Code review programme #7

Decision paper

21/07/2026

ELECTRICITY AUTHORITY
TE MANA HIKO

Executive summary

The Electricity Authority Te Mana Hiko has decided to implement 13 of the 14 proposals from our latest Electricity Industry Participation Code 2010 (Code) review programme. These changes enhance the Code’s clarity and ensure industry regulations support New Zealand’s evolving electricity system.

This is the Electricity Authority’s seventh Code review programme. It brings together smaller changes into one update. This approach helps keep the regulations up to date as the electricity system changes and allows the Code to be improved regularly.

We have considered all the feedback received during the consultation process and have decided to implement all but one of the proposed changes. Many of the amendments have had small changes made to the drafting as a result of feedback. The changes include a range of minor amendments and clarifications. We are not proceeding with the proposal to clarify that several points of connection may be recorded under a single ICP identifier.

Twelve of the Code amendments will be effective from 1 September 2026, and one amendment will take effect from 30 October 2026.

Contents

1 Purpose

1.1 The Electricity Authority Te Mana Hiko (Authority) has decided to make changes to several parts of the Electricity Industry Participation Code 2010 (Code).

1.2 These amendments reduce cost pressures on participants and result in lower overall costs for consumers. The amendments do this by increasing the efficiency of industry processes or removing obsolete obligations.

Code review programme number 7 (CRP7)

1.3 On 12 May 2026, we published a consultation paper: Code Review Programme number 7. It included 14 discrete proposals to amend the Code.

1.4 Code change proposals usually focus on a single topic. The Code review programme is different. It allows the Authority to make several independent and relatively small amendments with different themes, all at once. This approach helps us use resources efficiently and keeps the Code up to date through regular improvements.

1.5 In addition to the 14 Code amendment proposals, the consultation paper also included a proposal to correct 27 minor typographical and other errors in the Code. These included incorrectly bolded (or not bolded) terms, incorrect clause references, or clauses that are missing minor words.

1.6 This paper sets out the Authority's decision to amend the Code and explains the reasons for those decisions.

1.7 Decisions on the 14 Code amendment proposals are set out in this paper each with a unique reference number. Each proposal is discrete from the others. The decision paper format supports participants to identify and understand the changes made.

1.8 Setting out the changes separately allows participants to assess how each amendment will affect their Code obligations. In this case, all but one of the proposals are proceeding, some in an amended version from what was proposed in the consultation paper to improve clarity and to respond to submitter feedback.

1.9 This paper also includes the Authority's decision to correct minor typographical and other errors in the Code. These amendments are considered technical and non-controversial under section 39(3)(a) of the Electricity Industry Act 2010 (Act). No submissions were received on these amendments, and the Authority has decided to make the proposed amendments as consulted on. The Authority will also make four further minor amendments to address typographical errors and improve clarity in addition to those set out in the consultation paper, noting that technical and non-controversial amendments do not require the Authority to consult.

1.10 More information about the Code review programme, including the consultation paper, is available on our website: https://www.ea.govt.nz/projects/all/code-review-programme/.

1.11 The Code amendments will come into force on two different dates:

Table 1: List of amendments proceeding 1 September 2026

Reference	Topic	Page
CRP7-001	Align terminology for maximum export power	8
CRP7-002	Retailers without websites	9
CRP7-003	Require a policy where a distributor's generation or retail business is not a separate business	10
CRP7-004	Extend participant audit to include use of EIEPs	13
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CRP7-009	Enable faster distributor price codes establishment	29
CRP7-011	Revoke the Authority's power to grant Part 6A dispensations and the definition of specified person	34
CRP7-012	Amend clauses 10.29B and 10.29C	36
CRP7-013	Access to ICP for disconnection	40
CRP7-014	Clearing manager's payment obligations and the clearing manager's liability to pay interest	43

Table 2: List of amendments proceeding 30 October 2026

Reference	Topic	Page
CRP7-010	Billing obligations on retailers who operate multiple brands	31

1.12 One proposed Code amendment will not proceed.

Table 3: List of amendments not proceeding

Reference	Topic	Page
CRP7-005	Clarify that several points of connection may be recorded under a single ICP identifier	16

2 Submissions on CRP7

2.1 We received submissions on our CRP7 consultation paper from the 16 parties listed in Table 4. These submissions are available on our website: https://www.ea.govt.nz/projects/all/code-review-programme/consultation/code-review-programme-7/.

2.2 The issues raised by submitters are discussed under each relevant proposal.

Table 4: List of submitters

Submitter	Role	Proposal(s) addressed
Bluecurrent	Metering equipment provider	006
Contact Energy	Generator and retailer	004, 005, 008
ERGANZ	Industry association	004, 005, 006, 008, 009, 010, 014
Intellihub	Metering equipment provider	005, 006
MainPower and Marlborough Lines	Distributor	005
Meridian Energy	Generator and Retailer	004, 006, 008, 010
Network Tasman	Distributor	001, 004, 005, 008, 009
Orion	Distributor	001, 004, 005, 008, 009
Powerco	Distributor	001, 005, 008, 009, 013
Private individual	Private individual	005, 008, 013
Transpower	Grid owner	006, 012
Vector	Distributor	001, 004, 005, 008, 013
Veritek Limited	Approved participant auditor	005, 006
Waipā Networks	Distributor	004, 005, 013
Wellington Electricity	Distributor	005
WEL Networks	Distributor	004, 005, 008, 013

3 The CRP7 amendments promote our statutory objectives and are consistent with regulatory requirements

3.1 The Authority's main statutory objective is to promote competition in, reliable supply by, and the efficient operation of, the electricity industry for the long-term benefit of consumers. The Authority's additional objective is to protect the interests of domestic and small business consumers in relation to the supply of electricity to those consumers. The additional objective applies only to the Authority's activities in relation to the dealings of industry participants with domestic consumers and small business consumers.

The amendments are either necessary or desirable to promote, or are consistent with, the Authority's statutory objectives

3.2 After considering all submissions, the Authority considers the final Code amendments will deliver long-term benefits to consumers consistent with the Authority's main objective.

The benefits of the proposals are greater than the costs

3.3 The Authority has assessed the economic benefits and costs of the amendments and considers that each one delivers a net benefit.

3.4 The consultation paper describes the expected costs and benefits of each proposal in more detail. Additional considerations arising from submissions are set out in the decision for each relevant proposal below, where these considerations altered the Authority's assessment of whether the benefits of the amendments are greater than the costs. For the remaining amendments, no feedback was received that changed the Authority's assessment in the consultation paper of the benefits of the amendments being greater than the costs.

3.5 For most amendments, the main economic benefit is lower transaction costs across the electricity industry, improving efficiency, which is a productive efficiency benefit. In addition, by improving the clarity and operation of the Code, the proposed amendments could also deliver dynamic efficiency benefits.

3.6 The Authority notes a clear, predictable and up-to-date set of industry rules is good regulatory practice and can facilitate increased participation in the electricity markets. This in turn might be expected to facilitate all three limbs of the Authority's statutory objective.

The amendments are consistent with regulatory requirements

3.7 The Code amendments are consistent with the requirements of section 32(1) of the Act.

3.8 The amendments are also consistent with the Authority's Code amendment principles.

4 How the amended Code wording is displayed in this decision paper

4.1 Code amendments in relation to CRP #7 in this decision paper are displayed as:

(a) added text or formatting is <u>underlined</u>

(b) deleted text is ~~strikethrough~~

(c) additional added text or formatting compared to our consultation paper are <u>red</u> underlined

(d) additional deleted text compared to our consultation paper is ~~red strikethrough~~

(e) blue text is text that was proposed to be deleted in consultation but is now being retained in the decision

(f) ~~<u>blue underlined strikethrough</u>~~ text is an addition that was proposed in consultation but has now been deleted in the decision

5 CRP7-001 Align terminology for maximum export power

The Authority's proposal

5.1 The Authority proposed to amend references in the Code to terms that are analogous to the definition of 'maximum export power' in Part 1, to use the term 'maximum export power'.

We have decided to implement the proposal without change

5.2 We have decided to amend the Code as proposed above without change.

5.3 The Code amendment will come into force on 1 September 2026.

5.4 We will instruct the registry manager to amend the Registry Functional Specification. The Authority will amend the related Guideline for entering distributed generation information into the registry.

Submissions and the Authority's response

5.5 There were three submissions on this proposal.

5.6 All submissions supported the proposal. One submitter recommended that the Authority consider whether apparent power (kVA) may be more appropriate than kW in certain contexts. We note this suggestion is out of scope of the change consulted on, but the Authority is intending to consider instances in Part 6 of the Code where kVA may be more appropriate in a later stage of the Network Connections programme[1].

The amendment will promote the efficient operation of the electricity industry

5.7 The Code amendment is consistent with the Authority's statutory objectives, and section 32(1)(c) of the Act, because it would contribute to the efficient operation of the electricity industry.

5.8 The Code amendment will improve the efficient operation of the electricity industry by making the Code easier to understand and would reduce compliance costs for the Authority and participants.

5.9 The Code amendment is expected to have no effect on competition and the reliable supply of electricity, or the interests of domestic and small business consumers in relation to the supply of electricity to those consumers, or the performance by the Authority of its functions.

Final amendment

Clause 7 of Schedule 11.1 Distributors to provide ICP information to registry manager

…

(o) if the ICP connects the distributor's network to distributed generation,—

> (i) the ~~maximum amount of **electricity** that can be injected into the **distributor's network** from~~ <u>**maximum export power** of the</u> **distributed generation** connected to the **ICP**~~, which is the sum of the maximum amount of electricity each generating unit connected to the **ICP** can inject into the distributor's network~~, in kW; and

…

[1] https://www.ea.govt.nz/projects/all/network-connections/

6 CRP7-002 Retailers without websites

The Authority's proposal

6.1 The Authority proposed to amend clause 6 of Schedule 11A.1 to clarify that obligations to display specific information on a retailer's website only apply to retailers who already maintain a website.

We have decided to implement the proposal without change

6.2 We have decided to amend the Code as proposed above without change.

6.3 The Code amendment will come into force on 1 September 2026.

Submissions and the Authority's response

6.4 There were no submissions on this proposal.

The amendment will promote the efficient operation of the electricity industry

6.5 The Code amendment is consistent with the Authority's statutory objectives, and section 32(1)(c) of the Act, because it would contribute to the efficient operation of the electricity industry.

6.6 The Code amendment will improve the efficient operation of the electricity industry by giving clarity to parties subject to Part 11A that the requirements concerning consumer-facing websites only apply to retailers with existing websites.

6.7 The Code amendment reduces any uncertainty regarding retailers' obligations and is expected to have no effect on the reliable supply of electricity, or the interests of domestic and small business consumers in relation to the supply of electricity to those consumers, or the performance of by the Authority of its functions.

Final amendment

...

6 Customer-facing website requirements

Each **retailer** <u>who maintains a **customer-**facing website</u> must clearly and prominently **publish** the following information in a dedicated section of their **customer**-facing website:

(a) a statement that the **retailer** has a **consumer care policy** which complies with the **Consumer Care Obligations**;
(b) the **retailer's consumer care policy** or a direct hyperlink to it;
(c) how to contact the **retailer** with any questions regarding the **retailer's consumer care policy** or the **retailer's** compliance with the **Consumer Care Obligations**;
(d) a hyperlink to the page of the **Authority's** website prescribed for the purposes of this clause; and
(e) information, including hyperlinks to the websites and contact details of:

(i) one or more **support agencies** offering advice on the efficient use of **electricity**;

(ii) one or more **support agencies** offering financial mentoring services; and

(iii) the dispute resolution scheme identified under clause 3 of Schedule 4 of the **Act**.

7 CRP7-003 Require a policy where a distributor’s generation or retail business is not a separate business

The Authority’s proposal

7.1 The Authority proposed to amend Part 6A of the Code to clarify that distributors are required to maintain and publish a policy, rather than a distribution agreement, when they hold exemptions to operate a connected generation or retail business as a single legal entity. We also proposed some consequential changes to improve the drafting of the relevant clause.

We have decided to implement the proposal without change

7.2 We have decided to amend the Code as proposed above without change.

7.3 The Code amendment will come into force on 1 September 2026.

Submissions and the Authority’s response

7.4 There were no submissions on this proposal.

The amendment will promote the efficient operation of the electricity industry

7.5 The Code amendment is consistent with the Authority’s statutory objectives, and section 32(1)(c) of the Act, because it would contribute to the efficient operation of the electricity industry.

7.6 The Code amendment would improve the efficient operation of the electricity industry by clearly setting out the obligations of parties that are exempt from the Part 6A corporate separation rules.

7.7 The Code amendment is expected to have a positive impact on competition as it will clarify any uncertainty regarding appropriate steps in respect to a distributors’ connected generation or retail business. It is expected to have no effect on the reliable supply of electricity, or the interests of domestic and small business consumers in relation to the supply of electricity to those consumers, or the performance of by the Authority of its functions.

Final amendment

Part 1 Preliminary provisions

1.1 Interpretation

(1) In this Code, unless the context otherwise requires,—

…

<u>**connected generator policy** means a policy a **distributor** is required to maintain in respect of a connected generator connected to the **distributor’s network** when the **distributor** is not subject to the corporate separation rule under clause 6A.3</u>

<u>**connected retailer policy** means a policy a **distributor** is required to maintain in respect of a connected retailer connected to the **distributor’s network** when the **distributor** is not subject to the corporate separation rule under clause 6A.3</u>

…

6A.4 Distributor agreements <u>and policies</u>

(1) Every **distributor** in respect of which there is a connected retailer or a connected generator carrying on business in a different company or other entity to the **distributor** must—

(a) have a comprehensive, written **distributor agreement** that provides for the supply of **line function services** and information to the connected retailer or connected generator (as the case may be); and

(b) ensure that the terms of that **distributor agreement** do not discriminate in favour of one business and do not contain arrangements that include elements that the business usually omits, or omit elements that the business usually includes, in **distributor agreements** with **unrelated parties** ~~that are—~~

~~(i) connected or related only by the transaction or dealing in question; and~~

~~(ii) acting independently; and~~

~~(iii) each acting in its own best interests~~; and

(c) operate in accordance with that **distributor agreement**; and

(d) **publish** that **distributor agreement** and provide it to the **Authority**.

(2) ~~A **distributor agreement** required by subclause (1)(a) must be entered into, in the case of a business to which the corporate separation rule does not apply, as if the **distribution** business and the connected retailer or connected generator were separate legal persons.~~ In the case of a **distributor** in respect of which there is a **connected retailer** or a **connected generator** and the corporate separation rule under clause 6A.3 does not apply, instead of having a **distributor agreement** in accordance with subclause (1), the **distributor** must—

(a) maintain a comprehensive, written internal **connected generator policy** or **connected retailer policy** (as the case may be) that—

(i) details the supply of **line function services** and information to the connected retailer or connected generator;

(ii) sets out how the **distributor** will not discriminate in favour of the connected retailer or connected generator;

(iii) sets out how the **distributor** will ensure that the way it deals with the connected retailer or connected generator is on the same terms under which the **distributor** usually contracts with **unrelated parties**;

(b) operate in accordance with that **connected generator policy** or **connected retailer policy**; and

(c) **publish** that **connected generator policy** or **connected retailer policy** and provide it to the Authority.

(3) In this clause, unless the context otherwise requires,—

connected generator, in relation to a **distributor**, means a generator—

(a) that has connected generation of more than 10 MW of generation that is connected to any of the **distributor's** networks; and

(b) in respect of which the **distributor**, or any other person involved in the **distributor**, is involved

connected retailer, in relation to a **distributor**, means a **retailer**—

(a) that is involved in retailing more than 5 GWh of **electricity** on the **distributor's** local network in a financial year to customers who are connected to that network; and

(b) in respect of which the **distributor**, or any other person involved in the **distributor**, is involved

local network means a network operated by a **distributor** in a contiguous geographic area or areas.

unrelated parties, in relation to a **distributor**, means parties that are—

(a) connected or related only by the transaction or dealing in question; and
(b) acting independently; and
(c) each acting in its own best interests.

(4) A **distributor** required to have a **distributor agreemen**t or a **connected generator policy** or a **connected retailer policy** under this clause must submit to the **Authority** a statement indicating whether, in the preceding calendar year,—
(a) the terms in the **distributor agreement** or the **connected generator policy** or the **connected retailer policy** are a true and fair view of the terms on which **line function services** and information were supplied in respect of the retailing or generating to which the agreement or the policy relates; and
(b) this clause was otherwise fully complied with.

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

The Authority’s proposal

8.1 The Authority proposed to amend Part 16A of the Code to require audits of distributors’ and reconciliation participants’ processes and procedures relating to the sharing of information in accordance with Electricity Information Exchange Protocols (EIEPs).

We have decided to implement the proposal with no change to its policy intent, but with revised Code drafting

8.2 We will amend the Code as proposed above with two amendments in response to submissions. The first change clarifies that only prescribed EIEPs are in scope of audit requirements. The second change is to replace ‘timeframes and manner in which that information is shared’ with ‘compliance with the business requirements, data format and validation rules contained within the EIEPs’ to align with the terminology used in the EIEPs.

8.3 The Code amendment will come into force on 1 September 2026.

Submissions and the Authority’s response

8.4 There were eight submissions on this proposal.

8.5 Four submissions supported the proposal. Three submissions did not support the proposal, and one expressed uncertainty about the problem the proposal seeks to address.

Submitters’ views – not all retailers are captured by reconciliation participant audit

8.6 Two submitters noted that the proposal would result in only partial monitoring of EIEPs since it is retailers that are required to use prescribed EIEPs, and not all retailers are reconciliation participants.

8.7 One submitter noted that this could lead to an unintended consequence where retail businesses structure themselves in a way to avoid audit related burdens, or that partial monitoring is inconsistent with the Authority’s competition limb of its statutory objective.

Authority’s response

8.8 We acknowledge the comment from submitters that the proposal will result in partial monitoring of EIEPs used by retailers. However, the majority of information exchanged via EIEPs will occur through reconciliation participants (and distributors).

8.9 All retailers using prescribed EIEPs 1, 2 and 3 are also reconciliation participants, therefore there will be no partial monitoring of these EIEPs.

8.10 The proposal will capture all medically dependent consumer information exchanged via EIEP4A, between a reconciliation participant and distributor, as:

(a) the retailer responsible for sending the EIEP4A to the distributor is also a reconciliation participant (they are a type 1 retailer with responsibility for the ICP in the registry)

(b) where the retailer is not a reconciliation participant (ie, they are a type 2 retailer, with a supply contract with the type 1 retailer for the ICP), these retailers submit their file to the type 1 retailer responsible for the ICP as per their obligations in Part 11A of the Code

(c) where any issues are identified with compliance in exchange of the EIEP 4A file by the type 2 retailer, the audit would flag non-compliance of the non-audited participant to the

Authority (as this will likely lead to the type 1 retailer having difficulty in fulfilling its obligation to pass the information onto the distributor).

8.11 Consumption information exchanged through EIEPs 13A and 13B by type 2 retailers will not be monitored through the audit regime, but will continue to be monitored via any complaints, as is currently the case for all retailers. Additionally, the absence of auditing does not exempt type 2 retailers from their Code obligations to comply with EIEPs 13A and 13B.

8.12 We consider the risk of retailers structuring out of this additional audit requirement to be low. The existing audit requirements for reconciliation participants are comprehensive and cover compliance with Parts 11 and 15 obligations. The proposed increase in audit scope is small compared with the extensive Parts 11 and 15 obligations and is limited to assessing compliance with existing Code provisions requiring the use of prescribed EIEPs. As such, it is not expected to impose a significant additional burden, given participants are already required to comply with EIEP provisions.

Submitters' views – a more targeted approach to EIEP monitoring is preferred

8.13 Of the four submitters who either did not support the proposal, or were uncertain of the problem definition:

(a) all suggested that monitoring of EIEP usage should be done through a more targeted review of impacted participants and EIEPs, and

(b) two noted that participants have sufficient existing commercial incentives to ensure compliance with EIEP mechanisms and information accuracy, and

(c) one noted that the additional audit scope could increase costs for participants that exceed the expected benefits of the proposal.

Authority's response

8.14 The Authority considers that the least costly mechanism to monitor practice in using EIEPs is to utilise the existing Part 16A audit regime, rather than to establish a new and separate monitoring regime. Setting up a separate monitoring regime for EIEPs will incur additional costs without achieving any material additional benefits over using the existing audit regime.

Submitters' views – clarify scope of audit

8.15 Two submitters asked for more clarity in the proposal's Code drafting, including whether the drafting should specify that the scope be limited to regulated EIEPs, and that 'timing' and 'manner' would benefit from a more precise definition.

Authority's response

8.16 The Authority agrees that more clarity of the audit scope in the Code will help participants and auditors to understand and comply with audit requirements. We have amended the proposal to clarify that only prescribed EIEPs are in scope of the additional audit requirements.

8.17 We have also replaced the words 'the timeframe and manner in which that information is shared' with 'compliance with the business requirements, data format and validation rules contained with the EIEPs' to align with the terminology used in the EIEPs.

The amendment will promote the efficient operation of the electricity industry

8.18 The Code amendment is consistent with the Authority's statutory objectives, and section 32(1)(c) of the Act, because it would contribute to the efficient operation of the electricity industry.

8.19 The Code amendment will improve the efficient operation of the electricity industry by improving the ability to identify common errors in EIEP files and exchange processes. This will reduce instances of errors in the exchange of information between participants, meaning processes that rely on the exchange of information can take place with less manual checks and rework.

8.20 The Code amendment is expected to have no effect on competition and the reliable supply of electricity, or the interests of domestic and small business consumers in relation to the supply of electricity to those consumers, or the performance by the Authority of its functions.

Final amendment

Subpart 4 – Distributor audits

…

16A.23 Additional requirements for distributor audits

In addition to the requirements specified in clauses 16A.3 to 16A.16, a **distributor** must ensure that the **auditor** carrying out an **audit audits** the **distributor's** processes and procedures in relation to—

(a) the creation of **ICP** identifiers for **ICPs**; and

(b) the provision of **ICP** information to the **registry manager** and the maintenance of that information in the **registry**; and

(c) the creation and maintenance of loss factors; and

(d) the sharing of information a distributor is required to share in accordance with an **EIEP** prescribed by the **Authority** under this Code, including ~~the timeframes and manner in which that information is shared,~~ compliance with the business requirements, data format and validation rules contained within the **EIEP**.

16A.24A Additional requirements for reconciliation participant audits

In addition to the requirements specified in clauses 16A.3 to 16A.16, a **reconciliation participant** must ensure that the **auditor** carrying out an **audit audits** the **reconciliation participant's** processes and procedures in relation to the sharing of information the **reconciliation participant** is required to share in accordance with an **EIEP** prescribed by the Authority, including ~~the timeframes and manner in which that information is shared~~ compliance with the business requirements, data format and validation rules contained within the **EIEP**.

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

The Authority's proposal

9.1 The Authority proposed to:

(a) amend the definition of ICP in Part 1 and Schedule 12A.4 of Part 12A of the Code to clarify that an ICP in respect of an electrical facility that connects a retailer's customer to a network may comprise of one or more points of connection; and

(b) amend clause 11.3 of the Code to clarify that an ICP identifier may include more than one point of connection for a single consumer, where practical.

We have decided not to proceed with implementing the proposal at this time

9.2 For the reasons in paragraphs 9.5 to 9.11, we have decided to withdraw the proposal.

Submissions and the Authority's response

9.3 There were 13 submissions on this proposal.

9.4 Two submissions supported the proposal, while 11 did not. All submitters provided comments on the proposal.

Submitters' views

9.5 Those who opposed the proposal considered that the cost impacts are wider in scope and more significant than identified in the proposal's assessment. These submitters generally noted that the proposal responded to what was historical practice, and expressed concern that downstream industry processes, such as switching, metering obligations, SAIDI and SAIFI calculations, establishing lines ownership, and broader network management (which includes health and safety considerations), would be more affected than was identified in the proposal. Concerns were particularly strong regarding potential health and safety implications.

9.6 Several submissions also noted that the registry's current functionality does not support multiple points of connection for a single ICP, and to amend the registry's functionality would further increase the costs of the proposal's implementation.

9.7 Three submitters agreed that there is ambiguity in the current drafting, although two submitters considered the Code as written clearly establishes a one-to-one relationship between a point of connection and ICP.

Authority's response

9.8 The Authority notes the concerns raised by submitters about the consequential costs of the proposed amendment for industry participants.

9.9 The Authority notes the intent of the proposal was to normalise what it understood to be historical practice by some distributors, particularly for rural properties with more than one physical connection under one ICP identifier (eg, a farmhouse and a water pump in a separate paddock). It was not intended that changes to the registry functionality would be needed.

9.10 The Authority accepts submitters' comments that this reflects past, rather than current, practice and that a Code change is not needed at this time.

9.11 The Authority will consider if an alternative proposal that clarifies a one-to-one point of connection and ICP relationship would address any remaining ambiguity in a future Code review programme.

10 CRP7-006 Require action when insufficient load to certify metering

The Authority’s proposal

10.1 The Authority proposed to amend the Code to require the metering equipment provider (MEP) and retailer to take action if, at the time of the subsequent visit to the metering installation required under clause 14(4) of Schedule 10.7, there is insufficient load to complete testing, by ultimately disconnecting the supply if access cannot be arranged at times the metering installation will have sufficient load for certification.

We have decided to implement the proposal with no change to its policy intent, but with revised Code drafting

10.2 We have decided to amend the Code to include a process that will enable traders to reasonably identify a day and time when sufficient load is likely to be present for a second subsequent visit to the affected metering installation to take place.

10.3 However, we have decided to remove the final proposed clause that would have required disconnection of supply if the second subsequent visit also found insufficient load to complete testing.

10.4 We have also decided to extend the timeframe for retailers to make the necessary arrangements from five business days in the original proposal, to ten business days in the final amendment.

10.5 The Code amendment will come into force on 1 September 2026.

Submissions and the Authority’s response

10.6 There were six submissions on this proposal.

10.7 Two supported the proposal, while four did not.

10.8 Of the four submitters who did not support the proposal, three of these were primarily concerned with the proposed disconnection if certification cannot be completed.

10.9 Of the two submitters who did support the proposal, one also emphasised the need for appropriate safeguards governing disconnection.

Submitters’ views – proposal does not address broader issue of unsuitable metering installations

10.10 Two submitters noted a wider issue: in some cases, the electrical load at a premise may never reach a level sufficient for the metering installation to be certified. In these situations, there is little guidance or Code provision setting out the obligations, which can result in uncertified metering installations persisting without further action, such as a reassessment of the installation.

Authority’s response

10.11 We note that there are Code provisions in Part 11, clause 6 which allow an ATH to certify at a lower category (which have a lower certification threshold) in certain circumstances if identified that the metering installation has equipment limitations that will not allow for a higher category to be met.

10.12 We accept the broader issues raised relating to load certification, but note the policy intent of the proposal is to provide a contingency for the event of insufficient load to certify the metering during the subsequent visit that occurs under clause 14. To address broader issues is out of scope for this amendment. We will consider a scope for broader load certification issues in a future Code review programme.

Submitters' views – proposed disconnection clause has a material impact

10.13 Three submitters were opposed to disconnection as a possible outcome, while one submitter cautioned that the use of any disconnection clause should be a genuine last resort option.

10.14 Submitters on this point were concerned that any obligation to disconnect would be a significant change in retailer obligations, and that to disconnect supply as a last resort could incur more significant costs (including to reconnect, or amend retailers' customer terms and conditions).

Authority's response

10.15 The Authority has considered submitters' views and decided to remove the proposed clauses 14(11) and 14(12) from the Code amendment. We acknowledge that the amendment will only provide a partial solution to the problem as there is no final provision or incentive to fully resolve the uncertified meter issue.

10.16 We will reconsider this issue in a future Code review programme if material issues persist due to the absence of a defined pathway to close out uncertified metering outcomes.

Submitters' views – retailer obligations

10.17 One submitter queried whether the five days given to the trader in proposed subclause (8) is sufficient to identify one or more days and times at which there is likely to be sufficient load to complete testing, particularly where the trader may first need to obtain information from the consumer.

10.18 Another submitter suggested that the proposed subclause (8) should specify that the retailer assess if it is possible to provide the required load on demand and that the retailer's information on when to attend the site must include the time agreed with the end customer.

Authority's response

10.19 We note the concern about the traders' allowed timeframe to complete the actions of subclause (8) and have amended the subclause (8) to specify a 10-business day requirement in place of 5 business days.

10.20 We agree that retailers may need to make arrangements with the end customer to ensure sufficient load, especially if the metering data does not identify a regular pattern of times sufficient load is usually available. Alternatively, retailers may need to arrange for a load bank to be available, either directly sourcing one or making the arrangement through the MEP and ATH. However, these are just possible steps that a retailer can take and they will only be relevant in some cases. In our view, these steps are more in the nature of guidance and not suitable for inclusion within Code.

The amendment will promote the efficient operation of the electricity industry

10.21 The Code amendment is consistent with the Authority's statutory objectives, and section 32(1)(c) of the Act, because it would contribute to the efficient operation of the electricity industry.

10.22 The amendment will improve the efficient operation of the electricity industry by providing a process under clause 14 of Schedule 10.7 when, at a subsequent site visit to attempt prevailing load testing, there is insufficient load to test.

10.23 The Code amendment is expected to have no effect on competition and the reliable supply of electricity, or the interests of domestic and small business consumers in relation to the supply of electricity to those consumers, or the performance by the Authority of its functions.

Final amendment

…

Schedule 10.7, clause 14 Insufficient load for metering installation certification tests

(1) This clause only applies if there is insufficient **electricity** conveyed through a **point of connection** to allow an **ATH** to complete a prevailing load test for a **metering installation** that is being certified as a **half-hour metering installation**

(2) When this clause applies, the **ATH** must, when **certifying** the **metering installation**, ensure that—

(a) it performs an additional integrity check of the **metering installation** wiring, and records the results of this check in the **certification report**; and

(b) it records in the **certification report** that the **metering installation** is **certified** under this clause.

(3) A **metering equipment provider** must, for each **metering installation** for which it is responsible, and that is **certified** under this clause, obtain and monitor **raw meter data** from the **metering installation** at least once each month during the period of **certification** to determine if load during the month is sufficient for a prevailing load test to be completed.

(4) Despite subclause (1), the **metering equipment provider** must, if **raw meter data** obtained under subclause (3) demonstrates, at any time, that there is sufficient **electricity** conveyed through the **point of connection** for a prevailing load test to be completed, ensure that the **certifying ATH** makes a subsequent visit to the **metering installation** as soon as practicable, but no later than 20 **business days** after the **metering equipment provider** has obtained the **raw meter data**, to carry out and complete the tests set out in Table 4 of Schedule 10.1.

(5) The **certifying ATH** must, if the tests referred to in subclause (4) demonstrate that the **metering installation** performs within the relevant maximum permitted error set out in Table 1 of Schedule 10.1,—

(a) update the **metering installation certification report**, within 5 **business days** of completing the tests, to include the results of the tests carried out; and

(b) leave the original **metering installation certification** expiry date unchanged.

(6) If the tests referred to in subclause (4) demonstrate that the **metering installation** does not perform within the relevant maximum permitted error set out in Table 1 of Schedule 10.1—

(a) the **metering installation certification** is automatically cancelled from the date of the tests; and

(b) the **certifying ATH** must advise the **metering equipment provider** of the cancellation within 1 **business day** of carrying out the tests; and

(c) the **metering equipment provider** must follow the procedure set out in clauses 10.43 to

10.48.

(7) If the **certifying ATH** makes a subsequent visit to the **metering installation** under subclause (4) and there is insufficient **electricity** conveyed through the **point of connection** to allow the **certifying ATH** to complete the tests set out in Table 4 of Schedule 10.1—

(a) the **certifying ATH** must notify the **metering equipment provider** that there was insufficient **electricity** to complete the tests; and

(b) within 3 **business days** of receiving notice from the **certifying ATH** under subclause (7)(a), the **metering equipment provider** must notify the **trader** responsible for that **metering installation** that there was insufficient **electricity** to complete the tests.

(8) A **trader** notified under subclause (7)(b) must, within ~~5~~10 **business days** identify a date and time at which there is likely to be sufficient **electricity** conveyed through the **point of connection** for the tests set out in Table 4 of Schedule 10.1 to be completed, and notify the **meter equipment provider** of that date and time ~~of one or more days and times at which there is likely to be sufficient electricity conveyed through the point of connection for the prevailing load tests to be completed~~.

(9) The **meter equipment provider** notified under subclause (8) must ensure that a **certifying ATH** makes a subsequent visit to the **metering installation** which occurs—

(a) as soon as practicable, but no later than 20 **business days** after the **meter equipment provider** receives notification under subclause (8); and

(b) at a day and time identified by the **trader** under subclause (8).

(10) If the **certifying ATH** makes a subsequent visit to the **metering installation** pursuant to subclause (9)—

(a) subclauses (5) or (6) apply, as the case may be, with necessary amendments; or

(b) the **certifying ATH** must notify the **metering equipment provider** within one **business day** if there is insufficient **electricity** conveyed through a **point of connection** to allow the **certifying ATH** to complete the tests.

~~(11) The metering equipment provider notified under subclause (10)(b) must either—~~

~~(a) electrically disconnect the metering installation as soon as practicable, if authorised by the trader responsible for that metering installation; or~~

~~(b) if not authorised by the trader to perform the electrical disconnection, within one business day notify the trader responsible for that metering installation that it is required to take the action required in subclause (12).~~

~~(12) A trader notified under subclause (11)(b) must, within 5 business days, electrically disconnect—~~

~~(a) the ICP; or~~

~~(b) the load at the metering installation if there is more than one metering installation at the ICP.~~

11 CRP7-007 Updating metering standards references

The Authority's proposal

11.1 The Authority proposed to update the references to metering and data storage device standards in Table 5 of Schedule 10.1 of the Code to reflect the current versions and to include the version (year) of each standard.

We have decided to implement the proposal without change

11.2 We have decided to amend the Code as proposed above.

11.3 The Code amendment will come into force on 1 September 2026.

Submissions and the Authority's response

11.4 There were no submissions on this proposal.

The amendment will promote the efficient operation of the electricity industry

11.5 The Code amendment is consistent with the Authority's statutory objectives, and section 32(1) of the Act, because it would contribute to the efficient operation of the electricity industry.

11.6 The Code amendment would improve the efficient operation of the electricity industry by referencing up to date standards, reducing time spent by industry participants cross-referencing former standard references with current standards.

11.7 The Code amendment is expected to have no effect on competition and the reliable supply of electricity, or the interests of domestic and small business consumers in relation to the supply of electricity to those consumers, or the performance by the Authority of its functions.

Final amendment

Schedule 10.1

…

Table 5

Meter and data storage device standards	**Standards**
Electricity metering equipment (AC) – Part 1: General requirements, tests and test conditions (class indexes ~~0.5~~A, ~~1~~B and ~~2~~C)	EN 50470-1 +A1:2018
Electricity metering equipment (AC) – Part 2: Particular requirements – Electromechanical meters for active energy (class indexes ~~1~~A and ~~2~~B)	EN 50470-2+AMD1:2018
Electricity metering equipment (AC) – Part 3: Particular requirements – Static meters for active energy (classes 0.5, 1 and 2)	EN 50470-3:2022
Electricity metering equipment (AC) – Particular requirements – Part 11: Electromechanical meters for active energy (classes 0.5, 1 and 2)	IEC 62053-11+AMD1:2016
Electricity metering equipment (AC) – Particular requirements – Part 21: Static meters for active energy (classes 1 and 2)	IEC 62053-21:2020
Electricity metering equipment (AC) – Particular requirements – Part 22: Static meters for active energy (classes 0.1 S, 0.2 S and 0.5 S)	IEC 62053-22:2020
Electricity metering equipment (AC) – Particular requirements – Part 23: Static meters for reactive energy (classes 2 and 3)	IEC 62053-23:2020
Electricity metering equipment (AC) – Particular requirements – Part 61: Power consumption and voltage requirements	IEC 62053-61:1998
Electricity metering equipment (AC) – General requirements, tests and test conditions – Part 11: Metering equipment	IEC 62052-11:2020
Measuring transformer standards	
Instrument transformers – Part 1: General requirements	IEC 61869-1:2023

Meter and data storage device standards	Standards
Instrument transformers – Part ~~1~~ 2: Additional requirements for c~~C~~urrent transformers	IEC ~~60044-1~~61869-2:2012
Instrument transformers – Part ~~2~~ 3: Additional requirements for i~~I~~nductive voltage transformers	IEC ~~60044-2~~61869-3:2011
Instrument transformers – Part ~~3~~ 4: Additional requirements for c~~C~~ombined transformers	IEC ~~60044-3~~61869-4:2013
Instrument transformers – Part 5: Additional requirements for Capacitor voltage transformers	IEC ~~60044~~61869-5:2011
Coupling capacitors and capacitor dividers - Part 1: General rules	IEC 60358-1:2025
Coupling capacitors and capacitor dividers - Part 2: AC or DC single-phase coupling capacitor connected between line and ground for power line carrier-frequency (PLC) application	IEC 60358-2:2013
Coupling capacitors and capacitor dividers - Part 3: AC or DC coupling capacitor for harmonic-filters applications	IEC 60358-3:2013
Coupling capacitors and capacitor dividers - Part 4: AC or DC single phase capacitor dividers	IEC 60358-4:2018
Instrument transformers – Part 7: Electronic voltage transformers	IEC 60044-7:1999
Instrument transformers – Part 8: Electronic current transformers	IEC 60044-8:2002
Other standards	
Electricity metering equipment (AC) – Tariff and load control – Part 11: Particular requirements for electronic ripple control receivers	IEC 62054-11:2004+AMD1:2016
Electricity metering equipment (AC) – Tariff and load control – Part 21: Particular requirements for time switches	IEC 62054-21+AMD1:2017

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

The Authority's proposal

12.1 The Authority proposed to amend the Code to:

(a) allow distributor discretion in how and when to apply the reduction in distribution charges for non-supply, and

(b) allow distributors to revert the ICP status to 'Active' when the interruption to supply has been resolved.

We have decided to implement the proposal with no change to its policy intent, but with revised Code drafting

12.2 We have decided to amend the Code as proposed above, with a minor change to the Code drafting in response to a submission, as discussed in paragraphs 12.31 and 12.32.

12.3 The Code amendment will come into force on 1 September 2026.

12.4 We will direct the registry manager to make the necessary changes to the registry and amend the Registry Functional Specification.

Submissions and the Authority's response

12.5 There were nine submissions on this proposal.

12.6 Five submitters supported the proposal. One submitter did not support any part of the proposal, while three submitters only partially supported the proposal.

Submitters' views – costs of updating DDAs are incurred by all distributors

12.7 Two submitters noted that the activity of updating distributors' Default Distributor Agreements (DDAs) would impose administrative costs on all distributors (ie, template revisions and retailer notifications). However, they considered the benefits of the proposal would accrue only to distributors that process rebates for non-supply using registry updates.

Authority's response

12.8 The Authority acknowledges that distributors incur costs when updates to the Part 12A Appendix A (DDA template) are made.

12.9 Clause 11A of Schedule 12A.4 requires that distributors' amend their respective DDA template and publish that amended DDA template no later than 15 business days after the date of an amendment to the Part 12A Appendix A DDA template (or such longer period as the Authority may allow).

12.10 When an amendment is made to the Part 12A Appendix A DDA template, the affected clauses are deemed to be effective as per clause 13 of Schedule 12A.4. Given that existing DDAs are deemed to be amended accordingly with effect from the date of the amendment to the Code, any action to sign new DDA agreements with retailers is up to the distributor's discretion.

12.11 These clauses mean that while there are costs associated with the requirement on distributors to publish the updated DDA template within 15 days of the amendment, there is discretion available to the distributor regarding when to sign retailers onto the new template.

12.12 We note that there are no planned changes to the DDA template in the short term. The EIEP 4A example provided by a submitter is not, in our view, a necessary change to the

DDA template, as schedule 3 of the DDA template specifies 'any other EIEP publicised by the Authority under the Code with which the Distributor and Trader are required to comply'.

12.13 We will ensure that any future minor amendments identified as necessary to the DDA are collectively progressed through a Code review programme, including where appropriate to canvas participants for any other potential changes to the DDA template.

Submitters' views – mixed views on allowing distributors to revert ICP status to 'inactive'

12.14 One submitter was not supportive of the ability for distributors to revert status to 'active', with concerns that it would make the distinction between statuses less clear as this has traditionally been managed by retailers.

12.15 One submitter recommended that distributors be 'required' to change ICP status rather than 'may be managed' as proposed, citing that obligations should apply consistently across all distributors.

12.16 One submitter suggested that proposed clause 17(3) confirm that the trader be notified of a distributor reverting status to 'active' so that the trader's records and reconciliation remain accurate.

12.17 Four submitters supported that the proposed flexibility allows for distributors to either update the registry or provide information through another means.

Authority's response

12.18 Under Part 11, clause 19, distributors may change an ICP status to 'inactive' only where there is an interruption affecting electricity supply to the ICP (or where the ICP cannot be electrically disconnected following a request for electrical disconnection).

12.19 Where distributors instead notify traders of affected ICPs through alternative means (such as a separate report permitted under clause 9.10(a) of the DDA) rather than applying an 'inactive' ICP status, these distributors would not be permitted to change an ICP status to 'active' under this amendment.

12.20 Accordingly, the management of ICP status changes between traders and distributors should remain clear and well understood.

12.21 We also note, in response to the submission in paragraph 12.16 above, that registry reporting functionality is able to provide traders with confirmation of a change to 'active' status by a distributor.

Submitters' views – more discretion risks inefficiencies across networks

12.22 Two submitters were concerned that the discretion provided to distributors by the proposed amendments would lead to inconsistent outcomes for consumers, or that multiple approaches would reduce opportunities for automation, increase manual processing and reconciliation requirements or require additional system development.

12.23 One submitter supported the amendment but cautioned that monitoring should identify that discretion over processes of applying reduced services charges does not create inconsistencies across distributors for consumer outcomes.

Authority's response

12.24 While we acknowledge that it is necessary for retailers to accommodate varying distributor processes for applying reductions in distribution charges, the amendment will reduce the current inefficiencies in some distributors' manual rework required by the existing clause 9.10(b).

12.25 We note that some discretion is already provided for by the existing clause 9.10(a), where distributors may advise the trader of affected ICPs as part of the invoicing information for the next monthly billing cycle, or separately prior to the next month's billing cycle (for example by updating the registry status or 'inactive', or by sending a separate report).

Submitters' views – existing clause is suited to Registry's functionality

12.26 One submitter was of the understanding that, when a power outage occurs, the registry applies the change in inactive status from the start of the following day, which enables settlement processes to still occur in respect of an ICP with a partial day of consumption the day of an outage. This submitter stated the reduction in distribution service charges should continue to reflect these existing registry processes.

Authority's response

12.27 The Registry Functional Specification[2] provides that, in an outage context, the relevant date is the date on which the ICP is set to 'inactive', with that status taking effect from 00:00:00 on that date.

12.28 The existing clause 9.10(b) states that distributors are to set billed quantities for each day during which the interruption continues and the day the interruption ends to zero, which, if billing systems are automated to take the information from the registry regarding 'inactive' status, results in the days on which the reduction applies being one day offset from the requirement.

12.29 The amendment will provide discretion to set billed quantities to zero on a date that aligns with distributors' billing systems, and on the basis of registry convention stated in paragraph 12.27.

Submitters' views – a default timeframe should apply where distributor and trader do not reach agreement

12.30 One submitter viewed that the three-month period introduced by clause 9.10(c)(ii) introduces a long tail that potentially risks delaying benefits reaching consumers, and that the Code should confirm a default timing that applies if the trader and distributor do not reach agreement.

Authority's response

12.31 The amendment is proposed to enable distributors to pass through reductions in service charges for supply interruptions as soon as reasonably possible, with some flexibility where there are circumstances that affect their ability to provide the reduction in the next month's billing cycle (eg, the interruption occurs at the end of a month).

12.32 We have amended 9.10(c)(ii) to state that the reduction in service charges is to be provided by the distributor and trader agreeing to the distributor giving a rebate to the trader to be made 'as soon as practicable and in any case, not later than three months'.

The amendment will promote the efficient operation of the electricity industry

12.33 The Code amendment is consistent with the Authority's statutory objectives, and section 32(1)(c) of the Act, because it would contribute to the efficient operation of the electricity industry.

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[2] Under 1.6.3 of the Registry Functional Specification, 'Events'.

12.34 The amendment to the DDA in Schedule 12A.4 to Part 12A will better align with some distributors' automated systems and avoid manual re-workings of reductions for supply interruptions.

12.35 The amendment to Schedule 11.1 of Part 11 will improve the efficient operation of the electricity industry by ensuring prompt return of an ICP to 'Active' Status when electricity supply has been restored after an interruption.

12.36 The Code amendment is expected to have no effect on competition and the reliable supply of electricity, or the interests of domestic and small business consumers in relation to the supply of electricity to those consumers, or the performance by the Authority of its functions.

Final amendment

Part 12A, Schedule 12A.4 Appendix A

…

9.10 Reduction of charges due to electricity supply interruption: If, as a consequence of a fault on the Network, there is a continuous interruption affecting a Customer's Point of Connection for 24 hours or longer, the Distributor must:

(a) advise the Trader of the ICPs that are so affected either as part of the invoicing information for the next monthly billing cycle or separately prior to the next month's billing cycle (for example by updating the registry status to "Inactive", or by sending a separate report); and

(b) despite clauses 21 and 24, ~~in the next monthly billing cycle,~~ reduce the Distribution Services charges paid by the Trader in respect of the ICP or ICPs for that Customer during which supply of electricity was interrupted for longer than 24 continuous hours, either by:

  (i) setting the billed quantities for each day during which the interruption continues and the day the interruption ends, but not the first day during which the interruption began, to zero~~.~~; or

  (ii) setting the billed quantities for each day during which the interruption continues and the day the interruption began, but not the last day during which the interruption ends, to zero; and

(c) provide the reduction in Distribution Services charges referred to in subclause (b) to the Trader either:

  (i) in the next monthly billing cycle; or

  (ii) by the Distributor and Trader agreeing to the Distributor giving a rebate to the Trader to be made as soon as practicable and in any case, not later than ~~within~~ 3 months ~~of~~ after the day the interruption ended.

…

Part 11, Schedule 11.1

17 "Active" status

(1) Except as provided in subclause (3), the **ICP identifier** status of "Active" must be managed by the relevant **trader** and indicates that—

  (a) the associated **electrical facilities** are **electrically connected**; and

  (b) a **trader** must provider information related to the **ICP identifier**, in accordance with Part 15, to the **reconciliation manager** for the purpose of compiling **reconciliation information**.

(2) Before an **ICP** is given the "Active" status, the **trader** must ensure that—

  (a) the **ICP identifier** has only 1 **embedded generator**, **direct purchaser**, or customer of a **retailer**; and

(3) The **ICP** status of "Active" may be managed by a **distributor** where~~—~~:

(a) the relevant **distributor** has managed the "Inactive" status of the **ICP** under clause 19(2); and

(b) the interruption of **electricity** supply affecting the **ICP** indicated by the "Inactive" status has been resolved.

13 CRP7-009 Enable faster distributor price codes establishment

The Authority's proposal

13.1 The Authority proposed to amend clause 23 of Schedule 11.1 to add a new subclause (6) to enable a price category code to take effect in less than two months where the retailer and customer both consent.

We have decided to implement the proposal without substantial change

13.2 We have decided to amend the Code as proposed above, with one minor grammatical change.

13.3 The Code amendment will come into force on 1 September 2026.

Submissions and the Authority's response

13.4 There were four submissions on this proposal.

13.5 Three submitters supported the proposal, and one submitter supported the policy intent but questioned why the proposal required customer consent.

Submitters' views – whether the customer consent is necessary

13.6 One submitter questioned the need to obtain customer consent to implement a distributor price code earlier than the required two-month period. They noted that the two-month timeframe exists to support the retailer-distributor relationship and to allow sufficient time for retailers to update their billing systems to accommodate the change.

Authority's response

13.7 The Authority notes that, while the problem definition emphasised that the two-month timeframe is intended to allow affected retailers sufficient time to update their billing systems, it also reflects expectations that retailers clearly communicate price changes to their customers within a 30-day period. The Authority's *Guidelines for communicating price changes*[3] state that retailers should provide written notice to their customer at least 30 days before a price change takes effect. Requiring customer consent for earlier implementation helps ensure that retailers have met these communication obligations.

Submitters' views – clarity regarding the form customer consent can take

13.8 One submitter asked that the Authority confirm that written consent could be provided through a retailer's usual electronic consent processes, so the requirement does not introduce a disproportionate compliance step.

Authority's response

13.9 The Authority recognises that consent may be captured through any written means, including a retailer's standard electronic consent process. The key requirement is that clear evidence of the consent is retained, so that it can be relied on if any dispute arises later.

Submitters' views – proposal should extend to distributor loss category codes

13.10 One submitter suggested broadening the proposal to include the creation of loss category codes. They noted that clause 22 of Schedule 11 requires a loss category code to take effect no sooner than 2 months after it is included in the table.

[3] https://www.ea.govt.nz/documents/6447/Guidelines_for_Communicating_Price_Changes_.pdf

Authority's response

13.11 The Authority notes the intention of this proposal is to enable faster benefits from new developments in tariff designs. Any change to the arrangements for loss category codes would require consulting and is out of scope of this proposal.

The amendment will promote the efficient operation of the electricity industry

13.12 The Code amendment is consistent with the Authority's statutory objectives, and section 32(1)(c) of the Act, because it would contribute to the efficient operation of the electricity industry.

13.13 The Code amendment will improve the efficient operation of the electricity industry by inserting a mechanism for consenting parties to accelerate when a distributor price code change takes effect, and therefore avoid delayed benefits. The mechanism ensures that there are no needless delays to applying a distributor price code.

13.14 The Code amendment is expected to have no effect on competition and the reliable supply of electricity, or the interest of domestic and small business consumers in relation to the supply of electricity to those consumers, or the performance by the Authority of its functions.

Final amendment

Schedule 11.1 clause 23 Updating table of price category codes

(1) Each **distributor** must keep up to date the table in the **registry** of the **price category** codes that may be assigned to **ICPs** on each **distributor's network**, by entering in the table any new **price category** codes that may be assigned to an **ICP** on the **distributor's network**.

(2) Each entry in the table must specify the date on which each **price category** code takes effect.

(3) The date that a **price category** code takes effect must not be earlier than 2 months after the date on which the **price category** code is entered in the table.

(4) A **price category** code takes effect on the specified date.

(5) To avoid doubt, subclause (3) does not apply to the creation of an **ICP** or to the transfer of an **ICP** from ~~1~~ one **distributor's network** to another **distributor's network**.

(6) Despite subclauses (2), (3) and (4), a **price category** code may take effect in respect of an~~y~~ **ICP** earlier than the specified date, provided the **trader** who trades at that **ICP** and the customer at that **ICP** have given written consent to the **distributor** for that **price category** code to take effect on an earlier date.

14 CRP7-010 Billing obligations on retailers who operate multiple brands

The Authority’s proposal

14.1 The Authority identified a potential uncertainty in the obligations coming into effect on 30 October 2026 under the Electricity Industry Participation Code (Improving Electricity Billing) Amendment 2026 (billing amendment). There was concern about the application of some obligations in the billing amendment when retailers operate multiple brands, specifically the obligations on retailers to:

(a) publish and keep updated a plan catalogue (new clause 11A.17), and

(b) perform better plan checks for its customers (new Schedule 11A.2, clause 7).

14.2 The Authority’s policy intent was that retailers should have flexibility as to how they comply with these obligations, as there are many ways that different retailers operate their businesses.

14.3 When a retailer operates different brands, either under the same company structure or under separate companies, it should be able to choose to publish separate plan catalogues for its different brands. Retailers should not be required to provide better plan advice across its different brands, although it may wish to do so.

14.4 We proposed to amend new clause 11A.17 and clause 7 of new Schedule 11A.2 to clarify that a retailer who operates multiple brands may apply these obligations at a brand level. We also proposed to insert a new clause into existing Schedule 11A.1 to clarify that certain existing consumer care obligations may also be applied by the retailer at a brand level.

We have decided to implement the proposal without change

14.5 We have decided to amend the Code as proposed above.

14.6 The Code amendment will come into force on 30 October 2026 to align with the billing amendment.

Submissions and the Authority’s response

14.7 There were two submissions on this proposal, both in support.

Submitters’ views

14.8 Meridian Energy expressed its strong support for the proposal.

14.9 ERGANZ strongly supported the clarification that these obligations may be applied at brand level. ERGANZ asked for confirmation that this would be the case whether the brand were held within one legal entity or in separate companies.

Authority’s response

14.10 We acknowledge the issue ERGANZ has raised but do not consider any refinement to our proposal is required nor appropriate within the scope of this limited amendment.

14.11 The obligations in Part 11A of the Code apply to the retailer, as that term is defined in Part 1 of the Code. A “retailer” is a participant who supplies electricity to another person for any purpose other than for resupply by the other person. The Code provides that the term “participant” has the meaning given to it by the Act, which, pursuant to section 7 of the Act, includes a retailer. The Act defines “retailer” as a business engaged in retailing and “business” as any undertaking that is carried on whether for gain or reward or not.

14.12 Retailers should seek their own legal advice about how best to structure their companies and brands in order to comply with the Code.

The amendment will promote the efficient operation of the electricity industry

14.13 The Code amendment is consistent with the Authority's statutory objectives, and section 32(1)(c) of the Act, because it will contribute to the efficient operation of the electricity industry by making the Code easier to understand and apply, reducing compliance costs for both affected retailers and the Authority.

14.14 The Code amendment maintains protections for consumers established by the billing amendment, and builds on these with new clause 1A of Schedule 11A.1and existing provisions operate as intended so that customers have access to information that is relevant to the retailer brand they currently use. For more information on how the underlying billing improvements in the billing amendment promote the Authority's objectives, see the related decision paper and consultation paper on the Authority's website.

Final amendment

Part 11A Consumer Care

…

11A.17 Retailer to publish plan catalogue

(1) Each retailer must **publish** and keep updated a plan catalogue containing the following information:

(a) the name of every **generally available retail tariff plan**:

(b) the **product identification code** for every plan referred to in paragraph (a):

(c) the structure of, and prices available under, every plan referred to in paragraph (a) including GST, if any:

(d) a high-level summary of how the plan is tailored for different customers.

(2) The **retailer** must not charge any person a fee to access the plan catalogue.

<u>(3) Where a **retailer** offers different **product offerings** and **pricing plans** under different brands, the **retailer** may satisfy subclause (1) by **publishing** and keeping updated different plan catalogues for the **retailer's** different brands, each detailing the different **product offerings** and **pricing plans** of the relevant brand only.</u>

…

Schedule 11A.1 — Consumer Care Obligations

Part 1 – Interpretation

…

1A Interpretation where multiple brands used

<u>Where a **retailer** offers different **product offerings** and **pricing plans** under different brands, each reference to available **product offerings** and related **pricing plans** in clauses 8, 17, 17A, 23 and 25 is a reference to the available **product offerings** and related **pricing plans** of the relevant brand only.</u>

…

Schedule 11A.2 — Billing Standards

…

7 Better plan check

(1) Each **retailer** required to perform a **better plan check** for a **customer** must consider whether, based on the **customer's** consumption over the past 12 months, the **retailer** has one or more **pricing plans** that could provide a lower cost of **electricity** to the **customer** taking into account the **customer's** current household circumstances known to the **retailer**.

(2) If the **retailer** reasonably considers that the **retailer** has one or more **pricing plans** that could provide a lower cost of **electricity** to the **customer**, the **retailer** must advise the **customer** of that **pricing plan** or those **pricing plans** (provided the **retailer** does not need to advise the **customer** of more than 3 **pricing plans**).

(3) If the **retailer** advises the **customer** of more than one **pricing plan**, the **retailer** must identify the **pricing plan** which the **retailer** reasonably considers is the lowest cost option for the **customer**, taking into account those aspects of the **customer's** circumstances of which the **retailer** has knowledge.

(4) Where a **retailer** offers different **pricing plans** under different brands, each reference to **pricing plan** in this clause is a reference to the **pricing plans** of the relevant brand only.

15 CRP7-011 Revoke the Authority's power to grant Part 6A dispensations and the definition of specified person

The Authority's proposal

15.1 The Authority proposed to amend the Code to:

(a) revoke the Authority's power to grant Part 6A dispensations under clause 6A.9

(b) clarify the status of dispensations that have already been granted by the Authority under clause 6A.9

(c) change the Code's definition of 'specified person' to refer to the correct provision of the Act.

We have decided to implement the proposal without change

15.2 We have decided to amend the Code as proposed above.

15.3 The Code amendment will come into force on 1 September 2026.

Submissions and the Authority's response

15.4 There were no submissions on this proposal.

The amendment will promote the efficient operation of the electricity industry

15.5 The Code amendments are consistent with the Authority's statutory objectives, and section 32(1)(c) of the Act, because they would contribute to the efficient operation of the electricity industry.

15.6 The Code amendments will improve the efficient operation of the electricity industry by:

(a) removing an unnecessary dispensation power from the Code, clarifying the Authority's functions in relation to exemptions and dispensations, and simplifying processes for participants, and

(b) correcting an erroneous reference in the Code's definitions, and

(c) reducing time spent by participants interpreting exemption requirements under the Code.

15.7 The Code amendments are expected to have no effect on competition and the reliable supply of electricity, or the interest of domestic and small business consumers in relation to the supply of electricity to those consumers.

Final amendment

Part 1 Preliminary provisions

1.1 Interpretation

(1) In this Code, unless the context otherwise requires,—

…

Part 6A dispensation means an exclusion from compliance with Part 6A or any provisions of Part 6A granted by the **Authority** ~~in accordance with the process set out in~~ <u>under</u> clause 6A.9 <u>as it was in effect immediately before 1 September 2026.</u>

…

specified person has the meaning given in section ~~32(6)~~<u>5</u> of the **Act**

…

Part 6A

…

6A.9 ~~Authority may grant~~ Effect of Part 6A dispensation to specified person

~~(1) A **specified person** may apply to the **Authority** for a **Part 6A dispensation** in respect of their involvement in two or more classes of industry **participant** that are the subject of this Part, or specific provisions of this Part.~~

(1A) A **Part 6A dispensation** continues in force until it is amended or revoked in accordance with subclause (6), or until it expires according to its terms.

~~(2) The application must be submitted in the form and by the means specified by the **Authority**.~~

~~(3) Where the **Authority** receives an application under this clause, it may grant a **Part 6A dispensation** to a **specified person** if the **Authority** is satisfied that—~~

~~(a) it is not necessary, for the purpose of achieving the **Authority's** objectives under section 15 of the Act, for the **specified person** to comply with this Part or the specific provisions of this Part; or~~

~~(b) granting a **Part 6A dispensation** in respect of the **specified person** would better achieve the **Authority's** objectives than requiring compliance.~~

~~(4) The **Authority** must give reasons for its decisions under subclause (3).~~

~~(5) The **Authority** may grant a **Part 6A dispensation** on any terms or conditions that it reasonably considers are necessary.~~

(6) The **Authority** may amend or revoke a **Part 6A dispensation** ~~granted under subclause (3)~~ by issuing a notice that identifies the **specified person** subject to the **Part 6A dispensation** and gives reasons for the amendment or revocation, but only if the **Authority**—

(a) has given notice of the proposed amendment or revocation to the **specified person** subject to the **Part 6A dispensation** and given them a reasonable opportunity to comment; and

(b) in relation to an amendment, is satisfied that the amendment is necessary or desirable for the purpose of achieving the **Authority's** objectives in section 15 of the **Act**; and

(c) in relation to a revocation, is no longer satisfied ~~of the matters in subclause (3)~~ that it is not necessary, for the purpose of achieving the **Authority's** objectives under section 15 of the **Act**, for the **specified person** to comply with this Part or the specific provisions of this Part.

(7) The **Authority** must publish a list of all current **Part 6A dispensations**~~ granted under this clause~~.

16 CRP7-012 Amend clauses 10.29B and 10.29C

The Authority's proposal

16.1 The Authority proposed to enable efficient electrical connection and disconnection processes for the grid owner, while ensuring that there is accountability for the electricity when a point of connection is energised, by:

(a) amending clause 10.29B to oblige the connected party (ie, the direct consumer, generator, or distributor) to either:

(i) confirm that one or more traders are identified as responsible for the delivery of submission information, or

(ii) confirm that the distributor is responsible for the delivery of submission information.

(b) expanding the scope of clause 10.29B to permit a designated transmission customer, where connection agreement permits that customer to do so, to electrically connect a point of connection to the grid, and

(c) expanding the scope of clause 10.29C to permit a designated transmission customer, where the connection agreement permits that customer to do so, to electrically disconnect or disconnect a point of connection from the grid, and

(d) replacing clause 10.29C(2)(b) with the right for the grid owner to disconnect a point of connection when it is permitted to do so under its transmission agreement with the designated transmission customer.

We have decided to implement the proposal with no change to its policy intent, but with revised drafting

16.2 We have decided to amend the Code as proposed above with minor changes to the Code drafting to clarify that designated transmission customers may electrically disconnect from the grid subject to the designated transmission customer's transmission agreement. We have also amended the drafting to reflect the obligations for providing Part 15 submission information for reconciliation as opposed to confirming a trader is responsible for settlement for subclauses relating to parties with Part 15 obligations.

16.3 The Code amendment will come into force on 1 September 2026.

Submissions and the Authority's response

16.4 There was one submission on this proposal from Transpower.

16.5 Transpower supported the proposal and suggested drafting refinements to better align with operational practices and Part 15 Code obligations.

Submitter's views – clause 10.29B should distinguish parties that provide submission information, and parties that confirm traders are assigned for settlement

16.6 The policy intent of clause 10.29B is to ensure that, prior to electrical connection to the grid, there is an identified party responsible for providing submission information for reconciliation, and therefore the electricity is paid for through the clearing and settlement process.

16.7 Transpower supported the proposed amendment to clause 10.29B, noting it appropriately recognises that a grid owner may permit a designated transmission customer to electrically connect where a transmission agreement exists. However, it submitted that the drafting would be improved by distinguishing between grid connected generators who are subject to

Part 15 submission information obligations, and other participants, who are not required to provide submission information but must (to achieve the policy intent) confirm that there is a trader responsible for settlement.

Authority response

16.8 We agree that Transpower's recommendation would better give effect to the policy intent, while more accurately reflecting participants' respective obligations to either provide submission information (grid connected generators) or confirm that a trader is responsible for settlement (local network or direct consumer).

Submitter's views – clause 10.29C should allow only for electrical disconnection by the designated transmission customer

16.9 Transpower submitted that the proposed amendments to clause 10.29C appear to enable a designated transmission customer to disconnect from the grid, whereas in practice a designated transmission customer may only *electrically* disconnect, subject to its transmission agreement with the grid owner.

Authority's response

16.10 We agree that the clause should reflect that transmission agreements with designated transmission customers provide may only electrically disconnect, and it should avoid any inadvertent suggestion that disconnection is permitted. Clause 10.29C has been amended to clarify that:

(a) the grid owner may disconnect or electrically disconnect a point of connection to the grid, and

(b) a designated transmission customer may only, with permission under a transmission agreement with the grid owner, *electrically* disconnect a point of connection to the grid.

The amendment will promote the efficient operation of the electricity industry

16.11 The Code amendments are consistent with the Authority's statutory objectives, and section 32(1)(c) of the Act, because it would contribute to the efficient operation of the electricity industry in the following ways:

(a) The Code amendment would continue to ensure that there is a responsible party for the submission of information for the electricity conveyed through a point of connection once energised. However, rather than requiring the grid owner to confirm there is a responsible party, the amendment will place responsibility on the party best placed to give this confirmation, making the process more efficient. It also reduces the potential costs of exemption applications, where the grid owner has contracted with a transmission customer to complete switches, but the Code does not allow for this.

(b) The Code amendment will enable points of connection to be connected or disconnected from the grid in a way that reflects operational practice. This will clarify participants' responsibilities under the Code. It will prevent participants having to apply, and the Authority having to process, applications for exemptions.

(c) The Code amendment will clarify that the grid owner's powers to disconnect or electrically disconnect a point of connection apply only to meet either its Code or transmission agreement obligations.

16.12 The Code amendments are expected to have no effect on competition and the reliable supply of electricity, or the interests of domestic and small business consumers in relation to the supply of electricity to those consumers, or the performance by the Authority of its functions.

Final amendment

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

(1) Subject to clause 10.33A, the only parties who ~~a **grid owner**~~ may **electrically connect** a **point of connection** to the **grid** are— ~~that it owns or operates~~

(a) a **grid owner**; or

(b) a **designated transmission customer**.

(2) A **grid owner** may only **electrically connect** a **point of connection** under subclause (1) if—

(a) in the case of the **electrical connection** of a **direct consumer** ~~or **grid** connected **generator**~~, the **grid owner** has received written confirmation from the **direct consumer** ~~or **grid** connected **generator**~~ that there is a **trader** identified as responsible ~~under Part 15 for the delivery of **submission information**~~ for settlement of the **electricity** conveyed at the **point of connection** from the time of **electrical connection**; or

(b) in the case of the **electrical connection** of a **local network**, the **grid owner** has received written confirmation from the **distributor** for that **local network** that ~~either—~~

~~(i)~~ ~~has one or more **consumers** connected to the **local network** or to an **embedded network** that is connected to the **local network** (either directly or through another **embedded network**~~ one or more **traders** are identified as responsible ~~under Part 15 for the delivery of **submission information**~~ for settlement of the **electricity** conveyed at the **point of connection** from the time of **electrical connection**; or

~~(ii) (c)in the case of the **electrical connection** of a **local network** that has no **consumers** connected to the **local network** or to any **embedded network** that is connected to the **local network** (either directly or through another **embedded network**), if the **distributor** for that **local network** is identified as responsible under Part 15 for the delivery of **submission information** for the **electricity** conveyed at the **point of connection** from the time of **electrical connection**.~~

(c) in the case of a **grid connected generator,** the **grid owner** has received written confirmation from the **grid connected generator** that the **grid connected generator** is responsible under Part 15 for the delivery of **submission information** for the **electricity** conveyed at the **point of connection** from the time of **electrical connection**.

(3) A **designated transmission customer** may only **electrically connect** a **point of connection** to the **grid** under subclause (1) if—

(a) the **designated transmission customer** and the **grid owner** have a **transmission agreement** in place that permits the **designated transmission customer** to **electrically connect** that **point of connection** to the **grid**; and

(b) the **designated transmission customer** is, or one or more **traders** are identified as, responsible under Part 15 for the delivery of **submission information** for the **electricity** conveyed at the **point of connection** from the time of **electrical connection**.

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

(1) Subject to subclause (2), only a **grid owner** ~~or **designated transmission customer**~~ may—

~~(a) **electrically disconnect** a **point of connection** to the **grid**; or~~

~~(b)~~ disconnect a **point of connection** to the **grid**.

(1A) Subject to subclauses (2) and (3), only a **grid owner** or **designated transmission customer** may **electrically disconnect** a **point of connection** to the **grid**.

(2) 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—

(a) under an enactment, including this Code; or

(b) under its ~~contract~~ **transmission agreement** with the ~~party~~ **designated transmission customer** ~~identified in clause 10.29B(2) as responsible in accordance with Part 15 for the delivery of **submission information** for the **electricity** conveyed~~ at the **point of connection** ~~to the **grid**~~.

(3) A **designated transmission customer** may ~~disconnect or~~ **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**.

17 CRP7-013 Access to ICP for disconnection

The Authority's proposal

17.1 The Authority proposed to add a new subclause to clause 3 of Schedule 11.1 that clarifies that a distributor may only create an ICP identifier or connect an ICP if it has been established that there is an accessible point to electrically disconnect the ICP.

We have decided to implement the proposal with no change to its policy intent, but with revised Code drafting

17.2 We have decided to amend the Code as proposed above with a minor change to the Code drafting in response to a submission, as discussed in paragraphs 17.14 and 17.15.

17.3 The Code amendment will come into force on 1 September 2026.

Submissions and the Authority's response

17.4 There were five submissions on this proposal.

17.5 One submitter supported the proposal, and two submitters agreed with the policy intent but did not support the proposal as drafted. Two submitters did not support the proposal.

Submitter's views – obligations relate to matters which change over time

17.6 Three submitters noted concern that the amendment would place obligations on distributors which relate to matters that can change over time, such as property access and ownership.

Authority's response

17.7 The Authority notes that a distributor's obligations under this amendment apply at the time an ICP identifier is created or the ICP is connected. Where ownership changes later affect access for electrical disconnection, the distributor will have met its obligations if the requirements of the subclause were met at the time of the ICP creation or connection.

17.8 We emphasise that the intent of this obligation is to reduce scenarios where unsuccessful site visits for disconnection occur due to inaccessibility, but recognise that the amendment cannot prevent all inaccessibility issues that may occur due to subsequent ownership or property changes.

Submitters' views – distributors cannot meet obligations in respect to downstream networks

17.9 One submitter was concerned that the amendment assumes that all distributors can ensure all ICPs are physically accessible for disconnection, which would be particularly unrealistic in the case of network extensions and other secondary network arrangements.

Authority's response

17.10 The distributor is required by Part 11, Schedule 11.1, clause 1, to create an ICP identifier for each ICP on each network for which the distributor is responsible. Therefore, obligations for confirming the additional requirements of new subclause (c) appropriately rests with the distributor responsible for that network. We note that the existing clause already requires the confirmation that the ICP can be electrically disconnected without electrically disconnecting another ICP.

Submitters' views – confirming obligation will delay ICP creation

17.11 One submitter expressed concerns that awaiting resolution of any issues regarding access to an isolation point for the ICP would delay ICP creation or connection.

Authority's response

17.12 While we agree that to confirm any issues regarding access may involve some investigation which delays the ICP creation, the intent of the proposal is to resolve those issues before the ICP identifier is created and therefore avoid the associated costs of inaccessibility when electrically disconnecting an ICP.

Submitter's views – access should be to the isolation point, by a technician

17.13 One submitter raised concerns that the drafting requires the 'ICP' to have reasonable access to enable the ICP to be electrically disconnected, whereas it is the 'isolation point' that must be accessed for disconnection to occur. The submitter also noted that access is required by the technician carrying out the disconnection, rather than by the owner.

Authority's response

17.14 We agree that subclauses (1), paragraphs (c)(i) and (c)(ii) would benefit from clearer drafting as to what must be reasonably accessible. We have amended these clauses to specify that is the isolation point that must have reasonable access for an ICP identifier to be created or ICP to be connected.

17.15 While access is required by a retailer or distributor's technician carrying out the disconnection, the distributor's right of access arises from the permissions granted by the consumer to its retailer. It is therefore the degree of access which the consumer's right of access confers on the distributor that is the key matter to consider. We have amended the drafting to reflect this.

The amendment will promote the efficient operation of the electricity industry

17.16 The Code amendment is consistent with the Authority's statutory objectives, and section 32(1)(c) of the Act, because it would contribute to the efficient operation of the electricity industry.

17.17 The Code amendment will improve the efficient operation of the electricity industry by helping to prevent scenarios where an ICP cannot be disconnected due to an inaccessible location. This will lead to a reduction in unsuccessful visits to the location because of inaccessibility.

17.18 The Code amendment is expected to have no effect on competition and the reliable supply of electricity, or the interests of domestic and small business consumers in relation to the supply of electricity to those consumers, or the performance by the Authority of its functions.

Final amendment

Schedule 11.1 clause 3 Electrically disconnecting

(1) Subject to subclause (2), a **distributor** must not create an **ICP identifier** or connect an **ICP** created after 7 October 2002 unless—

(a) the **ICP identifier** is for an **ICP** that can be **electrically disconnected** without **electrically disconnecting** another **ICP**; ~~and~~

(b) the **ICP** can be **electrically disconnected** without **electrically disconnecting** another **ICP**;

(c) for **ICPs** created after 1 September 2026, there is reasonable access to enable the **ICP** to be **electrically disconnected** and either of the following applies —

(i) the isolation point to which access is needed to enable **electrical disconnection** of the **ICP** is located at the premises at which the **electricity** conveyed from the **ICP** is consumed; or

(ii) the ~~owner of~~ **consumer** at the premises at which the **electricity** is conveyed from the **ICP** is consumed has a right of access to the isolation point to which access is needed to enable **electrical disconnection** of the **ICP**.

(2) Subclause (1) does not apply if the **ICP** is—

(a) the **point of connection** between a **network** and an **embedded network**; or

(b) an **ICP** that represents the consumption calculated by the difference between the total consumption for the **embedded network** and all other **ICPs** on the **embedded network**.

(3) A **distributor** must not—

(a) connect a new **ICP** to an existing **ICP** in series unless the existing **ICP** is of the type described in subclause (2)(a) or (2)(b); or

(b) create a new **ICP identifier** for a new or existing **ICP** in series with an existing **ICP** unless the existing **ICP** is of the type described in subclause (2)(a) or (2)(b) and the **distributor** is responsible for both the new and existing ICPs.

18 CRP7-014 Clearing manager’s payment obligations and the clearing manager’s liability to pay interest

The Authority’s proposal

18.1 The Authority proposed to:

(a) amend clause 14.34 to provide more flexibility to the clearing manager’s payment obligations when delays occur that are outside the clearing manager’s control

(b) amend clause 14.64 to clarify that the clearing manager is only liable to pay interest in the circumstances to which subpart 8 of Part 14 applies.

18.2 The Authority proposed to provide more flexibility to the clearing manager’s payment obligations under clause 14.34 because delays can occur that are outside the clearing manager’s control, such as late participant payments or banking-processing delays. The Authority proposed to relax the strict obligation to have made payment by the 4pm deadline by:

(a) changing the clearing manager’s obligation under clause 14.34(1) to an obligation to have issued bank payment instructions by 4pm and

(b) changing the strict obligation under clause 14.34(2) to pay in cleared funds to an obligation to “use reasonable endeavours” to pay in cleared funds.

18.3 The amendment proposed to clause 14.64 was intended to state that the clearing manager’s liability to pay interest applies only in situations relating to late payment or a shortfall in funds from a participant. The amendment would clarify that the clearing manager is not liable for interest payments in other situations.

We have decided to implement the proposal with no change to its policy intent, but with revised Code drafting

18.4 We have decided to amend clause 14.34 but with minor changes to the drafting proposed in the consultation paper.

18.5 We have decided to proceed with the amendment to clause 14.64 of the Code as proposed in the consultation paper.

18.6 The Code amendment will come into force on 1 September 2026.

Submissions and the Authority’s response

18.7 There was one submission on this proposal from ERGANZ.

Submitter’s views – clearing manager’s payment obligations

18.8 ERGANZ noted that the proposed amendment to clause 14.34 risks shifting the timing risk of the clearing manager’s payment obligations from the clearing manager to payees.

18.9 ERGANZ accepted that the clearing manager should not be exposed to a Code breach for causes outside its control. However, it emphasised that payment-timing certainty is important for participants to manage their cash and prudential positions around expected settlements from the clearing manager. While accepting the operational case for change, it wished to ensure that the practical change is expected to be negligible in normal banking conditions, and that the change is not expected to delay receipts as a matter of routine.

Authority's response

18.10 We acknowledge the concerns raised by ERGANZ. We do not expect the proposed amendment to clause 14.34(1) to change the timing of payment receipts in normal banking conditions. We expect the clearing manager will retain its current operational payment practice and that we will work with the clearing manager to monitor timeliness of payment going forward.

18.11 We have also decided to make two minor changes to the proposed amendment to clarify it based on the policy intent on which we consulted:

(a) We have made a minor change to clause 14.34(1) to clarify that the 4pm deadline relates to the issuance of payment instructions.

(b) We do not consider the proposed addition of a 'reasonable endeavours' qualifier to the obligation to pay in cleared funds in clause 14.34(2) was necessary to achieve our policy objectives. This should provide further assurance that the proposed change is not expected to delay receipts as a matter of routine.

The amendment will promote the efficient operation of the electricity industry

18.12 The Code amendments are consistent with the Authority's statutory objectives, and section 32(1)(c) of the Act, because they would contribute to the efficient operation of the electricity industry by:

(a) relaxing a strict obligation on a market operation service provider which can be difficult to meet, due to causes beyond the control of the clearing manager; and

(b) clarifying the circumstances in which the clearing manager is liable to pay interest on unpaid amounts.

18.13 The Code amendments are expected to have no effect on competition and the reliable supply of electricity, or the interests of domestic and small business consumers in relation to the supply of electricity to those consumers, or the performance by the Authority of its functions.

Final amendment

14.34 Payments by clearing manager

(1) Subject to subparts 7 and 8, the **clearing manager** must <u>issue payment instructions to the **bank** with which each **operating account** is held by 1600 hours on the final **business day** for payment under clause 14.31, to</u> pay each **participant** the amount advised to the **participant** under subpart 4 as payable by the **clearing manager** to the **participant** ~~by 1600 hours on the final **business day** for payment under clause 14.31~~.

(2) The **clearing manager** must ~~use reasonable endeavours to~~ pay each **participant** in **cleared funds**.

14.64 Interest payable to participants

(1) If a **participant** does not receive the full amount payable under this Part <u>and subpart 8 applies,</u> the **clearing manager** is liable to pay interest on the unpaid amount.

19 Technical and non-controversial amendments

19.1 The consultation paper included a list of 27 amendments that the Authority is satisfied on reasonable grounds are technical and non-controversial (TNC) under section 39(3)(a) of the Act. These amendments do not require consultation or a regulatory statement but were included the consultation paper for comment.

19.2 There were no submissions on the TNCs. We have decided to make these TNC amendments under section 39(3)(a) of the Act.

19.3 There are four additional amendments which were not included in the list in the consultation paper. These are outlined below and relate to:

(a) the other asset owner performance obligations

(b) the need to undertake a prevailing load test when certifying or recertifying metering installations

(c) submission of risk management contract information and

(d) the use of half hourly data for reconciliation.

19.4 Under section 39(3) of the Act, the Authority does not need to consult on these four additional amendments, but they are published in this decision paper before the Code is amended as required under section 39(1)(a).

19.5 All TNC amendments the Authority has decided to make are consistent with the Authority's objectives as they will contribute to the efficient operation of the electricity industry by clarifying, or removing typographical errors from, Code obligations.

19.6 The Code amendments will come into force on 1 September 2026, except for the amendment to clause 15.28 which will come into effect on 1 October 2026.

Other asset owner performance obligations

19.7 The Electricity Industry Participation Code (Connected Asset Commissioning, Testing and Information Standard) Amendment 2026 was made on 26 May 2026 and came into force on 1 July 2026.

19.8 We have identified a minor error with the amendment to clause 8.25 in relation to the provision of information to the system operator by embedded generators. The amendment introduced a new process in clause 8.25(7) for how information is to be provided without deleting the former procedure under clause 8.25(6). Clause 8.25(6) should therefore be amended as follows:

Clause 8.25 Other asset owner performance obligations and technical standards

…

(6) If the **system operator** reasonably considers it necessary to assist it in planning to comply, and complying, with the **principal performance obligations** and achieving the **dispatch objective**, the **system operator** may apply to the **Authority** to require an **embedded generator** to provide information regarding the intended output of a group of **embedded generating stations** that total greater than 10 **MW** in capacity and that are connected to the same **grid exit point**. ~~If the **Authority** approves the **system operator's** request, the information must be provided to the **system operator** by the relevant **embedded generator** in a form and manner determined by the **Authority**.~~

(7) If the **Authority** approves the **system operator's** request under subclause (6), the **embedded generator** must provide the information in accordance with the **connected asset commissioning, testing and information standard**.

19.9 The Authority is satisfied that this minor correction does not require consultation, pursuant to section 39(3) of the Act. The nature of this amendment is technical and non-controversial.

Selected component certification and comparative recertification minimum test requirements

19.10 Table 3 of Schedule 10.1 of the Code governs, among other things, when a prevailing load test must be undertaken when certifying or recertifying metering installations.

19.11 The Table was substantially revised to its current form through the Electricity Industry Participation Code Amendment (Metering and Related Registry Processes) 2020. The intent behind this amendment was that no prevailing load test should be required for recertification when the existing expiry date of a meter is not changed.

19.12 We have identified a minor error with Table 3. It does not address the situation where there is only one meter at an ICP and it is recertified without changing the meter's expiry date. As currently drafted, only row 2 of the Table would apply which would require an unnecessary prevailing load test, thereby driving up costs.

19.13 Table 3 should therefore be amended as follows to clarify when a prevailing load test is not required.

	Event	Design check	Prevailing load test
Category 1 metering installations	Initial certification, or recertification with all meters replaced	M	
	Recertification with no meters replaced and metering installation expiry date is changed	M	M
	Recertification with ~~one or more meters replaced with a certified meter(s),~~ at least one existing meter remainings, and metering installation expiry date is not changed	M	
	Recertification with ~~one or more meters replaced with a certified meter(s),~~ at least one existing meter remainings (which must have calibration that is valid for the new certification period), and metering installation expiry date is changed	M	M

19.14 The Authority is satisfied that this minor amendment does not require consultation, pursuant to section 39(3) of the Act. The nature of this amendment is technical and non-controversial.

Submission of risk management contract information

19.15 The Electricity Industry Participation Code (Hedge Disclosure Obligations) Amendment 2026 was made on 13 May 2026 and comes into effect on 1 August 2026. The amendment makes changes to the information parties to a risk management contract are required to submit to the approved system.

19.16 Since making the Code amendment, we have identified two minor errors with clause 13.219(1)(gb). First, the subclause numbering has typological errors. Second, there has been the inadvertent omission of the requirement to disclose the node at which each price is set. Clause 13.219(1)(gb) should instead read:

(gb) if the contract is or includes a demand response contract—

(i) the **demand response price**, if specified in the contract:

(ii)the **node** at which each price is set:

~~(ii)~~(iii) if no **demand response price** is specified, whether consideration for exercising a right to demand response in the contract is linked to:

(A) price(s) in the contract referred to in paragraph (l); or

(B) other agreements between the parties (in which case, this must be specified):

~~(iii)~~(iv) the minimum and maximum duration of demand response provision under the contract:

~~(iv)~~(v) the specified volume of **electricity** by which consumption may be reduced:

~~(iii)~~(vi) the minimum notice period prior to exercising a right to demand response:

~~(iv)~~(vii) the limits, if specified, on repeated use of the demand response provisions:

~~(v)~~(viii) the **demand response premium**, if specified in the contract:

19.17 The Authority's decision paper itself contains the correct information, but the Code amendment needs to be corrected to align with it.

19.18 The Authority is satisfied that this minor correction does not require consultation, pursuant to section 39(3) of the Act. The nature of this amendment is technical and non-controversial.

Requiring the use of half-hourly data for reconciliation

19.19 The Electricity Industry Participation Code (Half Hourly Data for Reconciliation) Amendment 2026 was made on 30 March 2026 and comes into effect on 1 October 2026. The amendment requires electricity traders to submit aggregated half-hourly volume information to the reconciliation manager for all ICPs where there is a half-hour capable meter installed. We also amended the timeframes for settlement washups.

19.20 Since making the Code amendment, we have identified two minor errors in clause 15.28(3A) which relates to arrangements during the transition period for the changes to the washup timeframes. Specifically, the references to "July 2025" should instead read "August 2025":

Clause 15.28 (Transitional provisions concerning revisions)

…

(3A) If the **reconciliation manager** receives revised **submission information** for ~~July~~ August 2025, the **reconciliation manager** must conduct a further reconciliation for ~~July~~ August 2025 while performing further reconciliation for other revisions received during October 2026, notwithstanding clause 15.27(1)(b).

19.21 The decision paper itself contains the correct information, but the Code amendment needs to be corrected to align with it.

19.22 The Authority is satisfied that this minor correction does not require consultation, pursuant to section 39(3) of the Act. The nature of this amendment is technical and non-controversial.

Final amendment

	Clause	Issue	Proposed amendment
1.	Clause 1.1 definition of 'active meter'	The defined term is not used in the Code and should be removed.	~~**active meter** means a **meter** used for the measurement of **active energy**~~
2.	Clause 1.1 definition of 'Consumer Price Index'	The word 'published', as it is used here, is not a defined term and should not be in bold.	**Consumers Price Index** means the Consumers Price Index (all groups) published by Statistics New Zealand or, if that index ceases to be ~~**published**~~ published, any measure certified by the Government Statistician as being equivalent to that index
3.	Clause 1.1 definition of 'distributor kvar reference node'	Amendments in 2015 rationalised the definition of 'distributor' and 'connected asset owner'. As a result, clause 8.67 now refers to 'connected asset owner kvar reference node' as the relevant defined term. However, the 2015 amendments did not change the related definition in Part 1. The former definition, 'distributor kvar reference node', remains and needs updating.	~~**distributor**~~ **connected asset owner kvar reference node** means a notional node that represents a group of **grid exit points** within a **zone** for which a **distributor** nominates peak demand in kvar, and for which the individual kvar quantities measured at the individual **grid exit points** within the group are aggregated for **voltage support** charging purposes, as approved by the **system operator** (such approval not to be unreasonably withheld)
4.	Clause 17(1)(a) of Schedule 6.1	The term 'the first application' is not a defined term and should not be in bold.	(a) a **distributor** receives a **final application** (the ~~**first application**~~ first application); and
5.	Clause 6B.4(1)	The term 'capacity' is not a defined term and should not be in bold.	(1) Subject to subclauses (2) to (4), each **distributor** in determining the **connection charges** that it requires a **connection applicant** to pay for or in respect of a **connection** or any increase in security or ~~**capacity**~~ capacity at a **point of connection** or for an **asset**—
6.	Clause 6B.7(5)	The term 'purchasing distributor' should refer instead to 'buying distributor'.	(5) If a **pioneer scheme** is an **acquired pioneer scheme**, the ~~**purchasing**~~ **buying distributor**—
7.	Clause 6B.7(5)(b)	The term 'must' is not a defined term and should not be in bold.	(b) ~~**must**~~must continue to administer, and comply with, those requirements and that **pioneer scheme policy** in complying with this clause and clauses 6B.8 and 6B.9.
8.	Clause 6B.9(1)(c)	The term 'details' is not a defined term and should not be in bold	(c) **publish** the ~~**details**~~ details of each **pioneer scheme** it administers, applying the requirements in clause

	Clause	Issue	Proposed amendment
			6B.7, including the following information:
9.	Clause 6B.11(4)	The clause refers to the 'incremental distribution revenue and incremental transmission revenue estimates' when it should refer to 'incremental distribution revenue estimate and incremental transmission revenue estimate'.	(4) A **distributor** must assess the **incremental distribution revenue estimate** and **incremental transmission revenue** ~~estimates~~ **estimate**, and show this assessment in the connection charge reconciliation, by—
10.	Clause 6B.11(4)(d)	The reference to 'incremental distribution revenue' is missing the word 'estimate'. The word 'the' before 'incremental cost estimate' should not be in bold.	(d) for an **incremental distribution revenue estimate** only, and only where ~~**the**~~ the **incremental cost estimate** includes an **operating cost loading** which is not zero, multiplying the amount derived after the application of paragraph (c) by the **distributor's incremental opex scaling factor** calculated in accordance with subclause (5).
11.	Clause 7.18(4)	The word 'to' should be removed from the wording 'does not to consent to'.	(4) If the **Authority** does not ~~to~~ consent to a proposal for consultation under subclause (3), the **system operator** must decide either**—**
12.	Clause 8.25(6)	The last sentence to the clause should be deleted. A new process for how information is to be provided is now governed by subclause (7) and the process in the last sentence of (6) is now obsolete.	(6) If the **system operator** reasonably considers it necessary to assist it in planning to comply, and complying, with the **principal performance obligations** and achieving the **dispatch objective**, the **system operator** may apply to the **Authority** to require an **embedded generator** to provide information regarding the intended output of a group of **embedded generating stations** that total greater than 10 **MW** in capacity and that are connected to the same **grid exit point**. ~~If the **Authority** approves the **system operator's** request, the information must be provided to the **system operator** by the relevant **embedded generator** in a form and manner determined by the **Authority**.~~
13.	Table 3 of Schedule 10.1	Through amendments to the 'Event' column, the Table should clarify that no prevailing load test is required when metering installations are recertified and their expiry date is not changed.	[Row 2] Recertification with no meters replaced and metering installation expiry date is changed [Row 3] Recertification with ~~one or more meters replaced with a certified meter(s),~~ at least one existing meter remaining~~s~~, and metering installation expiry date is not changed [Row 4] Recertification with ~~one or more meters replaced with a certified meter(s),~~ at least one existing meter remaining~~s~~ (which must have calibration that is valid for the new

	Clause	Issue	Proposed amendment
			certification period), and metering installation expiry date is changed
14.	Clause 11.5(2)(b)	There is an incorrect reference to clause 11.6. The correct reference should be 11.16.	(b) for all other **traders**, an arrangement with the **distributor** for **distribution** services in accordance with clause 11.16.
15.	Clause 11.30B(5)	There is an incorrect reference to clause 11.30A. The reference should be 11.30B.	(5) If the **Authority** changes the web address of the electricity plan comparison website, establishes a new platform to perform the same purpose, or changes that platform or its location descriptor, each **retailer** must change the information published or provided under clause 11.30~~A~~B to refer to the new address, platform or location descriptor as soon as reasonably possible and no later than 3 months from the date the change is notified on the **Authority's** website.
16.	Clause 11.32EA(2)(a)	The semicolon at the end of the clause should not be in bold.	(a) consider whether any further information could reasonably be provided by the agent to satisfy the **retailer**~~**;**~~; and
17.	Clause 7(6) of Schedule 11.1	There should be a space between '10' and 'MW' in the reference to '10MW'.	(6) If a **distributor** assigns a **loss category** code to an **ICP** on the **distributor's network** that connects the **distributor's network** to an **embedded generating station** that has a capacity of ~~10MW~~ 10 **MW** or more—
18.	Clause 48(2) of Schedule 11A.1	The wording "…which must be least 21 business days…" is missing the word "at".	(2) The **retailer** must advise the **customer** or **residential consumer** under subclause (1) that if the **retailer** does not receive an application (in any form) within a period specified by the **retailer**, which must be at least 21 **business days**, the **retailer** may decide to no longer regard that **customer** or **residential consumer** as someone who may be a **medically dependent consumer**.
19.	Clause 12A.7(1)	The reference '…designed to target residential or business consumers…' should be '…designed to target residential consumers or business consumers…'	(1) A **distributor's** pricing methodology must, for any **price category** that has eligibility criteria that are designed to target residential consumers or business consumers with a connection capacity of 45kVA or less, include a negative charge for injection of **electricity** into the **distributor's network** that:
20.	Clause 12A.7(1A)	The reference to '…is not required to be offered or paid to any distributed generation…' should be '…is not	(1A) Despite subclause (1), a negative charge for injection of **electricity** is not required to be offered or paid ~~to~~ in respect of any **distributed generation**

	Clause	Issue	Proposed amendment
		required to be offered or paid in respect of any distributed generation'	with maximum deliverable generation capacity of more than 45kW in total across three phases.
21.	Clause 6 of Schedule 12A.4	Row 1 – column 1 of the table includes the wording “1 one” when it should just be “one”.	Each **distributor** that owns or operates a **local network**, and has an **interposed arrangement** with ~~1~~ one or more **traders** trading on the **local network**
22.	Clause 13.6(3)	The clause uses “1st time” which should be changed to “first time”.	(3) Despite subclauses (1) and (2), a **generator** must give at least 5 **business days'** notice in writing to the **system operator** and the **clearing manager** before the **generator** makes an **offer** for the ~~1st~~ first time in respect of the **generating plant** that is the subject of the offer.
23.	Clause 13.219(1)(gb)	The number of the subclauses is not sequential and the clause inadvertently omits reference to ‘the node at which each price is set’.	(gb) if the contract is or includes a demand response contract— (i) the **demand response price**, if specified in the contract: (ii) the **node** at which each price is set: ~~(ii)~~(iii) if no **demand response price** is specified, whether consideration for exercising a right to demand response in the contract is linked to: (A) price(s) in the contract referred to in paragraph (I); or (B) other agreements between the parties (in which case, this must be specified): ~~(iii)~~(iv) the minimum and maximum duration of demand response provision under the contract: ~~(iv)~~(v) the specified volume of **electricity** by which consumption may be reduced: ~~(iii)~~(vi) the minimum notice period prior to exercising a right to demand response: ~~(iv)~~(vii)the limits, if specified, on repeated use of the demand response provisions: ~~(v)~~(viii) the **demand response premium**, if specified in the contract:
24.	Clause 2 definition of ‘floating price’ in Form 1 of Schedule 14.4	The definition of ‘floating price’ is missing the word ‘calculated’	**floating price** means, in relation to a **calculation period**, the **final price** per **MWh** for that **calculation period** calculated by reference to the **hedge reference point** [rounded to two decimal places]
25.	Clause 2 definition of ‘floating price’ in Form 2 to Schedule 14.4	The definition of ‘floating price’ is missing the word ‘calculated’	**floating price** means, in relation to a **calculation period**, the **final price** per **MWh** for that **calculation period** calculated by reference to the **hedge**

	Clause	Issue	Proposed amendment
			reference point [rounded to two decimal places]
26.	Clause 2 definition of 'floating price' in Form 3 of Schedule 14.4	The definition of 'floating price' is missing the word 'calculated'	**floating price** means, in relation to a **calculation period**, the **final price** per **MWh** for that **calculation period** <u>calculated</u> by reference to the **hedge reference point** [rounded to two decimal places]
27.	Clause 2 definition of 'floating price' in Form 4 to Schedule 14.4	The definition of 'floating price' is missing the word 'calculated'	**floating price** means, in relation to a **calculation period**, the **final price** per **MWh** for that **calculation period** <u>calculated</u> by reference to the **hedge reference point** [rounded to two decimal places]
28.	Clause 2 definition of 'maximum variable quantity' in Form 4 of Schedule 14.4	The term 'MWh' is a defined term and should be in bold.	**maximum variable quantity** means the maximum amount in ~~MWh~~**<u>MWh</u>** that the variable quantity must not exceed
29.	Schedule to Form 4 of Schedule 14.4	The term 'MWh' referred to twice in this schedule is a defined term and should be in bold.	Baseload: [insert amount] ~~MWh~~**<u>MWh</u>** Maximum variable quantity: [insert amount] ~~MWh~~**<u>MWh</u>**
30.	Clause 15.28(3A)	The references to 'July 2025' wrongly refer to 'August 2025' and should be corrected.	If the **reconciliation manager** receives revised **submission information** for ~~July~~ <u>August</u> 2025, the **reconciliation manager** must conduct a further reconciliation ~~July~~ <u>August</u> 2025 while performing further reconciliation for other revisions received during October 2026, notwithstanding clause 15.27(1)(b).
31.	Clause 17.1(3)	Amendments in 2015 rationalised the definition of 'distributor' and 'connected asset owner'. As a result, the Code now refers to 'connected asset owner kvar reference node' as the relevant defined term. However, the 2015 amendments did not change clause 17.1(3). The former definition, 'distributor kvar reference node', remains and needs updating.	A distributor kvar reference node approved by the system operator in accordance with the definition of distributor kvar reference node in rule 1 of part A of the **rules** that was in force immediately before this Code came into force, is deemed to be a ~~**distributor**~~ **<u>connected asset owner</u>** **kvar reference node** approved by the **system operator** in accordance with the definition of ~~**distributor**~~ **<u>connected asset owner</u>** **kvar reference node** in clause 1.1(1).