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★ wellington electricity™

Code review programme #7

9 June 2026

1 Submission and contact details

Consultation	Code review programme #7
Submitted to	Electricity Authority
Submission address	distribution.feedback@ea.govt.nz
Date submitted	9 June 2026
Email	regulatoryconsultations@welectricity.co.nz

2 Confidential information

There is no confidential information provided in this submission. This submission can be publicly disclosed.

3 Introduction

Wellington Electricity support the EA's Code review proposal for multiple ICPs, as it provides flexibility for EDBs and customers to select the best arrangement that suits practical requirements. We also note a well-known issue with private networks operating behind an ICP. In some cases, end customers are not aware that they are connected via a private network, and when issues arise, responsibility is often incorrectly attributed to the EDB. While this proposed change appears to be directed at individual customers rather than private network owners, the interaction with private networks and the potential for misallocation of responsibility should be carefully considered in future proposals.

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Proposal number	CRP7-005
Questions	Comments
Q1. Do you agree the issue(s) identified by the Authority need attention? Any comments?	Yes / No. Comments: We agree that the current wording of the Code is ambiguous around the assignment of ICPs for cases where customers have multiple connections to the network.
Q2. Do you agree with the objectives of the proposed amendment? Any comments?	Yes / No. Comments:

	We agree that flexibility in how a network manages customers and their needs, will result in preferred outcomes.
Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Any comments?	<p>Yes / No. Comments:</p> <p>We would like to highlight that consolidating connections under one ICP would not necessarily reduce distributor costs. There may be additional costs that come with managing multiple ICPs under one customer (for billing purposes). If this is the most practical approach for the customers connection, then there are benefits to be had, like the ease of switching retailer as described in the evaluation.</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>Yes / No. Details of your preferred option:</p> <p>N/A, no alternatives provided.</p>
Q5. Do you have any comments on the drafting of the proposed amendment?	We support that the drafting requires a practicality component to enable multiple connections under one ICP. There are some cases where customers may prefer one ICP, but due to the network setup, it is unfeasible. With a practical approach this allows EDBs to make their own assessments on the connection, to maintain network reliability and ensure health and safety is maintained for customers and lines crew (for example, where one connection could back feed during an outage).
Q6. Do you have any further comments on the proposal?	<p>Future proposals on ICP separation or consolidation should ensure the following:</p> <ol style="list-style-type: none"> 1 Customers remain responsible to address future changes where a return to multiple connections may be required to provide separate retailing choices. 2 Assets employed may require rationalization costs to decommission connections removed and recommission larger network capacity from consolidation of ICP's 3 Awareness of impact of disconnection of single ICP has on multiple downstream connections.

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)

Yes / **No**. If yes, comments: