



11 August 2025

Electricity Authority  
PO Box 10041  
Wellington 6143

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

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

The WEL Networks appreciates the opportunity to provide feedback on the common quality information amendment.

WEL Networks (WEL) is New Zealand's sixth largest electricity distribution company and is 100% owned by our community through our sole shareholder WEL Energy Trust. Our guiding statement of strategic intent is to be leading Waikato's energy future, and we work to ensure that our customers have access to reliable, affordable, and environmentally sustainable energy.

WEL supports the amendments proposed and the creation of a technical requirements document to be incorporated by reference in the Code, but with clarification of some terminology suggested.

In particular reasonability in the system operators information requests should be more fully defined. For example the system operator requires validated models for a variety of software packages, and the costs of providing validated models for these packages are significant. It should be demonstrated by the system operator that the packages are necessary, that use of the packages is best practice, or that the packages will be adequate for the future. Without this demonstration of benefits, i.e. the reasonableness of the requests, there is a danger of introducing unnecessary costs into the system for little return.

We also note that a number of amendments are purported to be benefit positive, but without strong quantification of the costs involved.

Our responses to the specific questions sought by the Authority are attached and should you require clarification on any part of this submission, please do not hesitate to contact me.

Yours sincerely

A black rectangular box redacting the signature of Andrew Maseyk.

Andrew Maseyk  
Regulatory Specialist

Two black rectangular boxes redacting contact information, likely a phone number and an email address.



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?	Yes.
Q2. Do you have any comments on the drafting of the proposed amendment?	Is this question a duplication of Q8? It is not obvious what drafting of the proposed amendment is referred to as there is no drafting of the proposed amendment information in the prior sections.
Q3. Do you see any unintended consequences in making such an amendment?	No.
Q4. Do you agree with the objective of the proposed amendment? If not, why not?	<p>The objective is somewhat imprecise.</p> <p>6.1. (a) improving the accuracy (...) of asset owners' obligations to provide common quality-related information to the system operator.</p> <p>It is not apparent what the "accuracy" of asset owner's obligations to provide common quality information refers to or how the proposal improves this accuracy of obligations.</p>
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.	<p>There is insufficient quantification of the benefits to be able to conclude that the benefits outweigh the costs.</p> <p>The realisation of avoided costs in 6.16 needs to be reflected in a reduction in the SOSPA fee otherwise the costs have not been avoided.</p>
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	The option: "Form an industry working group to define clear expectations between asset owners and the system operator on the standard of "reasonableness" for information requirements" is incomplete as the





<p>statutory objectives in section 15 of the Electricity Industry Act 2010.</p>	<p>definition of “reasonableness” can then be incorporated into the Code.</p> <p>This option would be superior as it addresses the underlying cause (the system operator’s inability to describe the reasonableness of the system operator’s information requirements) and can be implemented with much less effort (i.e. the incorporation of a document by reference and the ongoing maintenance of such a document.)</p>
<p>Q7. Do you agree the Authority’s proposed amendment complies with section 32(1) of the Act?</p>	
<p>Q8. Do you have any comments on the drafting of the proposed amendment?</p>	<p><i>Definition of maximum capacity</i></p> <p>Maximum capacity should be a defined term for the avoidance of doubt. For example, whether maximum capacity relates to short term overload capacity, steady state rating or the peak power that can be injected into the network through the point of connection.</p>
<p>Q9. Do you have any comments on the draft Connected Asset Commissioning, Testing and Information Standard?</p>	<p><i>Scaling Factors</i></p> <p>8.23 If net (or gross) measurements are required in any of Tables A-J below, the use of scaling factors together with the provision of the relevant gross (or net) values is acceptable with the system operator’s approval (such approval not to be unreasonably withheld). Each generator and connected asset owner must provide scaling factors to the grid owner so that the grid owner can apply the adjustment at the SCADA server.</p> <p>The defined term “scaling factor” is removed from Part 1 but is not defined in the CACTIS.</p> <p><i>In writing</i></p> <p>We suggest references to “in writing” be updated to reflect the capabilities of modern technology, e.g.</p> <p>“8.10 An asset owner must transmit information between its control room and the system operator in writing.”</p>

