

26 September 2023

Electricity Authority
Wellington
New Zealand

Email: distribution.feedback@ea.govt.nz

Submission – Consultation on Code Review Programme number 5

Introduction

1. Orion appreciates the opportunity to submit on the Consultation¹ seeking feedback on the Electricity Authority's (the Authority) review of the Code from industry stakeholders by 10 October 2023.
2. The 23 Code amendment proposals in the consultation paper cover a broad range of topics that seek to:
 - update and clarify different definitions in the Act
 - address gaps in various Code provisions
 - reduce unnecessary delay in Code provisions becoming effective
 - clarify obligations on participants
 - update the Code to respond to developing technology and changing operational practices.

Summary

3. Overall, we welcome and support the Authority's proposal to update this section of the Code, especially to broaden definitions to include a wider range of participants and clarifying facility for embedded networks.

¹ <https://www.ea.govt.nz/projects/all/code-review-programme/consultation/code-review-programme-5/>

Other feedback on the consultation

4. We note that there are a few **spelling errors** and one clarification which needs to be reviewed, these are:

- Page 60 of the Code Review consultation paper²

“Problem 2

To address Problem 2, the Authority proposes to:

- a) replace the defined term **‘electricial** ‘installation’ with a new defined term, **‘electricial facility’**,

- Page 61 of the Code Review consultation paper

“decommissioning means—

- (a)(iii) a metering installation **associated** with a point of connection; or

- Page 90 of the Code Review consultation paper, confirm that it should have **“not”** included:

- (3) The Authority must **not** advise the participant of a date under subclause (2) that is any earlier than 3 months after the date that the Authority gives the advice to the participant.

Concluding Remarks

Thank you for the opportunity to provide feedback. We do not consider any part of this feedback as confidential.

If you have any questions or queries or aspects of the submission which you would like to discuss, please contact Orion on 03 363 9898.

Yours sincerely

Rob Tweedie

Regulatory Manager

² [https://www.ea.govt.nz/documents/3630/Consultation_paper - Code_review_programme_5.pdf](https://www.ea.govt.nz/documents/3630/Consultation_paper_-_Code_review_programme_5.pdf)