



12 August 2026

Electricity Authority
PO Box 10041
Wellington

Email to: consumercareconsultation@ea.govt.nz

Dear Electricity Authority

Re: Omnibus #7 Consultation

Thank you for the opportunity to submit on this consultation paper. Our feedback focuses on section 6 of the consultation paper (question 6.1) which proposes to amend part 8 of the Code to require annual director certification with AUFLS Code requirements.

NZ Steel recognises the importance of the Automatic Under-Frequency Load Shedding (AUFLS) scheme in supporting power system security and reliability. However, we do not support the proposed requirement for annual director certification.

AUFLS providers are already subject to detailed technical, testing and reporting obligations, with annual data submissions provided to the System Operator. AUFLS compliance is highly technical in nature. In practice, directors would likely need to rely on advice from technical specialists and management when making such certifications. The consultation paper has not demonstrated how this proposed requirement would materially improve AUFLS compliance outcomes and readiness.

The cited lack of response to a voluntary request for certification does not necessarily indicate inadequate compliance, poor governance or lack of robust processes and should not in itself lead to the compliance concerns expressed.

We consider that the current requirements are sufficient to enable the System Operator to effectively assess compliance and ensure AUFLS readiness.

Please contact us if you would like to discuss our submission further.

Regards

Mike Seabrook

Michael Seabrook
New Zealand Steel