

Appendix G Format for submissions

Code amendment omnibus #7

Please email your submission to consumercare@ea.govt.nz by 5pm, 12 August 2026.

Submitter	Wellington Electricity
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Annual director certification of compliance with AUFLS obligations	
Questions	Comments
Q6.1. Do you support the Authority's proposal to require annual director certifications of compliance with AUFLS obligations? Please explain your answer.	Wellington Electricity does not support the proposed requirement for directors to certify AUFLS disclosures. Directors are primarily responsible for governance and oversight rather than the technical verification of operational disclosures. Requiring director certification of these disclosures would blur the distinction between governance and operational management.
Q6.2. Do you agree that the benefits of the proposed Code amendment outweigh its costs?	We consider that this requirement would impose additional administrative burden without providing a commensurate improvement in assurance.
Q6.3. Do you agree the proposed amendment is preferable to the alternative options considered? If not, please explain your preferred option and how would better promote the Authority's statutory objective in section 15 of the Electricity Industry Act 2010.	
Q6.4Do you agree with the analysis presented in this Regulatory Statement? If not, why not?	
QE.1. Do you agree with the proposed Code amendment drafting? If not, why not?	