

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 with 'Code review programme #7 consultation' in the subject line.

1. Code amendment proposals

Submitter	Kerry Watson
Organisation	Waipā Networks
Proposal number	CRP7-004

Questions	Comments
Q1. Do you agree the issue(s) identified by the Authority need attention? Any comments?	Yes. EIEP files are an important component of market functionality and the Authority should be able to have confidence these are being used correctly.
Q2. Do you agree with the objectives of the proposed amendment? Any comments?	Yes. Waipā Networks believes auditing EIEP application and processes will lead to a reduction in errors and inconsistencies.
Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Any comments?	Yes. Waipā Networks believes the benefits of a reduction in errors and inconsistent approaches would likely outweigh the minor additional cost of having these audited.
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. Waipā Networks believes it is preferable to the status quo.
Q5. Do you have any comments on the drafting of the proposed amendment?	No
Q6. Do you have any further comments on the proposal?	No
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 2.5 to 2.6 of the consultation paper)	No.

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1. Code amendment proposals

Submitter	Kerry Watson
Organisation	Waipā Networks
Proposal number	CRP7-005

Questions	Comments
Q1. Do you agree the issue(s) identified by the Authority need attention? Any comments?	Yes. Although instances of multiple connections for a single ICP are uncommon on the Waipā Networks network, we have traditionally sought agreement with the Retailer before approving these due to the uncertainty in the current Code wording.
Q2. Do you agree with the objectives of the proposed amendment? Any comments?	Yes. We agree that the proposal could reduce operational costs through providing clarity.
Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Any comments?	Yes. Noting however our comments in Q5.
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. We believe it is better than the status quo in terms of clarity around ICP connections.
Q5. Do you have any comments on the drafting of the proposed amendment?	Waipā Networks believes the proposed amendment to 11.3 (4) could be better worded, by having the criteria relate to a Consumer Installation rather than a Consumer. This would avoid scenarios where a consumer may request to consolidate ICPs for multiple properties to reduce their fixed daily charge, for example. We also believe that if the Code is being updated then clarity should also be provided around ICPs/Points of Connection relating to Distributed Unmetered Load. Our proposed alternative wording is: (4) A single ICP identifier may be created for more than one point of connection if:

	<p>(a) each point of connection relates to a single consumer installation; or</p> <p>(b) the points of connection relate to an instance of distributed unmetered load, and</p> <p>(c) it is practical in the circumstances.</p>
Q6. Do you have any further comments on the proposal?	No.
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 2.5 to 2.6 of the consultation paper)	No.

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1. Code amendment proposals

Submitter	Kerry Watson
Organisation	Waipā Networks
Proposal number	CRP7-013

Questions	Comments
Q1. Do you agree the issue(s) identified by the Authority need attention? Any comments?	Yes. Waipā Networks already requires that access to isolate an ICP be demonstrated before approval of a new connection. Having this specifically required in the Code would reinforce the rationale for this practice particularly when we occasionally are challenged by a consumer, builder or electrician as to its importance.
Q2. Do you agree with the objectives of the proposed amendment? Any comments?	Yes. Waipā Networks believes the proposal could reduce inefficiencies from the process of disconnecting ICPs by promoting reasonable access.
Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Any comments?	Yes. In Waipā Networks case, there are no additional costs as we already practice this approach.
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. We believe the proposal is preferable to the status quo.
Q5. Do you have any comments on the drafting of the proposed amendment?	It could be beneficial for the drafting to outline typical real-world access scenarios. For example: “(c) for ICPs created after [date], there is reasonable access to enable the ICP to be electrically disconnected and one of the following applies — (i) the point of connection is located in road reserve or similar; or

	<p>(iii) the ICP isolation point is in an unobstructed location at the premises at which the electricity conveyed from the ICP is consumed; or</p> <p>(ii) the ICP isolation point is located in a shared meter room, locked service cupboard, adjacent property or other location for which the applicant has demonstrated to the satisfaction of the Distributor and Retailer that unobstructed right of access has been provided.”</p>
<p>Q6. Do you have any further comments on the proposal?</p>	<p>No.</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 2.5 to 2.6 of the consultation paper)</p>	<p>No.</p>