

11 Aug 2026

Electricity Authority

By email to: consumercareconsultation@ea.govt.nz

Tēnā koutou,

Consultation on 'Code amendment omnibus #7'

Thank you for the opportunity to provide feedback on the consultation paper. Our submission is focused on the proposal to amend Part 8 of the Code to require annual director certification of compliance with AUFLS Code requirements.

Simply Energy is an existing AUFLS provider to multiple industrials. Our services include the hardware, software and ongoing management of data and testing requirements. During the development phase of our AUFLS service we engaged extensively with the System Operator (SO) to understand the requirements in the Code, AUFLS Technical Requirements (ATRs) and the Distribution Asset Testing Requirements.

Whilst our AUFLS system has been designed and implemented based on the documents mentioned above, in our view certain requirements, in particular relating to the specified test procedures, are complex and benefit from a degree of interpretation and direction from the SO. Post the setup testing we did in late 2024, we submitted a large number of final commissioning test results via the SO customer portal. Although the SO supported us developing our understanding of the requirements, we have not had feedback on whether the final test results and logging met the requirements.

AUFLS is a very technical system and we query whether company directors are in a position to assess whether technical performance requirements have been met. Directors would likely need to fall back on expert and management advice, which in our view would shift accountability without necessarily improving compliance outcomes. There are very few technical experts in the AUFLS field and industrial customers are often very reliant on external service providers. Simply Energy is closer to the requirements than the industrials we work for, and yet we would not consider ourselves experts qualified to sign off on compliance with the Code and associated technical documents.

We believe the SO is best placed to assess compliance. It is the owner of the AUFLS Technical Requirements (ATRs) and the Distribution Asset Testing Requirements, it has the engineering and technical specialists, and it receives the test and annual profile data. Ultimately the SO is responsible for power system security, including the Principal Performance Obligations (PPOs) in the Code. We also note that no director certification is required for Interruptible Load (IL) participation in the reserves market, and the SO is responsible for test procedure requirements and assessing test results for both upfront approval purposes as well as post event compliance.

In summary, we do not believe AUFLS compliance is suitable for director certification from a governance perspective, and the proposed approach is not an efficient way to achieve compliance. The EA should not proceed with the proposal and instead focus on achieving SO-led compliance as originally intended.

We are happy to share our experience as an AUFLS service provider with the Authority.

Please contact rob.prest@simplyenergy.co.nz or luke.cartmell-gollan@simplyenergy.co.nz if you wish to discuss further.

Ngā Mihi,

A handwritten signature in black ink that reads "Rob Prest".

Rob Prest
Simply Energy

A handwritten signature in black ink that reads "Luke Cartmell-Gollan".

Luke Cartmell-Gollan
Simply Energy