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By email: distribution.feedback@ea.govt.nz

Submission on *Code Review Programme number 7*

Introduction

Network Tasman Limited (Network Tasman) thanks the Electricity Authority Te Mana Hiko (the Authority) for the opportunity to submit on the May 2026 consultation paper *Code Review Programme number 7*.

The Code Review Programme provides a valuable mechanism for addressing accumulated gaps and ambiguities in the Code, and we support the Authority's use of this process to maintain the Code as a clear and workable set of industry rules.

This submission addresses five of the fourteen proposals in CRP7: proposals 001, 004, 005, 008, and 009. We have focused our comments on those proposals that are most directly relevant to our operations or where we consider the Authority's approach could be improved. We do not comment on the remaining proposals.

CRP7-001: Align terminology for maximum export power

Network Tasman agrees with this proposal. Consistent use of defined terms across the Code reduces ambiguity and lowers compliance costs for participants. Aligning definitions are typically straightforward improvements that will make the Code easier to interpret and apply.

We support the Authority's intention to instruct the registry manager to update the Registry Functional Specification and related guidelines to align with this terminology.

We also submit that the Authority should update its *How to enter distributed generation data in the registry: User guide* to ensure it references the correct terminology and to bring it up-to-date with the current processes for entering distributed generation into the registry as it is currently out-of-date.

CRP7-004: Extend participant audit to include use of EIEPs

Network Tasman supports this proposal. In our experience, inconsistent and non-compliant use of EIEPs creates unnecessary operational burden that requires manual intervention to identify and resolve errors that should not occur. Extending participant audits to cover EIEP processes and procedures will introduce a meaningful accountability mechanism that the

Code currently lacks. We consider that the discipline imposed by regular auditing will improve the accuracy and timeliness of information exchanged across the industry, reducing costs for all participants.

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

Network Tasman strongly disagrees with this proposal and does not consider the problem definition to be well founded.

The consultation paper states that the Code's definition of ICP as "a point of connection" can be read as limiting an ICP to a single point of connection, while also noting the Part 1 proviso that definitions apply "unless the context otherwise requires".

Network Tasman does not consider there to be genuine ambiguity here, nor does the Authority highlight any ambiguity, other than to assert it exists.

Similarly, Network Tasman does not see any contextual basis for using the "unless the context otherwise requires" proviso to read the singular as including the plural.

The consultation paper goes on to Network Tasman submits that the Authority has not adequately explained the practical issues that arise from consumers receiving separate retail bills for multiple points of connection, nor demonstrated that these issues are a result of market failure.

Network Tasman submits that in this scenario there is no market failure.

Retailers have complete discretion in how they package the costs of electricity supply to their customers. They are not required to faithfully pass on distributors lines charges in the structure or level they are incurred. This discretion is a core pillar of a competitive retail market.

Retailers already have the operational flexibility to bundle multiple distinct services — including electricity, gas, broadband, and mobile — into a single invoice. We are not aware of any Code constraint that prevents retailers from consolidating distribution charges across multiple ICPs into a single bill where consumers wish this.

Network Tasman is also concerned about the practical consequences of permitting multiple points of connection under a single ICP identifier. The proposal would add complexity to registry management, metering obligations, reconciliation, billing and most importantly network visibility and operations. The practicality threshold in proposed clause 11.3(4) provides insufficient guidance on when grouping is appropriate, and is likely to lead to inconsistent application across distributors.

In Network Tasman's view, this proposal is a regulatory intervention directed at distributors to solve a problem that already has a solution.

CRP7-008: Process for updating the registry and reducing distribution charges for non-supply

Network Tasman agrees with this proposal. The current clause 9.10(b) of the Default Distributor Agreement template imposes rigid timing and methodology requirements that do not align well with the billing systems used by some distributors. The requirement to apply charge reductions only via specific daily zero-billed quantities, and only in the next billing cycle, can result in manual reworking that adds cost without delivering any additional benefit to consumers or traders. The proposed amendments provide sensible flexibility.

CRP7-009: Enable faster implementation of distributor price codes

Network Tasman supports the intent of this proposal but considers the requirement for end-consumer consent to be unnecessary and poorly targeted.

The two-month lead time in clause 23(3) exists to give retailers sufficient time to update their billing systems before a new distributor price code takes effect. That is a matter falls entirely within the retailer-distributor relationship. If a retailer is willing and able to implement a new price code sooner, the retailer's consent should be sufficient — there is no need to also require consent from the retailer's customer.

Consumers in the retail market are customers of their retailer, not of the distributor. There is no regulatory requirement for retailers to pass through distributor price changes to consumers on any particular basis. How and whether a retailer passes on changes to its customers is governed by the retailer-consumer agreement, which the parties can vary at any time. The Authority does not need to step into that commercial relationship by requiring consumer consent as a precondition for a distributor price code to take effect. If the retailer cannot secure consent from its customers to pass on any changes to distributor prices, it may disagree to a shorter notice period with the distributor. The requirement for customer consent unnecessarily regulated an otherwise unregulated relationship between the customer and the retailer.

Network Tasman recommends the Authority amend the proposed subclause (6) to require only the written consent of the relevant trader, not the consumer, as a condition for early implementation of a distributor price code.