

12 August 2025

Future Security and Resilience Team  
Electricity Authority  
P O Box 10-041  
Wellington

By email: [fsr@ea.govt.nz](mailto:fsr@ea.govt.nz)

Dear team,

**Re: Consultation Paper—Promoting reliable electricity supply – a common quality-related information Code amendment proposal**

The Electricity Authority has issued the consultation ‘Consultation Paper—Promoting reliable electricity supply – a common quality-related information Code amendment proposal’ and Buller Electricity Limited (BEL) appreciates the opportunity to make a submission.

BEL is a consumer owned electricity distributor delivering 51GWh of electricity to our 4,900 customers in the northern part of the West Coast of the South Island - from Meybille Bay in the south (5km north of Punakaiki), to Karamea in the north. Much of this area is rural incorporating significant dairy and beef farming, with Westport township being the main population base. As a consumer owned business, we are focused on delivering reliable and affordable electricity for our customer shareholders.

The cost for Buller’s customers of being connected to New Zealand’s transmission grid and power system is a quarter of their cost for electricity. We are therefore motivated to ensure that policy and Code changes have a positive net economic benefit.

This submission focuses on three aspects of the proposals:

1. As a key regulatory principle, BEL strongly believes Code changes should not apply retrospective obligations on any industry participants. In this case, new testing obligations should not apply to existing generation assets.
2. BEL notes the draft CACTIS mandates that asset owners, including Buller, provide real-time indications of controllable load and the investment needed for provide real-time SCADA indications must be in place, tested and operational by 1 July 2026. It is not clear from the consultation paper whether provision of this real-time SCADA data replaces the Code obligation for distributors to do difference bids. BEL submits that because of the tight timeframe for these new requirements distributors should be able to continue to provide difference bids until the equipment is operational to do real-time SCADA indications.

The consultation paper includes an unsubstantiated estimate of \$2.3 million<sup>1</sup> for the cost distributors face of implementing this real-time SCADA indications obligation. BEL is yet to investigate our cost or the cost benefit for our customers given the size and location of our network.

3. The draft CACTIS will result in the System Operator collecting detailed information from assets owners to improve its coordination of real-time dispatch. The Authority has parked to Stage 2 consideration of how the information the System Operator collects will be shared with distribution companies and Transpower Grid Owner. BEL submits it would be more efficient if the Authority resolved the information sharing challenge before placing additional/more stringent obligations on asset owners for two reasons:
  - a. any arrangements asset owners have to make with the OEMs to enable model sharing with the System Operator will not have to be revisited to enable the System Operator to pass on the data to other (that is, a Code requirement on the System Operator to share information with distributors and Transpower Grid Owner may not be accepted by OEMs); and
  - b. the degree to which information can be shared is likely to influence the success of any future DSO model (that is, if it impossible to resolve the information sharing challenge this more or less pre-determines the Total TSO model (and that the Total DSO model can't be effective).

We would welcome the opportunity to discuss our submission with you.

Yours sincerely,

Danial Roos  
Group Commercial Manager

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<sup>1</sup> “Implementing these controllable load indications nationwide is estimated to cost approximately \$2.3 million—primarily due to the need for some distributors to establish Inter-Control Centre Communication Protocol (ICCP) links or upgrade their existing ICCP links. The system operator’s implementation costs are expected to be minimal, with negligible ongoing cost implications.” Paragraph 6.15 of consultation paper