



9 June 2026

Electricity Authority
PO Box 10041
Wellington 6143

Via email: 16 June 2026

Consultation Paper – Code Review Programme number 7

WEL Networks appreciates the opportunity to provide feedback on the above consultation.

WEL Networks (WEL) is New Zealand’s sixth largest electricity distribution company and is 100% owned by our community through our sole shareholder WEL Energy Trust. Our guiding statement of strategic intent is to be leading Waikato’s energy future, and we work to ensure that our customers have access to reliable, affordable, and environmentally sustainable energy.

Full responses to Code Review Programme items accompany this letter, but we make comments on the following:

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

WEL agrees with this change, but we suggest the Code drafting should specify *mandated* EIEPs to avoid the possibility of participants being penalised in audits for not using unrequired EIEPs.

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

We disagree that there is ‘uncertainty under the Code’ in that an ICP relates to a single point of connection, and as such this is not a ‘clarification’ but a major change.

The proposal is changing the base understanding on which the industry is built on (from the physical connection through to the retail consumer), in that there is a one to one relationship between a physical connection point and its ICP identifier. There have been historical instances where multiple connections were assigned a single ICP, but distribution companies have spent much time and resources in correcting these over the years. If the Authority truly wants to pursue such a fundamental change, then it should be presented as a stand-alone, fully investigated consultation.

This proposal as presented should be rejected outright.

Should you require clarification on any part of this submission, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in blue ink that reads 'Andrew Maseyk'.

Andrew Maseyk

Regulatory Specialist

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Code review programme #7 submission form

Submitter	Andrew Maseyk
Organisation	WEL Networks
Proposal number	CRP7-005 Clarify that several points of connection may be recorded under a single ICP.

Questions	Comments
Q1. Do you agree the issue(s) identified by the Authority need attention? Any comments?	<p>No. While in the past, (with longer ICP switch timeframes and more rudimentary billing systems / vacant ICP processes), there were occurrences of the examples referenced in the proposal, retailers have developed remedies (e.g. billing by consumer number, combine & centralise processes) that carry far less detrimental impact to the wider industry.</p> <p>More importantly the one-to-one relationship of the physical connection and ICP identifier underpins much of the industry and any desire to alter this needs far more investigative rigour than presented in this proposal.</p>
Q2. Do you agree with the objectives of the proposed amendment? Any comments?	No. We do not agree that the amendments is constant with the principles. There is not a clear case for regulatory change.
Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Any comments?	No. The costs of the industry-wide detrimental effects of this proposal will far outweigh any minimal possible benefits.
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>No. This proposal should not proceed as the assessments against principles are incorrect and there seems to be no analysis of downstream effects of the change (see below for examples)</p> <p>Principle 1: The problem has not been sufficiently defined or quantified to the extent that a resolution is required.</p> <p>Principle 2: While implementation costs may be 'negligible', costs of the consequential impacts will be great and ongoing. In the evaluation of costs there does not appear to be any thought to costs involved in industry systems adapting/consolidating records of combined ICPs (which even on a qualitative assessment would be greater than any benefits), let alone the extensive consequential costs.</p>
Q5. Do you have any comments on the drafting of the proposed amendment?	The only drafting changes that should be pursued is the change of '1' to 'one' in Part 1 and Part 12A ICP definitions.

Q6. Do you have any further comments on the proposal?

To illustrate how embedded the one-to-one relationship of physical connection to ICP identifier is now in our industry, below are examples of downstream impacts of the proposed change. This list is not exhaustive but indicates the amount of in-depth consideration required for a change of this nature.

Change will create conflict with other parts of the Code referencing ICP rather than ICP identifier.

e.g. 11.7 Provision of **ICP** information.

Clause 2(1) of schedule 11.1 *Each **ICP identifier** must have a location address that allows the **ICP** to be readily located.*

Clause 15.5 (1) *...must ensure that **volume information** for each **ICP** is allocated ...*

Loss of physical location data of additional connection points as only one address per identifier is stored in the Registry.

Disrupting the ICP identifier as the primary record of a connection in a multitude of data systems throughout the industry.

Loss of clear visibility of which connection has what consumption (has replaced ICP description with requiring knowledge of individual meter numbers).

Separate connection metering statuses (one meter non-communicating) creating issues in consumption data flows to market settlements and network billing.

Individual connection points may have separate price categories, but the ICP identifier can only have one recorded.

Physical connections could be on different network transformers causing issues in Network Geospatial Information Systems. Network load and connection tracing would be broken effecting outage notifications, load management and analysis and planning. As written, the Code change even allows for ICPs in different networks to have a common ICP identifier (e.g. a home and bach for the same consumer).

As ICPs are the actual point of supply from a distribution network, combining under a common identifier creates difficulties in identifying the correct connection point for disconnections or isolating the physical connection point. If one connection point is de-energised, what ICP status is displayed in Registry? If INACTIVE, presents H&S risk as one connection is ACTIVE, if ACTIVE there is a loss of the disconnection record. Similar complications if one of the connections is subsequently decommissioned.

If only one connection is isolated there is the potential for live flow via connected connection points.

Consumers/owners at connection points can be fluid. While one owner/consumer may wish them combined, the next

	<p>may wish separation e.g. farms with workers quarters, a sublet granny flat on a residential property. Similarly, the retailer configuration may change with subsequent owners which would be restricted if maintained under a common ICP identifier.</p> <p>Losing visibility of every connection point will impact the quality and reliability of industry reporting such as ANZIC, ICP days and consumption data.</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>

Code review programme #7 submission form

Submitter	Andrew Maseyk
Organisation	WEL Networks
Proposal number	CRP7-008 Process for updating the registry and reducing distribution charges for non-supply

Questions	Comments
Q1. Do you agree the issue(s) identified by the Authority need attention? Any comments?	Partially. Problems 1 & 2 are not industry wide issues and seem to be nuances brought about by how some distributors have decided to meet their service disruption obligations. Other distributors have alternative methodologies. Problem 3 is an issue in that that if an EDB is allowed to alter status to 'inactive', they should be allowed to restore back to 'active'
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?	It should be noted that benefits will only accrue to distributors using ICP status events to manage their service disruption obligations, but the activity of altering the DDAs will fall to all distributors.
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?	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	No

(refer paragraphs 1.10 to 1.12 of the consultation paper)

Code review programme #7 submission form

Submitter	Andrew Maseyk
Organisation	WEL Networks
Proposal number	CRP7-013 Access to an ICP for disconnection

Questions	Comments
Q1. Do you agree the issue(s) identified by the Authority need attention? Any comments?	Uncertain. We can understand the frustration of retailers not being able to disconnect at the meter board, but with the growing penetration of communicable smart meters, physical access to disconnect at meter should be an ever-decreasing issue. In the remaining instances where this is still not possible the ICPs can be disconnected at the network connection point.
Q2. Do you agree with the objectives of the proposed amendment? Any comments?	No. There will be no efficiency improvement as a result of this change, simply a shift of effort from the time of physical disconnection in a small number of instances, to confirmation/compliance effort for every new connection in the future.
Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Any comments?	No evidence has been presented that pursuit of a Code amendment is the appropriate way to resolve and no alternative approaches seem to have been considered.
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.	Nor does the Code amendment address the root cause which is a physical location issue which then creates legal access issue. Maybe inclusion of right of access within retailer terms and conditions, or Electricity (Safety) Regulations and associated wiring standards amendments (to address root cause) could be explored.
Q5. Do you have any comments on the drafting of the proposed amendment?	Setting aside we are not sure a Code change is the correct solution for this problem; the proposed drafting amendment has shortcomings in that : <ul style="list-style-type: none"> - it only addresses a single user case – that of a shared meter board being located in a single property. - it places compliance at the wrong point of the connection process. At the time of application and creation of an ICP, it would not necessarily be known (by any party) whether a shared meter board will be utilised, its ultimate location, or the relationship between consumers (current and future) at the ICP. Waiting for these issues to be resolved before allowing ICP creation or connection will add significant delays into the process.

Q6. Do you have any further comments on the proposal?	While we agree defined problem is a frustrating issue, we do not believe that this proposal is the solution and requires further work so should not proceed as presented.
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