



Electricity Authority
Wellington

9 June 2026

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

Code Review Programme #7

Transpower welcomes the opportunity to submit on the Electricity Authority's (Authority's) consultation *Code Review Programme #7*, published 12 May 2026.

This submission responds in the main to the proposed change CRP7-012 to clarify responsibilities under grid connections/disconnections and electrical connection/disconnection processes. We support #12 being progressed to correct for inaccurate drafting and for which Transpower needed to apply for exemption.

We also address the wider context of the code change proposed in CRP7-006 focusing on meter certification processes that require an adequate load to be drawn for testing purposes.

We have no comments on the technical and non-controversial changes identified in this consultation.

CRP7-012 Amend clauses 10.29B and 10.29C

Clauses 10.29B and clause 10.29C govern, respectively, the circumstances in which

- the grid owner may *electrically connect* a point of connection to the grid and
- the grid owner may *disconnect*, or *electrically disconnect*, a point of connection to the grid.

Grid connection and disconnection is a different concept from grid electrical connection and electrical disconnection. Grid connection is the commissioning process for making a connection point able to be electrically connected. Electrical connection/disconnection is opening and closing the switch(es) that connects the customer to the grid. A grid disconnection is permanent removal of the equipment that enables electricity to flow.

We support the policy intent for the proposed code change to ensure that there is a responsible party (a trader) for settlement of submission information¹ for the electricity conveyed through a grid point of connection once energised. Submission information under Part 15 applies only to generators and the grid owner.

¹ **submission information** means **volume information** aggregated in accordance with clause 8 of Schedule 15.3 (and includes, if relevant, any **profile** shape or control times associated with a **profile**)

For both GIPs and GXPs we agree that the grid owner needs to have confirmation by the connected party that there is a trader responsible for settling the volumes identified through submission information.

[Views on the proposed drafting for clause 10.29B and clause 10.29C](#)

Clause 10.29B. We support that the clause now conveys that the grid owner can permit a Designated Transmission Customer (DTC) to *electrically connect* for operational purposes and only with contractual agreement. Permitting electrical connection (and disconnection) for these operational needs means that the grid owner does not need to be involved in a customer's everyday asset management decisions.

However, we consider the proposed drafting needs revision to distinguish between

- grid connected generators that provide submission information under part 15 (clause 15.11)
- for direct connects and EDBs, that these parties need to confirm there are traders for settlement, but those traders do not provide submission information (the grid owner does so under clause 15.9)

We suggest drafting as below:

10.29B Grid owner or designated transmission customer may electrically connect a point of connection to the grid

...

(2) (a) A grid owner may only electrically connect a point of connection under subclause (1) if in the case of the electrical connection of—

- (i) a direct consumer, the grid owner has received written confirmation from the direct consumer that there is a trader identified as responsible for settlement of the electricity conveyed at the point of connection from the time of electrical connection
- (ii) a local network, the grid owner has received written confirmation from the distributor for that local network that one or more traders are identified as responsible for settlement of the electricity conveyed at the point of connection from the time of electrical connection
- (iii) a grid connected generator, the grid owner has received written confirmation from the grid connected generator that there is a trader identified as responsible under 15 for the delivery of submission information for the electricity conveyed at the point of connection from the time of electrical connection

Clause 10.29C. The proposed clause title for 10.29C conveys that a DTC is now permitted to both electrically disconnect AND disconnect. We consider the title should not include the term "designated transmission customer." The title misleads in conveying that all DTCs can *disconnect* from the grid.

A DTC may electrically disconnect (open a switch) for operational reasons subject to agreement with the grid owner (as above), but the responsibility of grid disconnection - removing the ability for a DTC to be electrically connected to the grid - rests with the grid owner.

We suggest revised code drafting for 10.29C below.

10.29C Grid owner ~~or designated transmission customer~~ may disconnect or electrically disconnect a point of connection to the grid

- (1) only a grid owner can disconnect a point of connection to the grid
- (2) a grid owner or designated transmission customer may electrically disconnect a point of connection to the grid
- (a) A grid owner may disconnect or electrically disconnect a point of connection to the grid that it owns or operates only if the action is required for the grid owner to meet its obligations
- (i) under an enactment, including this Code; or
 - (ii) under its contract transmission agreement with the party designated transmission customer
- (b) A designated transmission customer may electrically disconnect a point of connection to the grid only when it is permitted to do so under its transmission agreement with the grid owner.

We would be happy to meet to discuss further this specific code change to ensure it is accurate and can be complied with.

[CRP7-006 Require action when insufficient load to certify metering](#)

The code change proposes to require an MEP and retailer to disconnect an ICP supply if (after repeat visits) access cannot be arranged at times the metering installation will have sufficient load for certification. Our interest is to be clear that the proposed code should not apply to the grid owner with its high-voltage meters at GXPS and GIPs.

- We suggest that under Schedule 10.7, the sub-clauses proposed from clause 14 (7) through to 14 (12) should be prefixed with “in the case of an ICP”...

On the subject of prevailing load test, we remind the Authority that in May 2022 Transpower as grid owner submitted a code amendment request (CAR) to address the issue that a prevailing load test using a working standard is an unsuitable process for certifying high voltage meters. Our proposal sought an alternative certification process and would remove the issue of insufficient load to perform a prevailing load test. Our CAR has not yet been progressed.

We would like to reiterate our previous suggestions that, for bundled code amendments, (such as code reviews or omnibus routes), it would be helpful if the source of each proposed amendment was clearly identified —whether initiated by the Authority through its compliance monitoring or policy processes, or by participants operating under the Code. In particular, greater transparency regarding participant-initiated requests would support confidence that such proposals are being thoughtfully considered and afforded due attention.

In the appendix we respond to the questions for CRP7-6 and CRP7-12.

Yours sincerely

Micky Cave

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Strategy and Regulation

Appendix

Submitter	Transpower NZ Ltd (Grid Owner)
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Questions	Comments
Q1. Do you agree the issue(s) identified by the Authority need attention? Any comments?	Yes.
Q2. Do you agree with the objectives of the proposed amendment? Any comments?	Yes.
Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Any comments?	Yes.
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.	Yes.
Q5. Do you have any comments on the drafting of the proposed amendment?	Yes. The drafting is not accurate. It needs to distinguish between • grid connected generators that as traders both settle and provide submission information under part 15 (15.11) • for direct connects and EDBs, that these parties need to confirm there are traders for settlement, but those traders do not provide submission information (the grid owner does so under clause 15.9). Please see the main body of this submission for suggested redrafting.
Q6. Do you have any further comments on the proposal?	We would be happy to meet to discuss further this specific code change to ensure it is accurate and can be complied with
Q7. Is any part of your submission confidential?	No part of this submission is confidential.

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Questions	Comments
Q1. Do you agree the issue(s) identified by the Authority need attention? Any comments?	Yes. However, while the issue can apply to the grid owner (insufficient load for a prevailing load test), the solution of eventual disconnection is specific to ICPs and would not be appropriate for high voltage grid connections.
Q2. Do you agree with the objectives of the proposed amendment? Any comments?	Yes.
Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Any comments?	Yes.
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.	Yes.
Q5. Do you have any comments on the drafting of the proposed amendment?	Yes. We suggest that under Schedule 10.7, the sub-clauses proposed from clause 14 (7) through to 14 (12) should be prefixed with "in the case of an ICP"...
Q6. Do you have any further comments on the proposal?	Yes. We would appreciate the Authority considering the grid owner's 2022 code amendment request for an alternative approach to high-voltage meter certification, because a prevailing load test using a working standard is an unsuitable process for certifying high voltage meters.
Q7. Is any part of your submission confidential?	No part of this submission is confidential.