non-supply credits, creating reconciliation challenges, compliance risk, and reduced opportunities for automation. In many cases, the effort required to process these credits can outweigh the value of the credit itself and may also result in inconsistent customer outcomes.</p> <p>While some level of distributor discretion may be appropriate, we believe greater standardisation is needed to support efficient processing, minimise manual effort, and avoid unnecessary system changes for retailers.</p>
<p>Q5. Do you have any comments on the drafting of the proposed amendment?</p>	<p>Yes.</p> <p>We recommend:</p> <ul style="list-style-type: none"> <li>• replacing “allow distributors” with “require distributors” where the status is required to be updated back to active;</li> <li>• providing clearer guidance around how distributors should implement and communicate credits;</li> <li>• limiting operational discretion to standardised process options; and</li> <li>• clarifying expected customer outcomes to improve consistency across networks.</li> </ul> <p>Additional clarity and greater standardisation would help reduce ambiguity, minimise implementation costs, and improve consistency across networks and customer outcomes.</p>

<p>Q6. Do you have any further comments on the proposal?</p>	<p>We are seeing a growing number of discretionary operational approaches being used across distributor processes. While some flexibility may be appropriate, excessive discretion increases complexity, costs, and inconsistency for retailers and customers.</p> <p>Greater industry standardisation should be prioritised to support automation, efficient processing, and more consistent market outcomes.</p>
<p>Q7. Is any part of your submission confidential? If yes, please explain which part, why it is confidential and provide a publishable replacement (refer paragraphs 1.10 to 1.12 of the consultation paper)</p>	

## 2. Technical and non-controversial amendments

<b>Submitter</b>	
<b>Organisation</b>	
<b>Row number</b>	

<b>Questions</b>	<b>Comments</b>
<p>Q1. Do you agree the issue(s) identified by the Authority need attention? Any comments?</p>	
<p>Q2. Do you agree with the objectives of the proposed amendment? Any comments?</p>	
<p>Q3. Is any part of your submission confidential? If yes, please explain which part, why it is confidential and provide a publishable replacement (refer paragraphs 1.10 to 1.12 of the consultation paper)</p>	