



12 August 2025

Submissions
Electricity Authority
Level 7, Harbour Tower
2 Hunter Street
Wellington

By email: fsr@ea.govt.nz

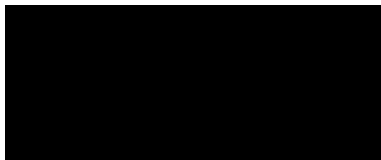
Subject: Consultation Paper- Promoting reliable electricity supply – a Code amendment proposal on common quality-related information

Contact welcomes the opportunity to provide comment on the Authority's consultation paper above.

Contact agrees that it may be more practical and/or efficient to move some technical requirements out of the code to a separately referenced document (CACTIS), but we have concerns on the robustness of the consultation process. We also have concerns around the modelling and information requirements in the CACTIS. We understand that there will be further consultation on this document in the coming months.

Further details on these concerns and additional feedback to the specific consultation questions are given in Appendix A. Should you have any questions on the above, please let me know.

Yours sincerely



Gerard Demler

Transmission Manager, Contact Energy

Appendix A

Submitter	Contact
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Questions	Comments
Q1. Do you support the Authority's proposal to clarify the Code's common quality information requirements and describe the technical specifications in a document incorporated by reference in the Code?	Somewhat support. This may be a more efficient approach for the System Operator (SO) to manage their principal performance objectives (PPOs), but we have concerns that removing the Authorities' oversight into the consultation process may mean that submissions on changes to the CACTIS are not adequately addressed or responded to.
Q2. Do you have any comments on the drafting of the proposed amendment?	Additionally include that the Authority maintains oversight into the consultation process for all documents incorporated in the code.
Q3. Do you see any unintended consequences in making such an amendment?	Incorporating external documents into the code does allow the SO to make changes at will and there is a risk that submissions on those changes are not adequately addressed and responded to, or the changes proposed are not practical and/or come with material cost implications.
Q4. Do you agree with the objective of the proposed amendment? If not, why not?	Somewhat agree. We agree that the introduction of IBR generation onto the power system requires more granular information for the SO to maintain its (PPOs), but we are unsure why this approach is applied to all generation types retrospectively regardless of their technology?
Q5. Do you agree the benefits of the proposed amendment outweigh its costs? Please provide evidence to support your view. This may include incremental benefits and costs associated with the draft CACTIS.	Disagree. With respect to the High-Speed Data requirements (monitoring) we are unsure if such equipment is available for station measurements as this is a derived value of the station's individual units and estimating costs for this provision would be difficult. We are interested

	to know where the costs in the consultation were derived from. Station HV transformer measurements are assumed to mean the HV side of the generator transformers, some of our stations do not have HV VTs, and the installation of these VTs would be well in excess of the costs in the consultation (estimated \$80-100k per unit). It is also noted that HV CTs are designed as a protection device so you cannot expect metering class accuracy.
Q6. Do you agree the proposed amendment is preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010.	Somewhat agree. The preferred option seems to be the most efficient but as mentioned in our responses above, the process of consulting and considering submissions needs to be robust to ensure asset owners' (AO) concerns are accounted for. The expectations of the preferred option must be reasonable and practical regarding the requested technical requirements. From our experience with the current guideline approach we haven't heard of any circumstances where these guidelines have not been followed as it is in the best interests of AO's to comply to meet project scheduling.
Q7. Do you agree the Authority's proposed amendment complies with section 32(1) of the Act?	Somewhat agree. Additional costs imposed on generation can be passed through to consumers through higher energy offers to recover those costs.
Q8. Do you have any comments on the drafting of the proposed amendment?	As above, add that the Authority maintains oversight into the consultation process.
Q9. Do you have any comments on the draft Connected Asset Commissioning, Testing and Information Standard?	Please see our responses to questions 4 and 5 above. Regarding sharing of encrypted models from other asset owners (clauses 5.22 and 5.23) we see potential OEM IP issues with this proposal. It is likely that most AO voltage fault ride through studies will require other AO models, so rather than treating these consents or requests individually it would be preferable and more efficient if the SO maintains a power system case that has these encrypted models

	included, this would be updated as new generation assets are commissioned onto the system.
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